

# **Appendix 6.4: Sloy Pumped Hydro Storage Scheme: Gate Check Report**



# **Sloy Pumped Storage Scheme Gate Check Report**

**May 2024**

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# 1. Introduction

## 1.1. Introduction

This Gate Check Report has been prepared by ASH design + assessment Limited (ASH) on behalf of SSE Generation Limited (“the Applicant”). This report is submitted to the Energy Consents Unit (ECU) of the Scottish Government in advance of an application to the Scottish Ministers under Section 36 of The Electricity Act 1989 for consent to convert the current Sloy Hydroelectric Power Station (‘the existing power station’) into a pumped storage scheme.

The proposals for which consent under Section 36 of the Electricity Act 1989 will be sought by the Applicant are referred to in this report as ‘the Proposed Development’. The application for Section 36 consent is being prepared by SSE Renewables (“the Developer”), on behalf of the Applicant.

The Scottish Ministers previously granted consent for a pumping station at Sloy in September 2010, (referred to hereafter as the Consented Pumped Storage Scheme), with subsequent extensions granted in 2013 and 2014, until December 2018, however, due to a perceived lack of market at the time, the scheme was never built. In recent years there has been an increase in the development of flexible renewable schemes (principally wind farms) to assist the UK in attaining its commitment to increase the proportion of electricity generated using renewable resources. As a result, there is now a recognised, clear, and urgent need for the development of pumped storage, to enable greater compliance with electricity supply matching the demand.

The Proposed Development would be located within the grounds of the existing Sloy Hydroelectric Power Station, opposite the Inveruglas Visitor Centre, adjacent to the A82, and within the Loch Lomond and Trossachs National Park (LLTNP). The Proposed Development would consist of an extension to the existing tailrace, new intake structure, two new underground pumps, and a new above ground building. site establishment area and an area of landscape reinstatement to the north. The overflow car park at the Inveruglas Visitor Centre would also be used during the construction phase of development. The purpose of the scheme will be to enable water to be pumped through existing pipelines and tunnels from Loch Lomond to Loch Sloy during times of low electricity demand, to store excess energy ready for use during periods of higher demand or lower supply. The location of the Proposed Development is shown on **Figure 1** and the site layout is shown on **Figure 2**.

Access during the construction of the Proposed Development would utilise the A82 public road, taking access from the existing northern bellmouth junction at the existing Sloy Hydroelectric Power Station (to be upgraded and extended) and would involve reconfiguration of the internal road. Access during the operation of the Proposed Development would use the existing bellmouth junction to the south of the existing Sloy Hydroelectric Power Station.

## 1.2. Pumped Hydro Storage

Pumped hydro storage uses excess electricity during off-peak hours. During this time, it pumps water from a lower reservoir to an upper reservoir. Water is released during peak demand periods. Water flows from the upper reservoir, downhill. As it moves, it passes through turbines to generate electricity.

One of the key advantages of pumped hydro storage is its large-scale storage capacity. This technology has the potential to store massive amounts of energy. This makes it easier to meet high supply demands than other technologies.

Long duration electricity storage is critical in our journey to achieve net zero. Energy storage is needed to compliment variable renewable energy sources such as wind and solar. When the wind doesn’t blow and

the sun doesn't shine, we will increasingly need to rely on energy storage technologies. Storage technologies like pumped hydro storage will allow us to meet demand.

Energy storage helps to maximise the use of clean energy resources by:

- Storing excess energy during times of low demand;
- Releasing renewable energy when demand increases; and
- Releasing renewable energy into the system when renewable output decreases.

Pumped hydro storage also offers grid stability and flexibility. With its large-scale storage capacity, it can balance intermittent renewable energy sources. It can ensure a constant and reliable power supply. This stability is crucial in supporting the growth of renewable energy. And the transition towards a cleaner and more sustainable energy sector.

The Draft Energy Strategy and Just Transition Plan (Scottish Government, January 2023) recognises the crucial role that pumped storage hydro has, together with other storage technologies, in Scotland's energy system, as well as the National Planning Framework 4 (NPF4) (2023) which also recognises the need for pumped hydro storage and includes it as a development of national importance.

### 1.3. The Existing Hydroelectric Scheme

The existing Sloy Hydroelectric Power Station came into operation in 1950. It makes use of the waters of Loch Sloy, the surface of which now lies at up to 285m above sea level and the steep slope down to the shores of Loch Lomond, lying at less than 10m above sea level but only 4km away. Such a difference in height within a small horizontal distance offered ideal conditions for the development of the scheme. Sloy Dam (55m high and 357m long), raised the surface level of the loch by about 47m and doubled its length. A system of aqueducts and tunnels was built to divert water into Loch Sloy from areas well to the north and south, significantly increasing the catchment.

From Loch Sloy the water is carried over 3km by a tunnel through Ben Vorlich, which towers almost 940m above Loch Lomond. The water then falls down the side of the mountain in 4 penstocks to the power station at Inveruglas Bay. A surge shaft and surge chamber, built into the tunnel system near its outlet, cope with variations in pressure during the operation of the turbines.

Inside the power station, four turbines drive four vertical shaft generating sets. Currently, three of these sets are rated 40MW and the fourth is rated 32.5MW. There is also a 450kW Pelton wheel generator for emergency supplies. Energy is exported to the grid via 132kV overhead lines connected to the nearby Sloy Substation. With an installed capacity of 152.5MW Sloy is the UK's largest conventional hydroelectric scheme.

Sloy Dam, with a spillway crest level at 285m above sea level has an operational range of approximately 25m and when full, holds 36 million cubic metres of water. The operational storage capacity of Loch Sloy is approximately 15GWh.

Sloy Hydroelectric Power Station generates around 130GWh per year of average rainfall, with a rated capacity of 152.5MW this gives a load factor of approximately 10%. This means that for the equivalent of 90% of the time there is inadequate water in Loch Sloy to generate, Sloy is therefore generally run only at times of peak demand.

### 1.4. Purpose of this Document

The purpose of this Gate Check Report is to satisfy the requirements of the gate checking procedures for Applications under Section 36 of The Electricity Act 1989, namely, to outline consultations with statutory

and non-statutory consultees, engagement with the local community and how matters raised during the scoping process have been dealt with in the EIA Report.

## 2. The Proposed Development

### 2.1. Description of the Proposed Development

The Proposed Development would convert the existing Sloy Hydroelectric Power Station at Inveruglas, into a pumped hydro storage scheme by the introduction of pumps, located in the grounds of the existing hydroelectric scheme, immediately north of the power station building on the A82, adjacent to Inveruglas Visitor Centre.

The pumps would enable water to be pumped from Loch Lomond through up to three of the existing four penstocks then via the tunnel to Loch Sloy during times of low demand (typically overnight) or oversupply (when there is too much renewable energy being generated from wind farms, run-of-river hydro schemes, marine devices etc).

The Proposed Development would enable the load factor at the Sloy Hydroelectric Power Station to increase from 10% to (up to) 20% and would help to reduce the likelihood of renewable energy from other sources being constrained off the grid during times of low demand.

It should be noted that no works would be required at Loch Sloy to enable the Proposed Development.

The principal components of the Proposed Development would comprise:

- A new surface building to house electrical switchgear, pump infrastructure and gantry crane(s);
- Two new underground, multi-stage pumps, located within a new below ground pump hall;
- A small new transformer compound containing the switchgear and transformers required to power the pumps;
- A new section of intake structure, connecting the pumps to the existing tailrace;
- New buried pipelines to take the water from the two new pumps to connect into (up to) three of the existing four penstocks;
- Reconfiguration of Sloy Hydroelectric Power Station internal road for vehicular access;
- Reinstatement of areas affected by construction of the Proposed Development with new profiled earthworks, and planting;
- Dismantling (to enable construction access) and reinstatement of Sloy Hydroelectric Power Station's listed northern entrance gates, gate pillars and a short section of walling;
- Creation of a site establishment area in the woodland to the north of the existing Sloy Hydroelectric Power Station and an area for on-site storage of excavated rock spoil;
- Regrading of the main construction compound / site establishment area and the reinstatement of the area to an improved condition to the existing, in order to achieve the Applicant's biodiversity net gain (BNG) targets; and
- Creation of a secondary construction compound / site establishment area and vehicle holding area in the overflow car park to the north of the Inveruglas Visitor Centre car park, including permanent upgrades to the access junction and reinstatement post-construction.

The principal components proposed are described in more detail below.

## 2.2. Proposed Development Components

### 2.2.1. Buildings

A new surface building would be required to house electrical switchgear, pump infrastructure and a gantry crane. The Applicant commissioned the services of award winning, Glasgow based architects, Page \ Park to undertake the design concepts of the proposed above ground elements.

A high-quality contemporary building is proposed (as was the case for the consented pumped storage scheme). The building would be positioned perpendicularly to the existing Sloy Hydroelectric Power Station and would comprise a main hall with vehicular access and laydown areas with space to the rear of the building to house electrical switchgear and control systems. The main hall would house an overhead travelling gantry crane, to accommodate the crane the building is likely to be up to 18m in height.

### 2.2.2. Underground Pump Hall

An underground pump hall would be required to house the two pumps. This would link to the intake structure and would be approximately 18m deep, below existing ground level with some localised areas up to 20m deep.

### 2.2.3. Pumps

The pumping plant would comprise two pumps installed below ground level adjacent to the northern tailrace wall. The power demand of each pump would be 40-50MW. Power supply for the pumps would be taken from the grid point of connection to the rear of the main building. A small transformer compound would be required close to the pumphouse building containing the switchgear and transformers needed to operate the pumps, this would be connected to the pumphouse via buried cables.

### 2.2.4. Intake Structure and Tailrace

The purpose of the intake structure would be to provide a water passage from Loch Lomond to the new pumps. The intake structure would connect into the northern wall of the existing tailrace. Permanently installed trash and fish screening, with an automated cleaning system designed in accordance with the Scottish Environment Protection Agency (SEPA) guidance, would be required across the pump intake structure.

