AI_4_04 Ecology

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 Ecology Consultation Response dated 14 July 2026

ECU Ref: ECU00005121
THC Ref: 25/01599/S36

Biodiversity Compensation and Enhancement

1. Applicant's response

The Highland Council Ecology Officer's consultation response of 14 July 2026 raises concerns regarding the treatment of native tree planting on Upland Heathland, predominantly wet heath, as enhancement rather than woodland creation within the SSER Biodiversity Net Gain Toolkit. In particular, the Ecology Officer considers that the heathland may potentially fail future assessment under Common Standards Monitoring and that the submitted assessment may consequently claim more biodiversity units than can be delivered.

The Applicant has reviewed the intended ecological outcome and its representation in the metric. The relevant biodiversity measure has been refined, with additional controls on its implementation, and the calculation has been revised as a result. Further information on the revised approach is provided below.

Across 539.63 ha of Upland Heathland:

- the target habitat outcome is retained Upland Heathland with scattered native trees and scrub, not woodland;
- combined mature native tree and scrub cover will remain below 20%;
- no continuous canopy will be established;
- near-natural wet heath and other unsuitable areas will be excluded from planting;
- the formal Condition of the retained wet heath will remain unchanged from baseline, with no improvement in Condition claimed;[1] and
- the post-intervention habitat will be recorded in the revised metric as Upland Heathland.

Following this review, the Applicant has adopted a more conservative treatment of the intervention within the metric, reflecting the revised habitat outcome. The revised calculation therefore produces a lower BNG result than that submitted. The whole-scheme area-based BNG result reduces from 22% to 19%, but this remains well above the minimum 10% biodiversity enhancement required by paragraph 4.40 of The Highland Council's Biodiversity Enhancement Planning Guidance.

[1] The large majority of the treatment area is recorded at Fairly Good baseline Condition. Two small polygons totalling 4.03 ha are recorded at Moderate baseline Condition and are conservatively retained at Moderate in the revised calculation. Management through the final LEMP will seek to improve those polygons to Fairly Good Condition, but no biodiversity units arising from that potential Condition improvement are claimed.

The accompanying AI_4_05, Upland Heathland Biodiversity Net Gain Review (the technical note), provides the ecological and methodological basis for the revised treatment. Appendix 1 to the accompanying technical note provides an example of the revised calculation, a summary of the affected polygon results and reconciliation to the whole-scheme result.

2. Scope and effect on the submitted proposals

The revised retained-Upland-Heathland treatment applies to:

- 522.50 ha of Upland Heathland within areas previously assessed as proposed non-riparian Upland birchwood; and
- 17.13 ha of Upland Heathland within areas previously assessed as proposed Other Scots pine woodland.

This gives a total revised area of 539.63 ha.

The separate 24.17 ha riparian planting measure and the 7.26 ha of bracken and acid grassland within the wider non-riparian planting zones are outside the 539.63 ha retained-Upland-Heathland treatment. Their physical and metric treatment remains unchanged from that presented in EIA Report Appendix 7.5, as confirmed in the accompanying technical note. All other biodiversity measures remain unaffected.

The previously submitted documents described the 539.63 ha as developing into Upland birchwood or Other Scots pine woodland, with the existing heath forming the woodland ground flora. Having considered the Ecology Officer's comments, the Applicant has revised that target habitat outcome. This is a refinement of the proposed biodiversity measure.

The geographical planting areas remain substantially unchanged. However, the intended mature tree and scrub cover, target habitat and resulting metric treatment are now defined. The detailed planting density and spatial distribution will be established through the final LEMP within those controls, ensuring that Upland Heathland remains the primary habitat. The submitted baseline habitat assessment remains unchanged.

For the 539.63 ha, this response and the accompanying technical note supersede the relevant target-habitat descriptions and scoring in EIA Report Appendix 7.5 and the corresponding descriptions in the Outline Landscape and Ecology Management Plan (oLEMP) (EIA Report Appendix 6.4).

Insofar as they relate to the 539.63 ha, references in the oLEMP to native woodland planting, establishment of Upland birchwood or Scots pine woodland, retention of the existing heath as woodland ground flora and expansion of the native woodland network are revised to describe scattered native tree and scrub planting within retained Upland Heathland. The affected provisions are principally paragraphs 3.2.22, 3.2.27, 3.2.45, 3.2.48, 3.2.49 and 3.2.51, together with Figures 6.4.1 and 6.4.2 insofar as they identify the target habitat within those areas.

The existing habitat exclusions and pre-planting inspection requirements at paragraphs 3.2.23, 3.2.24, 3.2.26 and 3.2.44 continue to apply and are supplemented by the exclusion of near-natural wet heath. The riparian planting provisions at paragraphs 3.2.25 and 3.2.50 are unaffected. The monitoring requirement at paragraph 3.2.46 will be extended through the final LEMP to cover mature native tree and scrub cover and the condition of the retained wet heath.

The accompanying technical note explains why scattered native trees and scrub below the relevant Common Standards Monitoring criterion are consistent with the habitat remaining wet heath in at least 'Fairly Good' Condition, and how that outcome will be secured.

3. Revised metric treatment and BNG result

The baseline, submitted post-intervention and revised post-intervention values for the 539.63 ha are:

SSER measure	Baseline	Submitted post-intervention	Revised post-intervention
Primary habitat	Upland Heathland	Upland birchwood / Other Scots pine woodland	Upland Heathland
Condition	Fairly Good[2]	Fairly Good	Fairly Good
Distinctiveness	Medium	High	High
Connectivity	Low	Moderate	Moderate
Strategic Significance	Low	High	Medium

The accompanying technical note sets out the basis for each revised value and explains why the defined habitat outcome is appropriately represented as enhancement of retained Upland Heathland. The treatment does not depend upon the habitat becoming woodland or upon an improvement in formal wet-heath Condition.

