

Balliemeanoch Pumped Storage Hydro

Pre-Application Consultation (PAC) Report

ILI (Borders PSH) Limited

July 2024

Quality information

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Revision History

Revision	Revision date	Details	Authorized	Name	Position
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Table of Contents

1. Introduction.....	4
Project Context.....	4
Purpose of this Report	5
Supporting Information.....	6
Content of the PAC Report.....	6
2. Approach to Pre-Application Consultation	7
Introduction	7
Proposal of Application Notice.....	8
Local Community Engagement.....	9
Public Exhibition Advertising.....	9
3. Assessment of Public Exhibition Feedback	11
Introduction	11
Overview of Public Exhibition Response.....	12
Engagement on Local Socio-Economic Benefits	13
South Loch Awe-side Community Company (SLACC) Annual General Meeting.....	14
4. Summary and Conclusions.....	14
5. References	15
Appendix A PAN.....	16
Appendix B Exhibition Boards	17

Figures

Figure 1.1 Location Plan	4
Figure 2.1 Balliemanoach PSH project website screenshot	10
Figure 2.2 Newspaper advert included in Oban Times.....	11
Figure 3.1 Photographs taken at Dalmally and Inveraray Public Consultation.....	12

1. Introduction

Project Context

- 1.1 AECOM is working on behalf of ILI (Borders PSH) Limited ('the Applicant') to assist with the development of the Balliemanoch Pumped Storage Hydro (PSH) scheme (hereafter referred to as 'the Development'). Upon operation, the Development will have an installed electrical generation capacity in excess of 50 megawatts (MW) and will contribute towards a flexible and resilient future energy network and power supply, which is a key Scottish Government goal.
- 1.2 A full description of the Development can be found in the Planning Statement submitted in support of this application under section 36 of the Electricity Act 1989 ("Section 36 Application"). This Pre-Application Consultation (PAC) report applies to all the works necessary to bring the PSH scheme into operation.
- 1.3 Figure 1.1 Location Plan, below, demonstrates the location of the Development in the context of the wider region. Given the extent of the area covered by the site (approximately 3,117 ha) there is no specific postal address for the proposal. As identified on the location plan below, the main site area for the Balliemanoch PSH scheme is located at national grid reference (NGR) NN 03615 17578, approximately 4.4 kilometres (km) to the south of the village of Portsonachan and 9 km northwest of Inveraray (hereafter referred to as the 'Development Site'). The Development Site falls within the Argyll and Bute Council (ABC) local authority area.
- 1.4 In addition to the main Development Site, two smaller site areas lie to the north and south of Inveraray. These areas comprise Access Tracks which will be developed and upgraded to provide safe and efficient access for plant and materials to the primary Development Site.