### 2.2.5. Buried Pipeline

New buried pipelines would be required to take water from the pumps to connect into up to three of the existing 2.4m diameter penstocks in a concrete anchor block approximately 40m from the power station. A small section of random rubble walling that surrounds the existing surface pipelines would need to be removed and replaced in order to make this connection. There may also be the requirement for a valve chamber at each penstock connection.

### 2.2.6. Excavated Materials

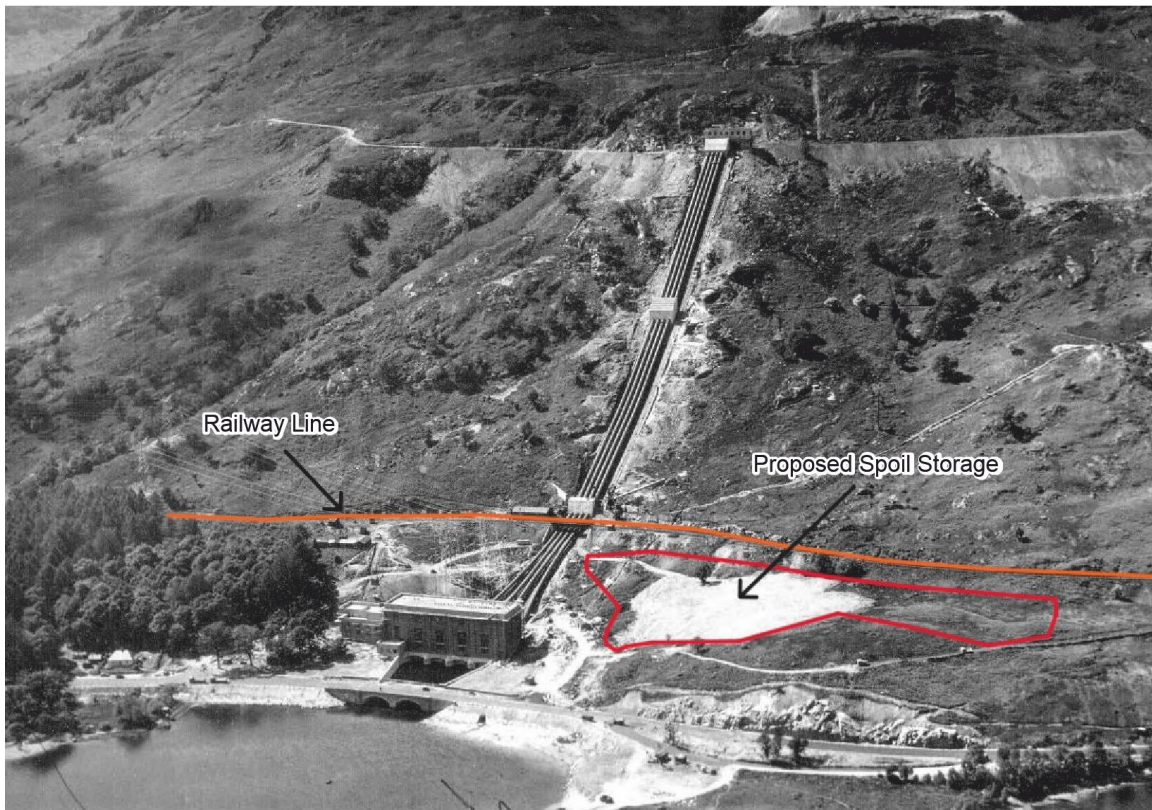
The proposed construction activities would result in a maximum of 40,000m<sup>3</sup> of excavated rock (bulked). While this is the volume to be considered in the EIA Report, this is the worst-case scenario and the final volume would be dependent on the type of pump selected during the next design stage, post Section 36 submission. The final volume is expected to be more likely in the region of 29,000m<sup>3</sup>.



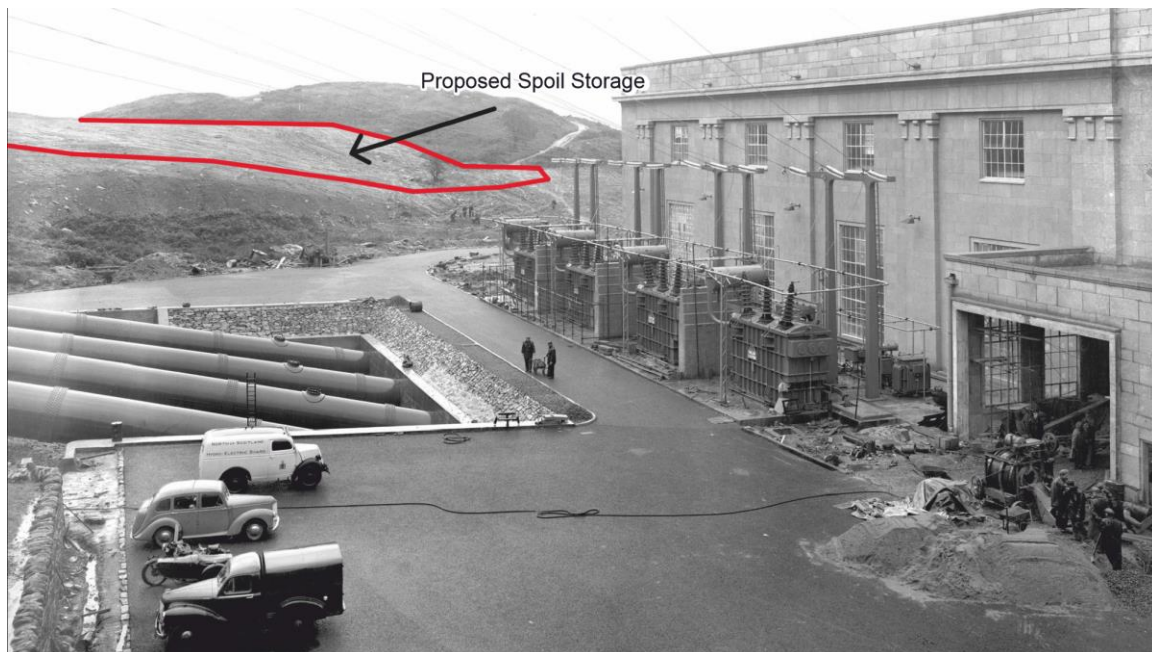
The excavated rock would be used productively in the construction of the new works, where feasible. However, it is envisaged that there would be a surplus of excavated rock spoil, overall.

Environmental surveys have confirmed that the preferred area on-site for the storage of rock spoil would be to the north of the existing Sloy Hydroelectric Power Station, adjacent to the main site establishment area, (see **Figure 2**). This would require clearance of an area of woodland which was previously used during the construction of the existing Sloy Hydroelectric Power Station (see **Plate 1 and 2**). Woodland has established in this area since construction in the 1950s, however, it is in generally poor condition as a result of grazing pressures and the presence of invasive non-native plant species (INNPS). In addition to this, LLTNP Authority (LLTNPA) has highlighted that the larch within the area will require felling in the future to limit the spread of Larch disease which is a problem nationwide.

**Plate 1: View of Sloy Hydroelectric Power Station during construction circa 1950.**



**Plate 2: View of the rear of Sloy Hydroelectric Power Station during construction circa 1950.**



Upon completion of the construction works, and in conjunction with conventional suppression techniques, spoil would be spread over the area to help eradicate the INNS. The area would be reprofiled, covered in topsoil, seeded and planted to ensure an improved habitat would be established, the area would also be fenced to protect the area of new woodland from grazing. This would also reduce the need for rock spoil to be transported off site via the public road network.

For the purpose of the EIA Report two spoil management scenarios are to be assessed based on which forms the worst-case for the individual chapters.

- Approximately 40,000m<sup>3</sup> of spoil to be kept on site in area to the north of the existing power station; and
- Approximately 12,000m<sup>3</sup> of spoil to be kept on site in area to the north of the existing power station to suppress invasive species. Approximately 28,000m<sup>3</sup> of spoil to be transported off site south along the A82/A83 to be used on Forestry and Land Scotland (FLS) or RTS Forestry projects or similar in the area.<sup>1</sup>

The Applicant has undertaken a review of the woodland to determine the extent of clearance that would be required to accommodate the spoil storage area and remove the larch while maintaining a windfirm edge for the remaining woodland. The review confirmed that the existing buffer of broadleaved trees along the A82 would be retained to maintain a visual screen. But that a large part of the woodland would need to be felled.

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<sup>1</sup> Initial discussions have been held with FLS and RTS Forestry to understand their requirements for excavated rock in the area. It was determined that there are a number of track construction, improvement and maintenance projects in the area whose timescales are expected to align with the Proposed Development which will require rock of the type anticipated to be excavated.

### 2.2.7. Temporary Construction Compound and Site Establishment Area

A main construction compound / site establishment area would be created to the north of the existing power station. The use of this area would require the clearance of an area of woodland prior to commencement of construction activities.

It is anticipated that a secondary construction compound / site establishment area and vehicle holding area, would be constructed in the overflow car park to the north of the Inveruglas Visitor Centre car park for the duration of the construction activities. It is proposed that the secondary construction compound / site establishment area and vehicle holding area would be completely segregated from the public car park to the south and accessed via the junction to the north, which is not currently in-use.

The existing junction into the overflow car park is currently only safely accessible from the southbound A82, so improvement works would be required to enable safe access and egress to / from both the north and south. The central vegetated 'island' area within the overflow car park would be cleared temporarily, to enable an adequate area to be created for vehicles to turn safely. No construction vehicles would be allowed to enter the public car park at Inveruglas and the gate between the two parking areas would remain closed for the duration of the works. Following completion of the construction works, the improved road junction would remain, for the safe exit of recreational vehicles, and the area would be reinstated, with the central 'island' replanted.

