

AI_4_02 Landscape and Visual Matters

Electricity Act 1989

Town and Country Planning (Scotland) Act 1997

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Glen Earrach Energy Pumped Storage Hydro (PSH) Project

Response to THC Landscape Officer Consultation Response dated 21 May 2026

ECU Ref: ECU00005121

THC Ref: 25/01599/S36

The Applicant has reviewed the Landscape Officer consultation response and sets out below its response and clarification on the points raised.

At the outset, the Applicant notes that the Landscape Officer confirms the LVIA in Chapter 6 of the EIA Report is thorough and broadly accords with GLVIA3, and that many of its findings are agreed. It is also noted that the Landscape Officer is generally content with the effects associated with the Lower Control Works, secondary bund and other operational elements, and confirms that the Proposed Development would **not compromise the overall integrity** of the Loch Ness and Duntelchaig SLA.

The objection is a focused one. It relates principally to Meall Fuar-mhonaidh and the "Dramatic Great Glen" Special Quality, specifically the Landscape Officer's view that the headpond components would disrupt the relationship between the hill and its setting and should be assessed as Major adverse rather than Moderate adverse during operation. The Applicant understands that the remaining matters (photography, water-based receptors, the A82 layby, and the structure of the SLA assessment) are raised as observations or requests for clarification rather than the stated basis of the objection. The Applicant's response to each is below.

1. Timing and status of this response

The Landscape Officer response is dated 21 May 2026, and came to the Applicant team's attention by email on 25 June 2026. This was after Additional Information Round 3 had been progressed and after the updated material had been provided to THC to assist with preparation for the August committee. The original EIAR was dated March 2025, with the updated viewpoints being provided in early July 2025.

Given the stage now reached, the Applicant has prepared the response set out below so that the Council's report can reflect the Applicant's position accurately. This response has been prepared with input from AECOM's chartered landscape architects, who authored the LVIA.

2. Photography and visualisations

The Applicant does not accept that the photography concern was left unresolved, or that it was simply an "easy fix" that was not addressed.

- The thirteen LVIA viewpoints were agreed in advance with THC's then Landscape Officer at scoping on 19 September 2024 and again at a meeting on 4 November 2024, as recorded in the LVIA.
- Following submission of the EIAR, THC issued a Viewpoint Photography Quality Appraisal in May 2025. The Applicant sought technical advice from its consultant (AECOM) LVIA team, whose position was that, although the photography had been captured in difficult winter conditions, the images did not obscure the horizon or adversely affect the view of the development (the relevant test in THC's own visualisation guidance). AECOM recognised the particular difficulty at VP12 and accepted that further photography could be undertaken where useful.
- A dedicated landscape and visualisation meeting was then held with THC on 4 June 2025, attended by THC Planning Officers, THC's then Landscape Officer, ReAmp (GEE's planning consultant) and AECOM's LVIA team. The agreed approach included re-photography of selected viewpoints, review of VP1 and additional labelling of VP13. Following that meeting, THC undertook further on-site appraisal of the viewpoints and advised that additional work was required, identifying an additional or alternative viewpoint near Foyers Lodge for VP2 and a clearer viewpoint along Bunloit Road for VP4. These were subsequently incorporated as VP2a and VP4a.
- The Applicant undertook the re-photography and provided raw bearing images to THC before finalising the visualisations. On 25 June 2025, THC planning officer at the time provided feedback by email that the raw photographs were "indeed much better", and nominated preferred frames. The updated photography and dual NatureScot/THC visualisations, including the two additional THC-requested viewpoints, were issued with the Additional Information in July 2025. NatureScot did not raise any concern regarding the photography or visualisations in its consultation response and raised no landscape-based objection to the Proposed Development.
- The Applicant acknowledges, as recorded at paragraph 1.1.1.3 of the AI Report, that the winter and summer photography at VP1 do not exactly align. Both photographs are from the Meall Fuar-mhonaigh summit area, but were taken from slightly different positions within that summit area. The visualisation was annotated accordingly to make this clear to the decision-maker. The Applicant does not consider that this minor positional difference undermines the LVIA conclusions. The photography and visualisations are one component of an assessment that also draws on fieldwork, ZTV analysis, wirelines, professional judgement and a detailed understanding of the scheme design. The photomontages and wirelines provide sufficient information to understand the nature, location and scale of the likely effects.