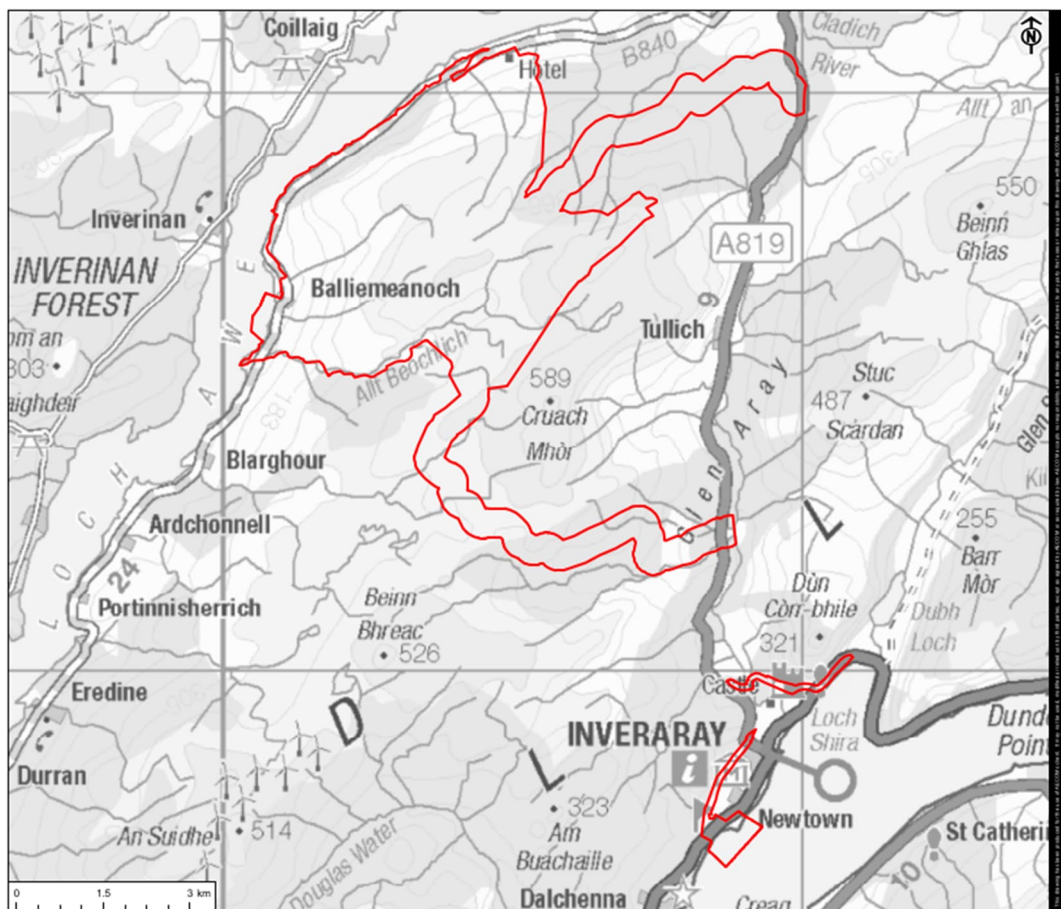


Figure 1.1 Location Plan

- 1.5 PSH is a mature energy storage technology that was first installed towards the end of the 19th century and is now the most developed large-scale energy storage technology currently available. It is considered to have low levels of technological risk compared to other energy storage technologies and can react almost immediately to demands for electricity. Although not a renewable energy technology itself, PSH can complement renewables and reduce potential issues with variability caused by a network with reliance on renewables. This technology therefore permits greater penetration of intermittent renewables.
- 1.6 The PSH scheme will have a storage capacity of approximately 45,000 gigawatt (GW) hours with approximately 1,500 MW installed electrical generation capacity. The Development comprises the following component parts (further details can be found within the EIAR Volume 2 Main Report, Chapter 2: Project and Site Description):

Above ground components:

- Headpond (comprises the upper waterbody; two Embankments retaining the water in the Headpond; and the inlet / outlet structure where the Waterways exit the Headpond, the structure will predominantly sit within the main Embankment);
- Tailpond (comprises the lower waterbody (i.e. a small area of Loch Awe), with a partially submerged inlet / outlet structure where the Waterways enter the Loch; a temporary cofferdam that will encircle the required Tailpond area and be pumped dry during construction of the inlet / outlet structure);
- Temporary Marine Facility on Loch Fyne for the delivery of a small number of abnormal loads during construction;
- Temporary realignment of a short section of the B840 during construction to allow for the construction of the inlet / outlet. The B840 will be reopened post construction to its current alignment;
- Eleven temporary compounds and eleven permanent compounds (for equipment and material storage, switching station, tunnel access, a site office, and welfare facilities);
- The switching station will consist of two secure electrical compounds, in which electrical equipment will be housed. In addition to the external switchgear, a number of parking spaces and permanent welfare facilities will be present;
- Newly formed access to the Development Site from the public transport network; and
- Access Tracks (both temporary and permanent for movement around the Development Site).

Below ground components:

- Waterways (a closed loop system for water transfer (consisting of a high-pressure tunnel to the power cavern and a low-pressure tunnel between the power cavern and Tailpond inlet / outlet structure), a spillway for draining excess water from the Headpond, also containing a scour pipe for scouring and draining in an emergency, and surge shafts as in-built safety features);
- Power cavern, incorporating the powerhouse (containing reversible pump turbines) and transformer gallery (containing the transformers); and
- Tunnels including a construction and emergency egress tunnel, access tunnel, power cable tunnel and a ventilation tunnel.