### 2.2.8. Access

There are two existing bellmouth junctions off the A82 at the Sloy Hydroelectric Power Station. The southern junction is used for day-to-day operations, the northern junction acts as a secondary access and the gates are normally locked. As was the case for the consented scheme, it is anticipated that the northern junction would be used exclusively by construction vehicles during the construction of the Proposed Development. This would allow construction traffic to be separated from operational traffic while utilising an existing access junction. The internal road alignment to the north of the existing power station would need to be reconfigured to accommodate the footprint of the Proposed Development.

To facilitate construction of the Proposed Development, the existing northern gates, gate posts and a short section of walling (which are all part of the Category A listed Sloy Hydroelectric Power Station schedule) would be carefully dismantled and stored prior to construction, to enable sufficient junction width for the maximum swept path of anticipated delivery vehicles. The junction would be fully reinstated in its current location upon completion of construction. This work would require Listed Building Consent (as it was for the previously consented scheme) and would be subject to further discussion with LLTNPA and Historic Environment Scotland (HES).

Consultation has taken place with Transport Scotland regarding the temporary use of the northern junction onto the A82, and details of the agreed outcome of these discussions will be included in the EIA Report.

## 3. Design Evolution

### 3.1. Design Evolution

The Applicant has held numerous meetings with statutory consultees during the design phase of the Proposed Development and this has played an integral part in the design evolution process. In particular, due to the location of the Proposed Development being within the LLTNP, consultation with LLTNPA was initiated from an early stage. Further information on the consultation that has been undertaken with statutory consultees in relation to the design of the Proposed Development is provided in **Section 4**.

The key changes to the Proposed Development since the Scoping Opinion was received are in relation to the proposed building design and spoil management. A full description of the design evolution of the Proposed Development will be provided in the EIA Report, however, the key design changes have been summarised below.

#### 3.1.1. Building Design

The design of the building, in terms of location and footprint, is largely constrained by engineering and technical requirements, however, the materials, aesthetic and building height have been carefully considered and consulted on with LLTNPA and Historic Environment Scotland (HES). The current setting of the existing Sloy Hydroelectric Power Station, which is a Category A Listed building, as well as consideration to the surrounding landscape of the National Park and other structures within the LLTNP, have been fundamental in the design process.

Meetings were held online on 23<sup>rd</sup> August 2023 and 7<sup>th</sup> November 2023 with representatives of LLTNPA and on 13<sup>th</sup> September 2023 with representatives of HES followed by a further design progress discussion on 28<sup>th</sup> September 2023.

There were 3 main issues raised and addressed through these meetings:

- The need to ensure the new extension is subservient to the existing building;
- How to maximise exposure of the machinery within the building, without dominating the Category A listed setting; and
- Clarity on the building materials proposed.

Concept designs were presented to both LLTNPA and HES with feedback recorded noting the positive impact that the proposed extension could have to draw attention to the existing building and increase its prominence. There was notable support for maximising the visibility of the internal machinery and an acknowledgement of the need to balance the exposing of the building function and contributing to the cultural heritage, while not dominating the Category A listed building and setting.

Further to this, a key consideration was the balance required between the height of the building and the required excavation depth, (and resultant excavation of spoil material). A lower building height would involve a greater excavation depth and therefore larger volumes of spoil. A lesser volume of spoil is more desirable but would require a taller building.

At follow-up meetings with LLTNPA and HES a revised approach was presented in response to the initial feedback shared. These proposals reduced the scale of the rear section of the building while maximising the height of the new pumping hall. Feedback recorded noted the improvement to the design, the proportions of the proposal, and the positive relationship with the context.

The preferred approach, developed in liaison with LLTNPA and HES, has been further refined, and forms the basis of the Proposed Development. Further details on the design development will be presented in the Design Statement.

### 3.1.2. Spoil Management

Based on the above evolution of the building concept design, including building height, the maximum volume of spoil from excavation which would be required for the underground pumps was calculated to be 40,000m<sup>3</sup>. This assumes that the Proposed Development would use horizontal pumps which would require a greater excavation volume than vertical pumps, as a worst-case scenario. However, the final decision on the type of pumps cannot be made until the Applicant has gone through the development of the design with pump suppliers.

It has been agreed that as far as possible, spoil would be reused productively on-site for the Proposed Development, however, an amount of excess spoil is expected. As the Proposed Development is located within a sensitive location, within the LLTNP, and the adjacent and wider area is popular with tourists and other recreational users accessing the loch and popular walking routes in the area, keeping construction related traffic to a minimum is a key consideration. Access to and from the Proposed Development is constrained by use of the adjacent A82 trunk road which, despite being a single carriageway road, is utilised by a large volume of traffic.

An optioneering exercise was undertaken to assess if there were suitable spoil storage locations within close proximity to the site. The former Coiregrogain Quarry located on land owned by the Developer was considered, but determined to be unsuitable due to technical considerations, access constraints and safety including potential conflicts with hill walkers using the access track. As a result, it was considered that the full amount of spoil volume may be required to be accommodated on-site permanently. As described in Section 2.2.6 this would be in the northern wooded area which had been previously cleared and used for the storage of rock spoil from construction of the existing scheme.

Further information on how the storage of spoil would be managed on-site was prepared and issued to LLTNPA for consideration. Comments received through ongoing consultation with LLTNPA and consultations received through the Scoping Opinion, resulted in alternative spoil management strategies being explored in more detail. The key changes to the spoil management strategy are that the two alternatives are to be assessed as part of the EIA, depending on the worst-case scenario for each environmental discipline. One scenario will consider approximately 40,000m<sup>3</sup> of spoil being kept on site in the wooded area to the north of the existing power station, the second scenario will consider approximately 12,000m<sup>3</sup> of spoil being kept on site in the wooded area to the north of the existing power station to help suppress invasive species. Approximately 28,000m<sup>3</sup> of spoil would be required to be transported off site along the A82 to the north and / or south to be used on Forestry and Land Scotland (FLS) projects, RTS Forestry projects or similar.<sup>1</sup>

In addition to the two reasonable 'worst-case' scenarios to be assessed as part of the EIA, a commitment will be made to achieving a 'best-case' scenario for spoil management. Design options that will help achieve this will be discussed within the design alternatives chapter and include:

- Alternative pump design options that would result in lower 'worst case' spoil volumes (likely in the region of 29,000m<sup>3</sup>);
- Alternative building design options which may further reduce the spoil volumes;
- Alternative on-site spoil storage options based on smaller spoil volumes; and
- Alternative and additional options for off-site use of spoil storage.

## 4. Consultation

### 4.1. Scoping Stage

A formal request for a Scoping Opinion was made to the Scottish Ministers under Regulation 12 of the EIA Regulations on 23<sup>rd</sup> June 2023. A Scoping Report was submitted to support the request, which sought input from statutory and non-statutory consultees regarding the information to be provided within an EIA Report to accompany a section 36 application under the Electricity Act 1989.

A Scoping Opinion was subsequently provided by the Scottish Ministers on 13<sup>th</sup> December 2023, which has been considered in detail during the EIA process. A matrix detailing the key issues that were raised throughout the scoping stage is included in **Annex 1** and summarised in **Section 4.4**.

### 4.2. Post-Scoping Stage

Following submission of the Scoping Report, in June 2023, the Developer has engaged in further consultation with a number of key stakeholders via email, and also via meetings in person, on site, or via virtual meetings.

A number of meetings were held with LLTNPA throughout the design process, comprising:

- An initial meeting in person at LLTNPA headquarters to introduce the scheme on 27<sup>th</sup> April 2023;
- A site visit on 18<sup>th</sup> May 2023 with representatives from LLTNPA planning and ecology team to see the site first hand;
- A virtual meeting was held on 23<sup>rd</sup> August 2023 to discuss the design concept for the Proposed Development to both LLTNPA and Argyll and Bute Council (A&BC) representatives;
- A virtual meeting was held on 7<sup>th</sup> October 2023 to provide an update for LLTNPA and A&BC on the concept design of the building;
- A further virtual meeting was held with LLTNPA on 7<sup>th</sup> November 2023 to provide an update on the building design and spoil management; and
- A site visit including a walkover of the proposed area with representatives from LLTNPA was held on 15<sup>th</sup> February 2024 to discuss the agreed approaches to be taken forward for the EIA in regard to spoil management, and tree removal. The location of Visualisation Location (VL) photomontages was also agreed at this site visit.

Meetings were held with HES to discuss the building design concepts. These comprised an initial virtual meeting held on 13<sup>th</sup> September 2023 to discuss the concept design of the building, feedback was given and a follow-up virtual meeting took place on 28<sup>th</sup> September 2023 when the concept was agreed.

Other meetings included:

- A virtual meeting was held with Transport Scotland on 22<sup>nd</sup> May 2023.
- A virtual meeting to introduce and discuss the project was held with SEPA on 6<sup>th</sup> July 2023
- A virtual meeting to introduce and discuss the project was held with NatureScot on 13<sup>th</sup> July 2023.
- A site visit was hosted on 10<sup>th</sup> August 2022 for Friends of Loch Lomond and Arrochar and Tarbet Community Council.

Further consultation has also been undertaken by email with the following consultees:

- ECU;
- Scottish Water;
- Marine Scotland;
- Forestry and Land Scotland;

- Loch Lomond Angling Improvement Association; and
- Loch Lomond Fisheries Trust.

Consultation associated with the Proposed Development will be detailed in the EIA Report.

### 4.3. Public Exhibition

Two public exhibitions were held locally at Scoping stage on the following dates:

- Three Villages Hall, Arrochar, Tuesday 25 July 2023, 15:00-19:00; and
- Three Villages Hall, Arrochar, Wednesday 1 November 2023, 15:00-19:00.

