

Response to Woodland Trust:**Glen Earrach Pumped Storage Hydro Scheme - Addressing Objection Response**

To: C Johannesen, Programme Officer

CC: Energy Consents Unit, The Highland Council.

From: Glen Earrach Energy Team

Date: 12th November 2025

Re: Response to Glen Earrach (ECU00005121)

Dear C Johannesen,

Glen Earrach Energy Ltd thanks the Woodland Trust for their detailed submission and acknowledges the importance of protecting Scotland's ancient and native woodlands.

The project team shares this commitment and has taken extensive steps to avoid, minimise and offset any potential effects where possible.

The overall **scale of woodland impact is very limited**. Less than ten hectares of land associated with the Ancient Woodland Inventory will be directly affected, the majority of which is commercial plantation rather than native ancient woodland. The area of native AWI affected is **around one hectare**.

The scheme has been **carefully sited and designed to minimise woodland loss**, as illustrated in *Figure 18.1* (Lower Control Works) and described in the *Evolution of Design and Alternatives* chapter of the EIAR. Infrastructure locations were iteratively refined to avoid higher-value habitats wherever practicable.

All **tunnelling works are located at considerable depth**, generally hundreds of metres below ground level. The **closest tunnelling to the surface in an area of woodland occurs at the Lower Control Works**, where the tunnel crown remains **over 25 m below ground** (*Figure 2.17*). No effects on root systems or woodland soils are predicted.

The project will be implemented in accordance with the **Outline Construction Environmental Management Plan (oCEMP, Appendix 3.1, § 4.9.3)**, which sets out protective measures for woodland, veteran trees and adjacent habitats. These include buffer zones, fencing, pollution prevention and environmental clerk-of-works supervision.

The scheme is being brought forward by the **local landowner**, ensuring an **inherent custodial approach** to land management and long-term stewardship of compensatory and restoration areas.

In line with national policy, **substantial compensatory measures** are proposed, including large-scale native woodland creation and peatland restoration that far exceed the minimum ratios set out in the Control of Woodland Removal Policy. Specifically the project will deliver:

- **Enhancement of 55 hectares of ancient semi-natural birchwood**, through protection from deer to encourage regeneration and recruitment which are currently lacking;
- **Provision of a deer-protected buffer for ancient semi-natural woodland** regeneration;
- **Planting of 700 hectares of native woodland** and montane scrub, including:
 - extensive **Upland Birchwood supplemented by native Scots pine woodland (approximately 547 hectares)**;
 - **riparian woodland along watercourses (approximately 24 hectares)**;
 - **montane dwarf birch planting** and regeneration zones, supplemented with juniper and Scots pine (**approximately 76 hectares**);
 - **montane willow scrub planting** and regeneration zone (**approximately 27 hectares**);
- Reduction in deer density on retained open moorland (across approximately 59 km²) from 9.5 per km² at last count to 8.5 per km²;
- Provision of three ponds suitable for emerald dragonflies, a local speciality; and
- Provision of suitable habitat for water voles to be translocated to from the Headpond.

They will be secured through legally enforceable planning conditions and long-term management plans.

While the development necessarily entails some limited woodland impact, this has been **reduced to the minimum practicable extent** and must be viewed in the context of a **nationally significant infrastructure project** delivering large-scale, low-carbon energy storage in support of Scotland's and the UK's net-zero objectives. The project therefore provides **significant and clearly defined public benefits** that outweigh the minor and fully mitigated woodland losses, in full accordance with **National Planning Framework 4 Policy 6**.

Yours sincerely,

R. Martin Lacey

Project Director
Glen Earrach Energy Limited