- 1.7 Due to its scale and proposed generation capacity, which is greater than 20MW, the Development would be considered 'Major' in nature, as defined in the Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009, Schedule 2(8). However, we also note that the 2009 Regulations do not apply to the Development since consent can only be granted for a development of this scale under the Act.

Purpose of this Report

- 1.8 As set out in the accompanying Planning Statement, the Section 36 Application for the Development will be submitted to the Energy Consents Unit and made under the Act. Deemed planning consent will also be sought, and the application will, therefore, follow the requirements of the Town and Country Planning (Scotland) Act 1997.
- 1.9 The Town and Country (Scotland) Act 1997 (as amended by the Planning etc. (Scotland) Act 2006) and the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 set out

the requirements for statutory pre-application consultation on developments related to both national and major developments. Regulation 7 of the 2013 Regulations states that at a minimum, the applicant must consult every community council where any part of their area is within or adjoins the land on which the Development is situated and must also hold two public events where members of the public can make comments to the prospective applicant on the proposals. Details of the relevant community councils contacted as part of the PAC process has been included in Paragraph 2.2.

- 1.10 Guidance on PAC is further described in the Scottish Government's Planning Circular 3/2022 Development Management Procedures, where the rationale for statutory requirements includes "...*publicity and consultation to make communities aware of, and have an opportunity to comment on, certain types of development proposals (namely major and national developments) before they are finalised and a planning application has been made. The planning applications in such cases must include a report on the pre-application consultation between applicants and communities*" (Paragraph 2.1).
- 1.11 This PAC Report therefore provides an account of the pre-application consultation that has been undertaken by the Applicant in advance of submitting the Section 36 Application to the ECU.

Supporting Information

- 1.12 This PAC Report should be read in conjunction with the wider planning application package which includes the following:
- Planning Statement
 - Environment Impact Assessment Report Volumes 1-6:
 - Volume 1 Non-Technical Summary
 - Volume 2 Main Report
 - Volume 3 Figures
 - Volume 4 Visualisations
 - Volume 5 Appendices
 - Volume 6 Confidential Appendix (not publicly available)

Content of the PAC Report

- 1.13 While the legislation governing pre-application consultation does not specify the content of the PAC Report beyond setting out what has been done to effect compliance, the Scottish Government's Planning Circular for Development Management Procedures (Planning Circular 3/2022) provides an outline approach to undertaking PAC.
- 1.14 In line with guidance prescribed in these guidance documents, the following information is included in this report:
- Background on the consultation carried out;
 - Details on compliance with statutory consenting requirements;
 - A list of consultees and stakeholders invited to engage in the pre-application process;
 - Details of the public exhibitions held;
 - A summary of responses and comments received;
 - Evidence that the prescribed steps above have been undertaken; and
 - Demonstration that steps were taken to explain the nature of PAC, in particular that it does not replace the application process whereby representations can be made on the Section 36 Application after submission.

2. Approach to Pre-Application Consultation

Introduction

2.1 As the design of the Development has progressed, consultation has been undertaken with a range of interested parties including statutory and non-statutory consultees, stakeholders and the local community. The following section of this PAC Report provides an overview of the consultation which has been carried out prior to the submission of the Section 36 Application in order to inform key stakeholders, consider representations and comments received and develop the preferred option for implementation. Feedback from the two in-person public exhibition events is specifically addressed in Section 3.