To ensure early public engagement about the Proposed Development, the Applicant undertook the following steps:

- Posters were displayed at the Public Exhibition venue, community notice boards and where possible at local amenities during the exhibitions;
- Local stakeholders, including community councils, community groups and elected representatives were contacted by email;
- Adverts were placed in the following:
  - Billboard Digital Display Advertising (Helensburgh Advertiser and Dumbarton and Vale of Leven Reporter) – 15/07/2023 for 11 days and 24/10/2023 for 9 days.
  - Digital Display Advertising (Helensburgh Advertiser and Dumbarton and Vale of Leven Reporter), Double Height MPU, 15/07/2023 for 11 days and 24/10/2023 for 9 days.
  - Facebook Engage Local Boost (Helensburgh Advertiser and Dumbarton and Vale of Leven Reporter), 14/07/2023 for 7 days and 25/10/2023 for 7 days.
  - Facebook Engage Local Post (Helensburgh Advertiser and Dumbarton and Vale of Leven Reporter), 14/07/2023 and 25/10/2023.
  - Helensburgh Advertiser (print edition), 16x4, 20/07/2023 and 26/10/2023 (one insert each time).
- Content was posted on SSE Renewables' social media channels.

A project website is also available for the public to view online which provides the general details of the project (<https://www.sserenewables.com/hydro/sloy-awe/sloy-power-station-redevelopment-plans/>).

### 4.4. Key Scoping Issues

The Scoping Opinion made reference to site specific issues of interest to the Scottish Ministers that should be considered and addressed, in addition to those laid out in responses from consultees. The issues raised by Scottish Ministers are set out below. Specific responses from statutory and non-statutory consultees are included within Appendix 1.

#### 4.4.1. EIA Application and Scope

On the topic of the EIA application and scope, the Scottish ministers noted that:

*“Scottish Ministers expect the EIA report which will accompany the application for the proposed development to consider in full all consultation responses attached in Annex A.”*

*“Scottish Ministers are satisfied with the scope of the EIA set out at Chapter 5 of the scoping report.”*

A scoping matrix can be found in Appendix 1 of this document, summarising all consultation comments received as part of EIA scoping process. The scoping matrix also describes and identifies where within the EIA Report scoping comments have been addressed, where relevant. The EIA Report for the Proposed Development will also include a Scoping Matrix as an appendix.

#### 4.4.2. Drinking Water and Water Assets

On the topic of drinking water and water assets, the Scottish ministers noted that:

*“Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water... and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.”*

*“Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.”*

Scottish Water have been contacted to request information on any assets within proximity of the Proposed Development including the Belmore Water Treatment Works (WTW). A combination of desk studies and site survey work have been undertaken to ascertain the presence of any private water supplies which could be impacted by the Proposed Development. The “Soils, Geology and Water Environment” Chapter of the EIA Report will contain details of any assets and / or private water supplies identified, assess likely impacts and set out suitable mitigation measures, where required. Discussions with Scottish Water are ongoing to agree further survey methods including water sampling and process review to establish any potential effects on Belmore WTW and any mitigation measures that may be required.

#### 4.4.3. Fish and Fisheries

On the topic of fish and fisheries, the Scottish ministers noted that:

*“MD-SEDD [Marine Directorate-Science, Evidence Data and Digital] provide generic scoping guidelines for onshore wind farm and overhead line development... which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm or overhead line development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during an EIA process.”*

*“In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.”*

All relevant guidelines and best practise have been followed when undertaking the aquatic ecology assessment which will be included in the EIA Report. Fish are not a qualifying interest of the Loch Lomond Woods Special Areas of Conservation (the nearest SAC to the Proposed Development). Loch Lomond Fisheries Trust and Loch Lomond Angling Improvement Association have been contacted for up-to-date information on fish populations.



#### 4.4.4. Peat Landslide Management

On the topic of peat landslide management, the Scottish ministers noted that:

*“Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at <http://www.gov.scot/Publications/2017/04/8868>, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.”*

A PLHRA has not been prepared as no peat rich soils or peat deposits are recorded within the study area. Although some of the trial pits dug in 2010, recorded peat, these are all located in the on ground of shallow relief that was recorded as waterlogged at the time of the site walkover survey. It is considered likely therefore that the trial pit logs record saturated organic soils rather than peat. This is confirmed by published mapping. Details on this data will be included in the “Soils, Geology and Water Environment” Chapter of the EIA Report.

#### 4.4.5. Landscape and Visual Impact

On the topic of landscape and visual impact, the Scottish ministers noted that:

*“The scoping report identified that a landscape and visual impact assessment will be undertaken for the proposed development to identify any potential landscape and visual effects.”*

A Landscape and Visual Impact Assessment (LVIA) has been undertaken in accordance with GLVIA3 and will be included in the EIA Report. The EIA Report will also include photomontages from the following Visualisation Locations (VLs), as agreed with LLTNP Authority:

- VL1: Inveruglas Car Park;
- VL2: The A82 (near the southern entrance of the existing Sloy Power Station);
- VL3: Inveruglas Visitor Centre Terrace; and
- VL4: Inversnaid Hotel Car Park.

#### 4.4.6. Noise

On the topic of noise, the Scottish Ministers noted that:

*“The noise assessment should be carried out in line with relevant legislation and standards as detailed in Chapter 6 section 6.8 of the scoping report.”*

A noise assessment has been carried out in line with relevant legislation and standards as outlined in the Scoping Report and will be included in the EIA Report.

#### 4.4.7. Further Consultation

On the topic of further consultation, the Scottish ministers noted that:

*“Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, [and] cumulative assessments and request that they are kept informed of relevant discussions.”*

The EIA Report will outline and describe the pre-application consultation undertaken, together with the outcomes of this consultation with relevant statutory and non-statutory consultees.

#### 4.4.8. Mitigation

On the topic of mitigation, the Scottish ministers noted that:

*“The Scottish Ministers are required to reach a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.”*

Mitigation measures will be set out at the end of each technical chapter of the EIA Report, as relevant. All mitigation measures will be consolidated into a Schedule of Mitigation, to be included as an appendix to the EIA Report.

## 5. Submission Information

### 5.1. Submission

It is the intention to submit a Section 36 application for the Proposed Development in July 2024.

### 5.2. Advertisement

In accordance with Regulation 4 of the Electricity (Applications for Consent) regulations 1990, and Regulation 14 of the EIA Regulations, the application will be advertised in the Edinburgh Gazette, a national newspaper, and a local newspaper (to be agreed in consultation with ECU). It is proposed to advertise the application in The Scotsman, the Edinburgh Gazette, Helensburgh Advertiser.

In agreement with the ECU, the advert will describe the application, state where hard copies of the EIA Report are located, state a date by which any persons can make representations to the Scottish Ministers in relation to the application, and the address to where representations are to be sent. It is anticipated that the Applicant will arrange for hard copies of the EIA Report to be issued to the LLTNP offices, Carrochan, Carrochan Road, Balloch, G83 8EG.

### 5.3. Public Viewing of EIA report

In accordance with Regulation 18 of the EIA regulations, copies of the EIA report will be available to view on the application website at: <https://www.sserenewables.com/hydro/sloy-awe/sloy-power-station-redevelopment-plans/> Hard copies of the EIA Report will also be available to view at the following locations:

- LLTNP Authority Offices;
- Other locations to be agreed with ECU; and
- Additional copies will be made available subject to a reasonable fee when requested.

### 5.4. Consultee List

The list of consultees to be sent a copy of the submitted EIA Report will be agreed with the ECU. It is anticipated to include those consultees consulted during the scoping process, and any other stakeholders the Applicant or ECU are aware of with a potential interest in the project or its potential effects, as noted in Table 5.1.

**Table 5.1: Consultees to be informed of the EIA Report**

Statutory Consultees	
ECU	SEPA
Argyll and Bute Council	NatureScot
Loch Lomond and the Trossachs National Park Authority	Transport Scotland
Historic Environment Scotland	Marine Scotland Science
Scottish Forestry	

<b>Non-Statutory Consultees</b>	
Argyll District Salmon Fisheries Board	Network Rail
British Telecommunications plc	RSPB Scotland
Cruise Loch Lomond	Scottish Wild Land Group
Fisheries Management Scotland	Scottish Wildlife Trust
John Muir Trust	Scotways
Joint Radio Company Limited	Visit Scotland
Loch Lomond Fisheries Trust	West of Scotland Archaeology Service
Mountaineering Scotland	Woodlands Trust
<b>Community Councils and Local Groups</b>	
Arrochar, Tarbet and Ardlui Community Council	

## 5.5. Conclusion

The Applicant welcomes any comments that the ECU or any of the statutory consultees may have in relation to this Gate Check Report.

## Annex 1 Gate Check Matrix

#	Subject	Summary of Response	Consultee	Page ref:	Response / Comments
1	Scoping Consultations	Scottish Ministers expect the EIA report which will accompany the application for the proposed development to consider in full all consultation responses attached in Annex A.	ECU01	5	Noted. The EIA Report will include a Scoping Matrix, detailing how comments in the ECU Scoping Opinion have been addressed in the EIA Report.
2	EIA Scope	Scottish Ministers are satisfied with the scope of the EIA set out at Chapter 5 of the Scoping Report	ECU02	5	Noted.
3	Scottish Water Assets	Scottish Water (SW) provided information on whether there are any drinking water protected areas or SW assets on which the development could have any significant effect. Scottish Ministers request that the company contacts SW and makes further enquires to confirm whether there any SW assets which may be affected by the development, and includes details in the EIA Report of any relevant mitigation measures to be provided.	ECU03	6	SW have been contacted to request information on any assets within proximity of the Proposed Development including Belmore WTW. This information will be included in the “Soils, Geology and Water Environment” Chapter of the EIA Report, together with suitable mitigation measures, where required.
4	Private Water Supplies	Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided	ECU04	6	The “Soils, Geology and Water Environment” Chapter of the EIA Report will contain details of any private water supplies identified, assess likely impacts and set out suitable mitigation measures, where required.
5	Fisheries	The EIA should consider the Marine Directorate – Science Evidence Data and Digital (MD-SEDD) generic scoping guidelines for onshore wind farm and overhead line development which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm or overhead line development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.	ECU05	6	Noted.