The Applicant's position is that the photography matters were addressed through an agreed process with THC in 2025, that the resulting material is fit for purpose, and that no further photography is proposed.

3. Assessment of the SLA and its Special Qualities

The Landscape Officer observes that the LVIA assesses the SLA as a whole rather than presenting a discrete assessment of each Special Quality.

The Applicant accepts that the formal assessment is presented at the level of the SLA as a locally designated landscape receptor, and that it is not structured as a Special-Quality-by-Special-Quality table. The relevant Special Qualities (including "The Dramatic Great Glen", and specifically the Meall Fuar-mhonaidh vantage point, the landform trench, the long vistas, Urquhart Castle and the contrasting intimate plateau) are nevertheless identified and considered within the assessment (EIAR paragraphs 6.5.22–6.5.26; Appendix 6.2 Table 2-1). The Applicant recognises that the Landscape Officer would have preferred the judgement to be structured more explicitly by individual Special Quality.

The relevant Special Qualities are identified and considered within the existing LVIA, as set out above. The Applicant considers that the assessment provides sufficient information to understand the likely effects of the Proposed Development on the SLA. Importantly, the Applicant's position that the Proposed Development would not compromise the overall integrity of the SLA is consistent with the Landscape Officer's own conclusion on integrity.

4. Meall Fuar-mhonaidh and the "Dramatic Great Glen" Special Quality

The Applicant acknowledges that Meall Fuar-mhonaidh is an important local landmark and a valued recreational viewpoint, and that the headpond embankments and associated works would be visible from the summit area, specifically in views to the north-west.

The LVIA already identifies significant operational visual effects at VP1 (Moderate adverse and significant at both year 1 and year 15). The Applicant therefore does not dispute that there is a noticeable and significant effect from this receptor, nor that it engages the north-western outlook described in the cited Special Quality.

The point of difference is one of professional judgement on magnitude. AECOM's chartered landscape architects reached a Medium operational magnitude on a reasoned basis: the wider composition that defines the view (the large-scale plateau with the backcloth of the Monadhliath massif and the Affric and Balmacraan mountain interior) is unchanged; the iconic views south-east towards Loch Ness are unaffected (as the Landscape Officer accepts); the large scale of the receiving landscape moderates the perceived scale of change; and embedded mitigation softens the operational view over time. The Applicant maintains that Moderate adverse is a reasonable professional judgement, while recognising that the Landscape Officer has placed greater weight on the relationship between the hill and its setting and reached a different view.

The Applicant's position is that, whether the operational effect at this receptor is characterised as Moderate or Major, it remains a significant effect in EIA terms and is a contained effect on the north-western aspect of a single summit. It does not affect the overall integrity of the SLA (as the Landscape Officer accepts) and falls to be weighed in the wider planning balance, including the nationally significant renewable energy and storage benefits of the Proposed Development as a national development. In this respect, NPF4 recognises that significant landscape and visual effects are to be expected for some forms of renewable energy development and, in relation to locally designated landscapes such as the SLA, that such effects may be acceptable where they are clearly outweighed by benefits of at least local importance (Policies 11 and 4). The Applicant does not consider that the distinction between a Moderate and a Major characterisation at this receptor alters that planning balance.

5. Construction effects from Meall Fuar-mhonaidh

The LVIA already identifies significant construction effects from this receptor (Major adverse and significant at VP1, the highest level on the scale). The disagreement appears to concern the degree of significance rather than whether significant construction effects occur.

The Applicant's position is that the LVIA appropriately distinguishes temporary construction effects from longer-term operational effects. The LVIA classifies the more intensive Headpond construction period as short-term, and construction effects would reduce substantially following removal of temporary activity, plant, movement and construction lighting, and following reinstatement and the establishment of mitigation.

6. Ridge form and views from VP7 and VP9

The Landscape Officer raises a concern that the headpond components would alter the perceived ridge form near Meall Fuar-mhonaidh, from an undulating ridge to a more uniform engineered edge.

The Applicant notes that the Landscape Officer agrees the operational effect from VP7 (Dores Beach) would not be significant, which is consistent with the LVIA. In relation to VP9, the Applicant recognises that the Landscape Officer considers the effect would be Moderate adverse and significant. The Applicant's assessment took into account the distance, the context of the visible development, and the transient nature of the receptor experience from water-based movement. The Applicant maintains that its assessment is reasonable, and notes that the Landscape Officer's own description of VP9 as a transient view experienced "in passing" is relevant to the duration and nature of the effect on those receptors.