The revised results are:

Measure	Submitted assessment	Revised assessment
Areas previously assessed as Upland birchwood	36.8%	33.4%
Areas previously assessed as Other Scots pine woodland	30.8%	27.9%
Whole-scheme area-based BNG	22%	19%

The revised result is lower than that submitted and reflects the revised habitat outcome and revised calculation. Appendix 1 to the accompanying technical note provides a worked example of the revised calculation, a summary of the affected polygon results and reconciliation of the intervention-level results to the 19% whole-scheme result.

4. Delivery and conclusion

The revised habitat outcome and detailed planting design will be secured through an appropriately worded condition requiring submission and approval of the final Landscape and Ecology Management

[2] See note 1 above. Two small polygons totalling 4.03 ha are recorded at Moderate baseline Condition and are conservatively retained at Moderate in the revised calculation.

Plan by The Highland Council, in consultation with its Ecology Officer and NatureScot where appropriate.

For the retained-Upland-Heathland areas, the final LEMP will:

- identify the areas subject to the retained-heath treatment and those excluded from planting;
- specify the native species, planting pattern and initial stocking densities;
- secure combined mature native tree and scrub cover below 20% and prevent establishment of a continuous canopy;
- require the wet heath to be retained or restored to at least 'Fairly Good' Condition; and
- provide for monitoring and corrective management where there is a risk of habitat deterioration or material change.

The Applicant's proposals have consistently sought to expand native woodland cover in a relatively treeless upland landscape, and that remains a legitimate ecological objective. Where, through the final LEMP process, The Highland Council, following consultation with its Ecology Officer and, where appropriate, NatureScot, identifies specific locations in which establishment of native woodland would deliver a preferable ecological outcome, the Applicant would be content for those areas to be designed and delivered as woodland. Any such change would need to be spatially defined and ecologically justified in the final LEMP, with its treatment in the biodiversity assessment updated accordingly.

The Applicant has therefore revised and more precisely defined the proposed habitat outcome and its treatment within the BNG assessment directly in response to the Ecology Officer's concern. The resulting whole-scheme BNG figure of 19% is lower than that submitted (22%) but remains above the minimum 10% biodiversity enhancement required by The Highland Council's Biodiversity Enhancement Planning Guidance, with delivery secured through the final LEMP and associated monitoring and management.

On that basis, the Applicant considers that the concern regarding Biodiversity Compensation and Enhancement has been addressed and requests that this matter be treated as resolved, subject to an appropriate condition.

Peatland Restoration

The approximately 1,140 ha referred to by the Ecology Officer is the restoration opportunity identified at application stage, not a cap on the Applicant's commitment. The submitted oLEMP and Outline Peatland Restoration Plan establish a ratio-based commitment rather than a fixed maximum area. The Applicant confirms its commitment to compensate for blanket bog loss at the NatureScot 1:10 lost:restored ratio, together with a separate enhancement component, the extent of which would be agreed with The Highland Council and NatureScot through the final Peatland Restoration Plan.

The final Peatland Restoration Plan will confirm the restoration extent and locations necessary to deliver that commitment. The package already identified is substantial, including approximately 328 ha of forest-to-bog restoration alongside extensive open-ground restoration at landscape scale. The final package will take account of the location, quality, scale, hydrological coherence and likely success of the restoration proposed.

NatureScot's current guidance describes 1:10 as a recommendation and recognises that site-specific circumstances may justify variation. Recent Highland practice also demonstrates this flexibility. For Earba PSH, The Highland Council recommended no objection to a restoration package below 1:10, and Scottish Ministers subsequently imposed Condition 34 requiring improvement to good quality of at least 600 ha of peatland against approximately 74 ha affected, equivalent to a conditioned minimum of around 1:8. Notwithstanding that flexibility, the Applicant is confirming its 1:10 commitment, together with enhancement, to provide certainty and resolve the Ecology Officer's concern.

This peatland commitment forms part of a substantially wider biodiversity programme. The oLEMP provides for extensive native tree and scrub establishment, regeneration buffers, montane scrub, deer management and species-specific habitat measures across the estate. Beyond the measures associated with the consent, the Applicant has also made a public commitment through the Additional Information to fund a £15 million, ten-year Ness Catchment Regeneration and Biodiversity Monitoring Programme. Taken together, these measures demonstrate the considerable scale of the Applicant's commitment to biodiversity improvement.

The Applicant proposes that the residual peatland loss, final restoration extent and locations, together with the necessary delivery, monitoring, management and remedial arrangements, are secured through a condition requiring approval of the final Peatland Restoration Plan by The Highland Council, in consultation with NatureScot, before the relevant works commence. The condition will provide a clear and enforceable mechanism for delivering the 1:10 commitment and associated enhancement, including confirmation of suitable restoration land and delivery arrangements. On that basis, the Applicant considers the Ecology Officer's peatland restoration concern has been addressed and requests that this matter be treated as resolved, subject to an appropriate condition.

Grid Connection

The Ecology Officer's observation that there is presently insufficient information to assess the grid connection fully is noted. As explained in the Applicant's separate AI_4_06, Grid Connection: Further Clarification, submitted concurrently with this response, no fixed route, design or connection solution currently exists. The information provided therefore assesses the likely significant environmental effects associated with a reasonable indicative route using the best information presently available.