6	Fisheries	In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.	ECU06	6	The qualifying features of the Loch Lomond Woods Special Areas of Conservation (the nearest SAC to the Proposed Development) are western acidic oak woodland and otter. Other SACs have been scoped out of the assessment.
7	Peat Landslide Hazard Risk Assessments	Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.	ECU07	6	A PLHRA has not been prepared as no peat rich soils or peat deposits are recorded within the study area. Although some of the trial pits dug in 2010, recorded peat, these are all located in the on ground of shallow relief that was recorded as waterlogged at the time of the site walkover survey. It is considered likely therefore that the trial pit logs record saturated organic soils rather than peat. This is confirmed by published mapping. Details on this data will be included in the "Soils, Geology and Water Environment" Chapter of the EIA Report.
8	LVIA	A landscape and visual impact assessment will be undertaken for the proposed development to identify any potential landscape and visual effects.	ECU08	6	The Landscape and Visual Impact Assessment (LVIA) has been undertaken in accordance with GLVIA3 and will be included within the 'LVIA' Chapter of the EIA Report.
9	Noise	The noise assessment should be carried out in line with relevant legislation and standards as detailed in Chapter 6 of the Scoping Report.	ECU09	7	A noise assessment has been carried out in line with relevant legislation and standards as outlined in the Scoping Report and will be included in the EIA Report.
10	Further Consultation	Scottish Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments, and request that they are kept informed of relevant discussions.	ECU10	7	This has been noted. The Energy Consents Unit have been kept informed of further discussions with consultees.

11	Mitigation Measures	The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.	ECU11	7	Mitigation measures will be proposed at the end of each technical chapter. A consolidated Schedule of Mitigation will also be presented as an appendix to the EIA Report.
12	Further Consultation	It is acknowledged that the environmental impact assessment (EIA) process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required and would request that they are kept informed of on-going discussions in relation to this	ECU12	7	This has been noted. The Energy Consents Unit have been kept informed of further discussions with consultees.
13	ECU Consultation	Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit (ECU) at the pre-application stage and before proposals reach design freeze.	ECU13	8	The Applicant has been in regular contact with the ECU during the pre-application stages.
14	Scoping Matrix	When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.	ECU14	8	The EIA Report will include a Scoping Matrix, detailing where comments in the Scoping Opinion are addressed in the EIA Report.
15	EIA Report Structure	It should be noted that to facilitate uploading to the Energy Consents portal, the EIA report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes (MB).	ECU15	8	Noted
16	MOD Safeguarding	This application relates to a site outside of Ministry of Defence safeguarding areas. The Ministry of Defence has no concerns with this proposal as outlined in the Scoping Report	DIO01	A1	Noted
17	HES Cumulative Assessment	The cumulative impacts of the proposed development in combination with other developments in the vicinity to be assessed.	HES01	A4	The criteria for assessment of cumulative effects are set out in in the 'Cultural Heritage' Chapter, which will include assessment of cumulative impacts of the Proposed Development.

18	Scope	Content with the approach set out in the scoping but would be happy to provide further information and advice as the design and assessment process develops.	HES02	A4	Noted. Any further consultation undertaken with HES will be detailed in the 'Scoping and Consultation' Chapter of the EIA Report.
19	Study Area	Concerned about the size of the study area proposed for cultural heritage interests. However, given specific nature of the area, HES are content that all designated assets likely to be impacted by the development have been identified. The same may not be true for undesignated assets. HES usually expect a ZTV to be used to establish potential impacts on assets but content that extending the study area or using a ZTV would make no difference to HES's remit.	HES03	A5 / A8	Noted.
20	Category A Listed Sloy Power Station	The development is likely to result in direct physical impact on the fabric of the Category A listed building and will require listed building consent.	HES04	A6	An assessment of the potential impacts of the Proposed Development on the Category A Listed Building will be included in the 'Cultural Heritage' chapter. A Listed Building Consent application will be submitted in tandem to the Section 36 Application.
21	Category A Listed Sloy Power Station	The development has potential for significant impacts on the setting of the power station and expect impacts to be mitigated as designs are developed. Final proposal should demonstrate the new building will not adversely impact the setting of the Cat A building in its immediate and longer views (from Loch Lomond and A82).	HES05	A6	An assessment of the potential impacts of the Proposed Development on the setting of this heritage asset is included in the 'Cultural Heritage' Chapter
22	Visualisations	Visualisations recommended to be included. Lack of detail on the development makes it difficult to offer advice on VP locations. Wireframe and photomontage visualisations are a useful tool in assessing and illustrating setting impacts and are expected to be included in the EIA Report.	HES06	A6 / A8	The EIA Report will include visualisations to NS Standards. Assessment of the potential impacts of the Proposed Development on the setting of these heritage asset is included in the 'Cultural Heritage' Chapter
23	Inveruglas Castle SM	Minor changes in keeping with the established industrial aesthetic of the power station would unlikely have an impact of national significance upon the Inveruglas Castle SM. Every reasonable step should be taken to minimise impact on the setting.	HES07	A7	Assessment of the potential impacts of the Proposed Development on the Inveruglas Castle (SM 9264) is included in the 'Cultural Heritage' Chapter.



24	Inveruglas Castle SM	A photomontage should be produced towards the development from the NW shore of the island.	HES08	A7	Following further consultation, HES (13/09/2023) advised that a photomontage from the northwest shore of the island upon which Inveruglas Castle (SM 9264) is situated was not required to be included in the EIA Report. A wireline view will be included in the EIA Report.
25	Listed Building Consent	Listed Building consent is required for works to the gate piers and boundary walls. It may also be required for works in section 2.3 of the scoping report.	HES09	A7	A Listed Building Consent application will be submitted in tandem to the Section 36 Application
26	Planning Policy and Context	Given the requirement for listed building consent, HES would have expected relevant policy to be noted under section 2.3 and/or Cultural Heritage of the scoping report. The EIA process should also take into consideration the Historic Environment Policy for Scotland (2019).	HES10	A7	Reference to relevant policy, including the Historic Environment Policy for Scotland (2019), will be included in the Cultural Heritage, and Planning Policy Context chapters, as appropriate.
27	Planning	The EIA should summarise and give due consideration to the following policy documents: * LLLTNP LDP 2017-2021 (in place to 2024) and Renewable Energy Supplementary Guidance (which includes PSH)	LLTNPA01	A12	The 'Planning Policy and Context' Chapter will give consideration to the relevant policy documents.
28	Planning	The four statutory aims of the NP will be a material consideration. The EIA should include a thorough assessment of the proposed development with respect to the aims of the NP: National Parks (Scotland) Act 2000	LLTNPA02	A12	The 'Planning Policy and Context' Chapter will give consideration to the Aims of the National Park.
29	Planning	The National Park Partnership Plan (2018-2023) is a material consideration and the Draft Partnership Plan 2024-2029.	LLTNPA03	A12	The 'Planning Policy and Context' Chapter will give consideration to the National Park Partnership Plan and the Draft Partnership Plan.
30	Planning	The EIA Report must contain at least the info specified in Schedule 4 of the 2017 EIA Regulations	LLTNPA04	A13	The EIA report will include the information specified in Schedule 4 of the 2017 EIA regulations
31	Water Management and Hydrological considerations	The National Park Planning Authority defers to Scottish Water's position on technical matters relating to water management and hydrological considerations	LLTNPA05	A13	Noted

32	Biodiversity	<p>To allow a thorough assessment against Policy 3 and Policy 6 of NPF4, the following additional information should be submitted as part of the EIA Report:</p> <ul style="list-style-type: none"> <li>* an appraisal to demonstrate how the proposal will conserve, restore and enhance biodiversity so that it is in a demonstrably better state than prior to the commencement of the project.</li> <li>* The appraisal shall demonstrate how criteria i to v in NPF4 Policy 3 will be met and include a scheme for the significant enhancement of biodiversity.</li> </ul> <p>The enhancement scheme shall contribute towards the objectives of the NPA Future Nature Route Map and improve the condition and extent of the 3 key habitat networks: woodland, peatland and water.</p>	LLTNPA06	A13	The EIA Report will include details on how the Proposed Development will enhance biodiversity informed by a biodiversity net gain assessment.
33	Biodiversity	<p>Assessment carried out for the A82 upgrade identified native woodland restoration and expansion opportunities in vicinity of the proposal. The NP Trees and Woodland Strategy identify preferred and potential area for native woodland creation adjacent to the site. These opportunities should be explored further.</p>	LLTNPA07	A13	Native woodland creation is detailed in the 'Ecology' Chapter of the EIA Report. A Landscape Mitigation Plan informed by a biodiversity net gain assessment will be included in the EIA Report.
34	Biodiversity	<p>The application site is within a network of B-Lines (wildflower). The potential to create wildflower-rich areas around existing and proposed infrastructure, where tree planting would not be possible, should be explored.</p>	LLTNPA08	A13	Habitat creation to benefit invertebrates is detailed in the 'Ecology' Chapter.
35	Biodiversity	<p>Opportunities to compliment the enhancement required for the adjacent transformer replacement project should be explored.</p>	LLTNPA09	A13	The Applicant has been in regular contact with SSEN and will continue to do so to ensure smooth delivery of both projects.
36	Biodiversity	<p>The National Park are keen to work in partnership with the applicant to identify appropriate enhancement opportunities.</p>	LLTNPA10	A13	The Applicant has been in regular contact with the LLTPA. Any further consultation will be detailed in the "Scoping and Consultation" Chapter of the EIA Report.