7. Water-based recreational receptors and the Great Glen Canoe Trail

The Landscape Officer states that the LVIA does not assess the duration of significant effects for recreational water-based receptors, and refers to the "Loch Ness Canoe Trail". The Applicant understands this to be a reference to the Great Glen Canoe Trail.

The Applicant does not accept that water-based recreational receptors have been omitted. The Great Glen Canoe Trail is identified in the LVIA baseline (EIAR paragraph 6.5.10), and recreational watercraft (including users of the Great Glen Canoe Trail and pleasure craft) are represented in the visual assessment by Viewpoint 9 (Loch Ness, canoeists and pleasure craft) (EIAR paragraph 6.5.59; Appendix 6.3 Table 2-9). Viewpoint 9 is located on the loch and has theoretical visibility of both the Headpond and the Lower Control Works. The assessed effects on these receptors are Moderate adverse and significant during construction, reducing to Minor adverse at operation. The duration of the significant construction-phase effect is medium-term overall, with peak activity at the Headpond and Lower Control Works being short-term, consistent with the construction programme.

The Applicant accepts that the assessment is not presented as a separate route-by-route analysis of the Great Glen Canoe Trail. Unlike the defined walking and cycling routes on the ground, for which a sequential visual assessment was undertaken, water-based recreation on Loch Ness is not confined to a single route, as the Landscape Officer acknowledges, and a fixed route-by-route analysis is therefore of limited application to these receptors. The Applicant's position is that Viewpoint 9 provides a suitable representative location for water-based receptors, recognising that these are moving receptors whose duration, angle and composition of view vary substantially with location, direction of travel, distance from shore, weather and route. The Applicant considers the LVIA provides sufficient information to understand the likely visual effects experienced by these receptors.

8. A82 layby and public access opportunity

The Landscape Officer comments that the conversion of the existing A82 layby to a private access junction represents a missed opportunity to retain or create a stopping place and to provide interpretation. This is presented as an enhancement opportunity rather than a reason for objection.

The Applicant welcomes the suggestion. The Applicant has been open throughout to exploring how some form of amenity benefit could be provided in association with the Lower Control Works / A82 layby location, including interpretation or a viewing opportunity where this can be achieved safely and appropriately.

The Applicant's understanding from earlier discussions, including with THC, is that there are practical constraints around dual use of this location as both an operational site access and a public stopping point. These include the need to maintain clear and safe access to the Lower Control Works, avoid conflict between operational traffic and visitor movements, and avoid creating an unmanaged area that could encourage unsafe stopping, informal overnight parking or other unauthorised use adjacent to the trunk road.

Notwithstanding those constraints, the Applicant remains willing to discuss with THC, Transport Scotland, its operating company and any other relevant stakeholders whether an appropriately designed replacement layby, stopping/viewing opportunity or interpretation provision could be secured through condition or at detailed design stage. Any such provision would necessarily be subject to road safety, trunk road requirements, land control, and operational, environmental and technical constraints. The Applicant would not wish to commit to a specific design solution at this stage without further technical review, but is content to explore the point constructively.

9. Overall position

In summary:

- the LVIA is agreed by the Landscape Officer to be thorough and broadly compliant with GLVIA3, and the majority of its findings are not disputed;
- the Landscape Officer is generally content with the Lower Control Works, secondary bund and other operational elements;
- the objection is a focused one, concerning principally the headpond components as experienced from Meall Fuar-mhonaidh and the relationship of that hill to its setting;
- the LVIA already identifies significant operational visual effects at VP1, and significant construction effects;
- the residual difference is one of professional judgement on magnitude and the resulting effect (Moderate versus Major adverse) at a single viewpoint;
- the Landscape Officer accepts that the overall integrity of the SLA would not be compromised;
- the photography concerns were addressed through an agreed process with THC in 2025, including re-photography and the two additional THC-requested viewpoints with THC confirming the new photography was much better;
- water-based recreational receptors, including the Great Glen Canoe Trail, are assessed via Viewpoint 9, not through a separate route-by-route analysis (for the reasons set out in the relevant section above); and
- the A82 layby point is appropriate for further discussion as a condition or detailed design matter.