37	Habitats	There is a strong presumption against the removal and fragmentation of UK BAP Priority Habitats in CWRP. The policy will only support where it will achieve significant additional public benefits. Recommended that impacts on existing native woodland (particularly 2 UK BAP Priority habitats identified) are avoided.	LLTNPA11	A14	Assessment of the potential impacts of the Proposed Development on native woodland and priority habitats will be included in the 'Ecology' Chapter of the EIA Report.
38	Habitats	All semi natural broadleaved woodland should be subject to NVC survey and the results used to inform the layout of the proposal.	LLTNPA12	A14	Noted, this information will be provided in the "Ecology" Chapter of the EIA Report (and associated appendices).
39	Habitats	The need for woodland removal should be justified in the EIA along with mitigation measures and options that the applicant has considered and assessed. Including alternative options for storage and reuse of excavated rock spoil.	LLTNPA13	A14	The need for woodland removal, options considered and assessment of the potential impacts will be provided in the 'Site Selection and Design Evolution' and 'Ecology' Chapters of the EIA Report.
40	Habitats	Where woodland removal is justifiable, the compensatory planting area must exceed the area of woodland removed to compensate for the loss of environmental value.	LLTNPA14	A14	The Developer and Applicant are committed to undertaking compensatory planting for the loss of woodland removed. Details will be included in the EIA Report.
41	Trees	A tree survey should be carried out for the scattered broadleaved trees likely to be affected within the power station grounds to identify individual impacts and identify mitigation. Where impacts cannot be avoided, replacement tree planting should be identified in the EIA to compensate for any losses.	LLTNPA15	A14	A tree survey has been undertaken and details will be included in the 'Ecology' Chapter of the EIA Report. Where impacts cannot be avoided, appropriate mitigation will be outlined.
42	GWDTE	Welcomed that targeted NVC surveys are carried out on areas identified as potential GWDTE. The assessment should consider the potential for indirect effects on these habitats as a result of hydrological changes.	LLTNPA16	A14	Results of a targeted NVC survey and potential effects, including indirect effects, on potential GWDTE habitats, will be included in the 'Ecology' and 'Soils, Geology and Water Environment' Chapters of the EIA Report.
43		The survey results should inform the design. Where it is not possible to avoid, suitable restoration and/or compensation measures should be identified in the EIA.	LLTNPA17	A14	The EIA will identify suitable restoration and/or compensation measures for potential impacts on GWDTE habitats, where it has not been possible to avoid these habitats. This will be included in the 'Ecology' Chapter of the EIA Report.

44	INNS	Support the implementation of an INNS management plan. Consideration should be given to the eradication of INNS from all land under the control of the applicant to contribute towards the delivery of biodiversity enhancement.	LLTNPA18	A15	Measures for the management of INNS will be included in the CEMP. The removal, with aim to eradicate, INNS will also form part of the spoil management plan in part of the site. Whilst good practice measures to prevent the spread of non-native invasive species will be implemented during construction, it is not guaranteed that these measures would be successful at stopping the spread of these species within the site. INNS can be spread by other vectors, such as by birds, that are out with the Applicant's control. Measures proposed as part of the EIA Report to prevent the spread of INNS within the site would therefore need to be pragmatic and proportionate to the development.
45	Bats	The use of static detectors and walked transects are proposed to assess the level of bat activity at the site. It is recommended that any trees/structures affected by the works are assessed for their suitability to support bat roosts and further survey work carried out to confirm presence or absence of roosts. The results should inform the design. Where impacts are identified, mitigation/compensation measures should be applied. If the measures are not sufficient to avoid offences under protected species legislation, a licence will be required from NatureScot.	LLTNPA19	A15	A survey to assess bat activity within the site, has been undertaken and results of this assessment will be included in the 'Ecology' Chapter of the EIA Report.
46	Otter / Loch Lomond Woods SAC	A Habitats Regulation Appraisal screening will be required to identify the potential for likely significant effects on the otter qualifying interest of the Loch Lomond Woods SAC. It is recommended that a Species Protection Plan for otters is included in the EIA Report. This should detail the mitigation to avoid or minimise impacts on otters.	LLTNPA20	A15	A HRA has not been Produced for the Proposed Development. The SAC and qualifying interests will be discussed in the 'Ecology' Chapter including potential effects. A Species Protection Plan for otter will be included in the EIA report as a Technical Appendix.
47		We are content there will be no impact on the western acidic oak woodland qualifying interest of the SAC due to the separation distance between the site and SAC.	LLTNPA21	A15	Noted.

48		The application site lies within a predominately red squirrel area and any dreys should be assumed to be used by red squirrels unless survey work confirms otherwise.	LLTNPA22	A15	Noted.
49	Red Squirrel	Continued monitoring is proposed for red squirrel and should confirm if any of the dreys identified in the 2022 survey is used by red squirrel.	LLTNPA23	A16	Any red squirrels or dreys identified during the site walkover surveys will be reflected in the 'Ecology' Chapter of the EIA Report.
50		A Species Protection Plan for red squirrel is recommended to be included in the EIA Report.	LLTNPA24	A16	A Species Protection Plan for red squirrel will be included in the EIA Report as a Technical Appendix.
51	Badger / Pine Marten	Should further survey confirm the presence of badger, pine marten or other protected species, Species Protection Plans should be included in the EIA Report.	LLTNPA25	A16	Species Protection Plans for badger and pine martin will be included in the EIA Report as a Technical Appendix
52	Reptiles / Amphibians	Given the site contains suitable habitat, a Species Protection Plan for reptiles and amphibians is recommended to be included in the EIA Report.	LLTNPA26	A16	A Species Protection Plan for reptiles and amphibians will be included as a Technical Appendix in the EIA Report.
53	Fish	Support monitoring of populations of Powan over the summer of 2023 to conclude an assessment of the impacts on powan.	LLTNPA27	A16	Continued monitoring of powan populations translocated to refuge locations from Loch Sloy to locations within Argyll and Bute has been undertaken. Potential impacts on the Powan population will be included in the 'Aquatic Ecology' chapter of the EIA Report.
54		Given the status of the Loch Lomond and Sloy powan populations, it is recommended that the current status of the translocated powan populations is confirmed and detailed consideration of the impacts of powan and other fish species included in the EIA.	LLTNPA28	A16	Continued monitoring of powan populations translocated to refuge locations from Loch Sloy to locations within Argyll and Bute has been undertaken. Potential impacts on the Powan population will be included in the 'Aquatic Ecology' chapter of the EIA Report.
55	Birds	Welcomes commitment to undertake updated breeding bird surveys	LLTNPA29	A16	Results of the breeding bird surveys will be included in the 'Ornithology' Chapter and supporting appendices of the EIA Report.
56	LVIA	Content with LVIA methodology.	LLTNPA30	A17	Noted.

57	Study area	Consult with LLTNPA on the extent of the study area once the building height/mass, associated ancillary equipment and extent of woodland removal has been established and a ZTV has been produced.	LLTNPA31	A17	Further consultation with the LLTPNA regarding the study area has been undertaken and details will be included in the 'Landscape and Visual Impact Assessment' Chapter of the EIA Report.
58	Visual Impact Assessment	A ZTV should be produced representing the height of the proposed new buildings. The ZTV should illustrate the loss of tree cover to demonstrate maximum visibility / worst case.	LLTNPA32	A17	A ZTV based on the maximum building height and a worst-case bare ground model will be included in the 'Landscape and Visual' Chapter of the EIA Report. The bare ground model assumes open ground with no tree cover.
59		Retained woodland vegetation will reduce visibility from the loch edges / loch but ground truthing is required with seasonal change to leaf cover.	LLTNPA33	A17	Noted. This will be accounted for in LVIA.
60		Additional VPs will be required to provide a full representation of visual receptors.	LLTNPA34	A17	Consultation with LLTNPA has been undertaken in response to the request for additional viewpoints to be included from on Loch Lomond and from Inveruglas Isle. The inaccessibility of these locations and unsuitability of obtaining quality viewpoint photography from unstable ground (such as on a boat) has been communicated. It has been agreed that additional viewpoints from the opposite side of the Loch to Sloy at Inversnaid and from the Inveruglas Visitor Centre Terrace will be included. Photomontage visualisations for all agreed viewpoints will be included in the EIA Report to NatureScot standards. Furthermore, the LVIA will include consideration of all receptors within the study area with potential to be impacted and results of the assessment on these receptors will be included in the 'Landscape and Visual Impact Assessment' Chapter of the EIA Report.
61		The visual assessment is likely to require some high summit or path viewpoints to the east and west of the development. A water-based VP that represents the Inveruglas / Inversnaid ferry considered.	LLTNPA35	A17	
62		Consult with LLTNPA on viewpoint selection once the building height confirmed and ZTV produced.	LLTNPA36	A17	
63		Viewpoints for Sloy substation transformer replacement should assist and useful for cumulative visual assessment.	LLTNPA37	A17	
64		Photomontages should be provided for all viewpoints.	LLTNPA38	A17	
65	Landscape Impact Assessment	LLTNPA agree that the National Scale LCT are likely to be too broad scale and the use of LLTNP 2010 LCT could be considered with site visits and ref to NS LCT.	LLTNPA39	A17	The Applicant is in regular contact with SSEN who are responsible for the transformer development. SSEN will be informed of the data and methods

66		The PSH and replacement transformer developments should use a consistent approach to assessment to allow coherent analysis of change.	LLTNPA40	A17	used for the Landscape Assessment for the Sloy PSH project, with the view to promote consistency between projects.
67	SLQ's	The following SLQs should be added into the scope of assessment: * two lochs in one - The Highland Loch * Distinctive Mountain Groups / Ben Lomond * the easily accessible landscape splendour	LLTNPA41	A18	Potential impacts of the Proposed Development on the noted SLQs will be included in the 'Landscape and Visual Impact Assessment' Chapter of the EIA Report.
68		Working Draft 11 - Guidance for Assessing the Effects of Special Landscape Qualities (November 2018) is currently being updated. Contact NatureScot for most recent document.	LLTNPA42	A18	Noted.
69	Cumulative Assessment	The adjacent transformer replacement and associated tracks and UGL connection, A82 upgrade between Tarbet and Invernarnan, access tracks to facilitate undergrounding OHLs as part of the VISTA scheme, and the Cruach Tairbet access road, forest felling and restocking should be included in the cumulative assessment.	LLTNPA43	A19	Potential cumulative impacts will be included in the 'Landscape and Visual Impact Assessment' Chapter of the EIA Report.
70	Wild Land	Agree to scope out a WLA assessment. The LVIA and SLQ should be informed by WLA 7 description and LLTNPA Relative wildness study.	LLTNPA44	A19	Noted.
71		The viewpoint assessment is likely to include locations in WLA7 and LLTNPA core areas of wildness such as the WHW and summit views.	LLTNPA45	A19	The viewpoints agreed with LLTNPA are not within these areas.
72	Lighting	Lighting must be considered in temp works in the LVIA and SLQ assessment.	LLTNPA46	A19	Assessment of potential impacts of temporary lighting will be included in the 'Landscape and Visual Impact Assessment' Chapter of the EIA Report where appropriate.
73	Building Design	Mirroring key architectural features such as windows, scale of the lower south building and colours will establish a successful fit between the new and existing A Listed building.	LLTNPA47	A19	The Applicant has carried out consultations with LLTNPA and the appointed architect in order to achieve a building design which compliments the existing A Listed building.
74		Thought should be put into car parking and would be best to located behind the existing and new building.	LLTNPA48	A19	Parking will remain to the rear of the buildings.

75	Trees and Woodland	LLTNP Trees and Woodland Strategy should be referred to.	LLTNPA49	A19	Noted.
76	Excavated Material	Alternative location and repurposing solutions should be considered for the excavated material. If there is surplus there may be opportunities to use it in nearby developments such as the FLS forest road at Cruach Tairbeirt or the Sloy substation replacement.	LLTNPA50	A20	Plans for management of the excavated materials will be included in the EIA Report and will cover potential uses on nearby developments.
77	Temp Construction Compound and Vehicle Holding Area	These should be considered to minimise L+V impacts associated with them. Reinstatement should seek enhancement opportunities to leave landscape in improved state.	LLTNPA51	A20	A Landscape Mitigation Plan will be included in the EIA Report.
78	Traffic and Transport	Defer to Transport Scotland	LLTNPA52	A20	Noted. Transport Scotland have been consulted and consultation is ongoing.
79	Noise	Defer to Argyll and Bute Council EHT	LLTNPA53	A20	Noted.
80	Cultural Heritage	Defer to HES and WoSAS. Presence of cultural heritage assets in the vicinity is noted.	LLTNPA54	A20	Noted. The relevant legislation and guidance that has informed the scope of the cultural heritage assessment.
81	Land Use and Recreation	The Inveruglas core path is a popular route. No formal monitoring but anecdotal evidence there's 10-15,000 visitors / year, mainly at weekends. The EIA should assess impacts on the core path during construction, operation and decommissioning and mitigation is in place if required.	LLTNPA55	A20	Assessment of potential impacts on the Inveruglas Core Path will be included in the 'Recreation' Chapter of the EIA Report. Decommissioning of the scheme has been scoped out of the EIA.
82		The NPA has received no significant complaints received from people exercising their access rights on the core path in recent years despite regular operational use by SSE. The NPA hope this continues.	LLTNPA56	A20	Noted.
83	SoM	A summary schedule is welcomed.	LLTNPA57	A21	Noted. A Schedule of Mitigation will be included as an Appendix to the EIA Report.



84	Scope Out	LLTNPA agree for the following to be scoped out of the EIA: * Geology, Soils and Water * Air Quality * Forestry * Climate Change * Human Health * Major Accidents and Disasters * Socio-economic	LLTNPA58	A21	Noted.
85	Timeline	The EIA should set out an estimated construction timeline for the full duration of the works including restoration and removal of the construction site.	LLTNPA59	A21	An estimated construction timeline will be set out in the EIA Report.
86	Endrick Water SAC and salmon smolt migration	The Endrick Water is a SAC with brook and river lamprey and salmon, qualifying species for the designation status. MD-SEDD advise the developer to consider the salmon smolt migration from the Endrick Water via Loch Lomond to their marine feeding grounds (e.g. the pathways and timings of the smolt runs).	MS/MD01	A23	Potential impacts on fish of high conservation value will be included in the 'Aquatic Ecology' Chapter of the EIA Report.
87	Powan	Full details of fish surveys in all four waterbodies containing translocated Powan populations should be presented in the EIA and a review of the success or failure of these translocations included.	MS/MD02	A23	Surveys of translocated Powan populations within Argyll and Bute have been undertaken by and details will be included in the supporting appendices of the EIA Report.
88		NS and SEPA should be consulted regarding the potential to transfer ruffe into Loch Sloy and the interaction with the translocated powan populations.	MS/MD03	A23	The Applicant has consulted on the potential transfer of ruffe into Loch Sloy. Details will be included in the 'Aquatic Ecology' Chapter of the EIA Report.
89	Fish assessment	The potential impact associated with the construction and operation of the proposed development on all fish of high conservation value and which support important fisheries should be considered.	MS/MD04	A23	Potential impacts on fish of high conservation value will be included in the 'Aquatic Ecology' Chapter of the EIA Report.
90	Fish Baseline	Up to date information should be sought on the fish populations in Loch Lomond, in the vicinity of Inveruglas, and Loch Sloy which may be at risk of impact.	MS/MD05	A23	Loch Lomond Fisheries Trust and Loch Lomond Angling Improvement Association have been contacted. Potential impacts on fish of high

91		Data should be sought to inform the likely migration pathways of salmon smolts from the River Falloch and River Endrick and the risk of impingement and / or entrainment at the water intake in Loch Lomond is assessed.	MS/MD06	A23 / A24	conservation value will be included in the 'Aquatic Ecology' Chapter of the EIA Report.
92		Data should be sought from the Loch Lomond Fisheries Trust and Loch Lomond Angling Improvement Association for information on local fish stocks.	MS/MD07	A24	
93		If sufficient relevant and up to date data cannot be otherwise obtained, the developer should consider whether there is need to carry out survey work to obtain it.	MS/MD08	A24	
94	Fish Resilience	The resilience of fish populations to the potential impacts of the proposed development should be considered.	MS/MD09	A24	Potential impacts on fish populations will be included in the 'Aquatic Ecology' Chapter of the EIA Report.
95	Cumulative Fish Assessment	The potential cumulative impacts on fish populations as a result of the proposed project and other developments (existing and consented) e.g. the proposed replacement of transformers at Loch Sloy power station, Scottish Water abstractions in Loch Sloy and the abstraction at Ross Priory pumping station in Loch Lomond should also be considered.	MS/MD10	A24	Potential impacts on fish populations will be included in the 'Aquatic Ecology' Chapter of the EIA Report.
96	Fish Mitigation	Appropriate protective / mitigation measures, including the proposed spray reduction structure, diversion wall and settlement lagoon should be presented in the EIA.	MS/MD11	A24	Protective and mitigation measures for fish species will be set out in the 'Aquatic Ecology' Chapter of the EIA Report. All mitigation measures will also be listed in the Schedule of Mitigation.
97		All fish of conservation interest should be considered in the design of the screens and the approach velocity of water at the water intake in Loch Lomond and Loch Sloy.	MS/MD12	A24	Assessment of potential impacts on fish have been considered for the development of the design of the screens and approach velocity of water at the intakes of Loch Lomond and Loch Sloy. Further details will be included in the EIA Report.
98	Hydrological Modelling	MD-SEDD support the proposed hydrological modelling as a means of assessing the potential hydrological impacts throughout the development.	MS/MD13	A24	Noted.

99	Post-Commissioning Monitoring	MD-SEDD reiterate previous advice regarding the need for post commissioning monitoring, including the powan populations in Loch Sloy and the functioning of the screens, the approach velocities of water in front of the screen and the screen cleaning regime as a means of ensuring the system is operating as an appropriate protective measure for fish populations.	MS/MD14	A24	Details of post-construction monitoring for Powan is detailed in the 'Aquatic Ecology' Chapter. All mitigation measures will also be listed in the Schedule of Mitigation.
100	Railway	Details of proposed construction, including drainage and other engineering works in the vicinity of the railway line are to be included in the EIA, to ensure potential impacts of both the construction and completed development, on the current and future safe and efficient operation of the railway, are assessed.	NR01	A38	Contact has been made with Network Rail to discuss the proposals and consultation will be ongoing. Any aspects of the design that will impact on the railway will be agreed with Network Rail beforehand.
101	Drinking Water Catchment	The proposal falls within a drinking water catchment where a Scottish Water abstraction is located. This is defined as a DWPA. Loch Sloy supplies Belmore WTW and it is essential that water quality and water quantity are protected.	SW01	A41	Discussions with Scottish Water are ongoing to agree further survey methods including water sampling and process review to establish any potential effects on Belmore WTW and any mitigation measures that may be required to ensure that water quality and quantity in Loch Sloy are protected.
102	Meeting	A proposal to return 20m <sup>3</sup> /s for 6 hours seems quite high volume which may cause disturbance to the raw water quality and a meeting to discuss the application to better understand the proposal welcomed.	SW02	A42	Further consultation with Scottish Water is ongoing.
103	DWPA	Site specific risks and mitigation measures on DWPA will be required to be assessed and implemented. The fact that this area is located within a drinking water catchment should be noted in future documentation. Also, anyone working on site should be made aware of this during site inductions.	SW03	A42	Discussions with Scottish Water are ongoing to agree further survey methods including water sampling and process review to establish any potential effects on Belmore WTW and any mitigation measures that may be required to ensure that the DWPA is protected.
104	Excavated Material	Information on the quantities and type of material to be excavated included in the EIA and associated reuse strategy is provided.	SEPA01	A44	Information on the quantities and type of material to be excavated, as well as reuse strategy, will be included in the EIA Report.

105	CAR	Liaise with SEPA Water Permitting Team regarding regulatory requirements under CAR. Recommend the application and S36 applications are twin tracked. If not refer to 'Planning Guidance on Hydropower Developments' on information to be included.	SEPA02	A44	Noted. The SEPA Water Permitting Team has been contacted.
106	Scope	SEPA would welcome discussion around info requirements set out in their response as there may be opportunities to scope out some issues. Evidence must be provided in the submission to support why it is not an issue for this site.	SEPA03	A45	Noted.
107	Hydrological Modelling	Hydrological modelling should include full details of the model and method used for assessment. The modelling should show the development does not have an impact on water resource for both abstractions (public water supply from Loch Sloy and Loch Lomond). The proposed abstraction rate from Loch Lomond should be clearly stated.	SEPA04	A45	Details of the scheme hydrology will be included in the 'Description of Development' Chapter.
108	Wetland Birds	NatureScot and LLTNPA should be consulted on wetland breeding birds as the implications of quicker changes to loch levels may impact the whole loch area beyond the 5km site search.	SEPA05	A45	Assessment of potential impacts on bird species will be included in the 'Ornithology' Chapter of the EIA Report.
109	Design	Aspects of the design in relation to the abstraction regime and fish screening will be considered at the CAR stage.	SEPA06	A45	Noted.
110	Impacts to the water environment	Engineering activities in the water environment should be avoided wherever possible so the site layout should be designed to avoid such works or other direct impacts on water features.	SEPA07	A46	A buffer of 6m to watercourses and bodies has been included in the site design. This will be illustrated in the figures supporting the 'Soils, Geology and Water Environment' Chapter of the EIA Report. Required mitigation measures and best practice that would be adopted to protect soils, geology and the water environment will also be included in the Chapter. Best practice construction techniques for working in and around the water will be followed.
111		The submission must include a map showing all proposed temporary or permanent infrastructure overlain with all lochs and watercourses. Appropriate buffer zones, of minimum 6m from the top of the bank, should be included around any water features. If direct impacts are anticipated drawings should be provided showing what is proposed and measures proposed to protect downstream sensitive receptors.	SEPA08	A46	

112	Pollution prevention and Environmental Management	Noted a CEMP will be provided including details on pollution prevention and drainage management.	SEPA09	A46	
113		Recommend a schedule of mitigation supported by site specific plans referencing best practice pollution prevention construction techniques and regulatory requirements.	SEPA10	A46	A Schedule of Mitigation outlining all proposed mitigation measures will be included in the EIA Report. This will include pollution prevention measures.
114	Excavated Materials and Waste Management	The EIA should include an estimate of quantities and types of waste produced during construction and operation phases.	SEPA11	A46	The EIA Report will include estimates of the quantities and types of rock that will be extracted during the construction phase. No rock extraction is planned for the operational phases.
115		Include a description of the likely significant effects on the environment resulting from the disposal and recovery of waste.	SEPA12	A46	Assessment of the potential effects associated with the removal and/or storage of any excavated rock will be included in the EIA Report.
116		Set out the intended reuse strategy along with rationale / justification for reuse.	SEPA13	A46	The planned reuse strategy for the excavated rock will be set out in the EIA Report.
117		Recommend measures are taken through design to minimise quantities to be excavated as much as possible.	SEPA14	A46	Although a 'worst case' scenario for excavated materials will be presented in the EIA Report, the Developer is committed to achieving a 'best case' through the detailed design including a minimising the quantity of excavated rock as far as possible.
118		SEPA does not regulate the use of excavated materials on a development site, provided the use is necessary for the works, the material is suitable and does not require treatment and does not result in pollution. For further information refer to the land remediation and waste management guidance. It may apply to the reuse of rock spoil material resulting from pump excavations. Materials that do not meet the criteria in the guidance will need to be treated prior to reuse or removed from the site as waste. These activities will be regulated by SEPA under waste management controls.	SEPA15	A46 / A47	Noted.

119		Must consider the possibility of encountering contaminated materials arising from construction of the original hydropower infrastructure. A procedure and plan for any contaminated materials should be included in the EIA.	SEPA16	A47	There is no evidence in the borehole or trial pit records or site walkover surveys of potentially contaminated ground conditions. However, as there is potential for contaminated ground to be present, a soils and materials management plan would be included in the final CEMP to be agreed with A&BC.
120		Materials removed as part of the works including the existing spray reduction structure, rubble walling and woodland should be treated as waste. Waste must be classified, taken to a suitably permitted facility and accompanied by Duty of Care paperwork.	SEPA17	A47	Noted. Removal of the existing spray reduction structure no longer forms part of the Proposed Development. All best practice procedures will be followed in regard to managing waste.
121	Geology, Soils and Water	It is not clear what material will be excavated, where it will be stored and what impact it will have on the water environment. Request this topic is scoped in to the EIA to confirm there will be no detrimental impact on the water environment.	SEPA18	A47	Noted. 'Soils, Geology and Water Environment' has been scoped into the EIA and will form a Chapter of the EIA Report.
122	Geology, Soils and Water	It is recommended that a Geology, Soils and Water chapter is scoped in to the EIA Report.	SEPA19	A47	Noted. 'Soils, Geology and Water Environment' has been scoped into the EIA and will form a Chapter of the EIA Report.
123	Geology, Soils and Water	Recommend including the 2010 Jacobs Ground Investigation survey in the EIA.	SEPA20	A47	The 2010 Ground Investigation survey will be appended to the EIA Report and a summary of the confirmed ground conditions included in the 'Soils, Geology and Water Environment' Chapter.
124	PWS	A PWS assessment should be included in the Geology, Soils and Water EIA chapter.	SEPA21	A47	Assessment of the potential impacts of the Proposed Development on PWS will be included in the 'Soils, Geology and Water Environment' Chapter of the EIA Report.
125	Disruption to GWDTE and	The layout and design should avoid impacts on GWDTE.	SEPA22	A47	Assessment of potential GWDTEs areas will be included in the 'Soils, Geology and Water Environment' Chapter of the EIA Report.

126	groundwater abstractions	Further NVC survey on areas identified as potential GWDTE should be submitted, along with a map demonstrating all GWDTE and existing groundwater abstractions are outwith 100m of all excavations <1m deep and 250m for all excavations >1m deep. If the minimum buffer cannot be achieved, a detailed site specific qualitative and / or quantitative risk assessment will be required.	SEPA23	A47	Results of a targeted NVC survey and potential effects, including indirect effects, on potential GWDTE habitats, will be included in the 'Ecology' and 'Soils, Geology and Water Environment' Chapters of the EIA Report.
127	Aquatic INNS	Welcome intention to outline measures in the EIA to reduce risk of spread of Nuttall's Pondweed as far as practicable and a proposal to remedy any adverse effects.	SEPA24	A48	Noted.
128	Terrestrial INNS	The site is under management to eradicate INNS. An invasive management plan to specify eradication of nearby Japanese Knotweed and Rhododendron will be provided in the EIA.	SEPA25	A48	Noted.
129	Flood Risk	No concerns scoping out flood risk from the EIA but suggest the hydrological modelling be used to demonstrate the project will not increase flood risk to nearby receptors. If that's not the case then a Flood Risk Assessment should be submitted. Any crossings should be designed to accommodate 0.5% annual exceedance probability flows or information provided to justify smaller structures.	SEPA26	A48	A flood risk screening assessment is presented in the 'Soils, Geology and Water Environment' Chapter. Details of the scheme hydrology are included in the 'Description of Development Chapter.
130	Disturbance and reuse of excavated peat and other carbon rich soils	The EIA should be supported by information to demonstrate there is no peat on site. If proposals are on peatland or carbon rich soils, further information will be required to be submitted to address the requirements of Policy 5 of NPF4. If peat is identified, SEPA should be reconsulted.	SEPA27	A48	Potential impacts of the Proposed Development on Peat are included in the 'Soils, Geology and Water Environment' Chapter of the EIA Report
131	Trunk Road	Any proposed changes to the trunk road network must be discussed and approved by the appropriate Area Manager for the A82(T), Neil MacFarlane.	TS01	A50	Noted.
132	Access Junction	A layout drawing of the modified access junction be provided along with a Stage 1 Road Safety Audit. The plan should be submitted at 1:500 scale and be accompanied by visibility splay plans.	TS02	A50	Noted. Plans of the access junction and visibility splays will be included in the associated Appendices to the 'Traffic and Transport' Chapter of the EIA Report.

133	Accident Statistics	Rather than using Crashmap to obtain accident statistics, more up to date statistics can be obtained directly from Transport Scotland, contact <a href="mailto:accidentdatarequests@transport.gov.scot">accidentdatarequests@transport.gov.scot</a>	TS03	A51	Noted.
134	Traffic and Transport Assessment Methodology	Noted that the methodology is confused with the proposal to produce a Transport Assessment which would form an appendix to the EIA with an EIA chapter summarising the TA findings. Suggests the inclusion of the EIA Chapter covering access, traffic and transport would be a more simplified approach. The chapter would examine the potential environmental effects associated with increased traffic.	TS04	A50	A 'Traffic and Transport' Chapter assessing the potential environmental effects associated with increased traffic will be included in the EIA. This will be supported by a Transport Assessment included as an Appendix.
135	Abnormal Loads	TS will require to be satisfied that the size of any abnormal loads proposed can negotiate the selected route and that their transportation will not have a detrimental effect on structures within the trunk road route path.	TS05	A51	Details on any Abnormal Loads will be included in the 'Traffic and Transport' Chapter of the EIA Report.
136		If AIL envisaged a full Abnormal Loads Assessment report should be provided within the EIA that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to the street furniture or structures along the route.	TS06	A51	If required, an Abnormal Loads Assessment will be included in the EIA Report as an Appendix to the 'Traffic and Transport' Chapter.