2.2 As per the Proposal of Application Notice requirements (see Appendix A for details), the Applicant has liaised with the following community councils during the PAC process:

- Inveraray Community Council
- Glenorchy & Innishail Community Council
- Avich & Kilchrenan Community Council
- Furnace Community Council
- Dunadd Community Council
- West Loch Fyne Community Council
- Taynuilt Community Council

2.3 The Applicant has also undertaken several meetings with statutory consultees, both prior to submission of the Scoping Report, and following receipt of the Scoping Opinion. Statutory consultees contacted include:

- | | | |
|---|---|--|
| • Argyll & Bute Council | • Highland and Islands Airports | • Nuclear Safety Directorate (HSE) |
| • BAA Aerodrome Safeguarding (Aberdeen) | • Historic Environment Scotland | • RSPB Scotland |
| • British Horse Society Scotland | • Internal Scottish Government Advisors | • Scottish Forestry |
| • BT | • Joint Radio Company | • Scottish Rights of Way and Access Society (ScotWays) |
| • Civil Aviation Authority | • John Muir Trust | • Scottish Water |
| • Crown Estate Scotland | • Marine Scotland | • Scottish Wildlife Trust |
| • Defence Infrastructure Organisation | • Maritime and Coastguard Agency | • Scottish Wild Land Group (SWLG) |
| • Edinburgh Airport | • Mountaineering Scotland | • SEPA |
| • Fisheries Management Scotland | • MS-LOT | • Tay Rivers District Salmon Fisheries Board |
| • Fisheries Trust Scotland – Argyll | • National Grid | • Transport Scotland |
| • Glasgow Airport | • NATS Safeguarding | • VisitScotland |
| • Glasgow Prestwick Airport | • NatureScot | • West of Scotland Archaeology Service |
| | • Network Rail | • Woodland Trust |

2.4 In addition to meetings held with the aforementioned statutory consultees, the Applicant has engaged in consultation and liaison with multiple non-statutory consultees, including:

- Loch Awe Boats Activity Centre
- Portsonachan Hotel & Lodges
- Ardbrecknish House Restaurant and Bar
- Cladich House Bed & Breakfast
- Braevallich Fish Farm Dawnfresh Seafoods Ltd.
- Trevine Farm Dawnfresh Seafoods Ltd.
- Clyde Marine Planning Partnership
- MoD/QinetiQ
- MOWI
- ClydePort (Peel Ports)
- MCA
- NLB
- Clyde Fishermen's Association
- Scallop Association
- Communities Inshore Fisheries Alliance
- UKHO
- Scottish Fishermen's Federation
- Scottish Fishermen's Organisation
- Scottish Water
- Argyll Fisheries Trust
- Clyde Salmon
- West Coast Regional Inshore Fisheries Group
- Scottish Creel Fishermen's Federation
- RYA
- Whale and Dolphin Conservation
- Fisheries Office
- UK Chamber of Shipping
- Marine Safety Forum
- Fisheries Management Scotland

Proposal of Application Notice

2.5 Where PAC is required, Section 35B of the Town and Country Planning (Scotland) Act 1997 (as amended) and Regulations 4 and 5 of the Town and Country Planning (Development Management Procedures) (Scotland) Regulations 2013 (as amended) require prospective applicants to notify the planning authority of forthcoming planning applications with a Proposal of Application Notice (PAN).

2.6 Paragraph 2.22 of the Planning Circular 3/2022 provides further detailed guidance and specifies that the applicant must provide a PAN to the planning authority “at least 12 weeks prior to the submission of a planning application including the following information:

- i. A description in general terms of the development to be carried out;
- ii. The postal address of the development site, if it has one;
- iii. A plan showing the outline of the site at which the development is to be carried out and sufficient to identify the site;
- iv. Detail as to how the prospective applicant may be contacted and corresponded with; and
- v. An account of what consultation the prospective applicant proposes to undertake, when such consultation is to take place, with whom and what form it will take. This should include steps in addition to the statutory minimum for consultation.”

2.7 A PAN setting out the proposed approach to consultation and including a plan showing the location of the Development, was submitted to Argyll and Bute Council on 29th June 2023 (see Appendix A). It was agreed through the PAN process that a public exhibition would be held at Inveraray Inn on 19th July 2023. A second event was also held on 7th August 2023 at Dalmally Community Hall. Additionally, members of the project team attended the South Loch Awe-side Community Company (SLACC) Annual General Meeting (AGM) on 26th October 2023 in Portsonachan Village Hall. Greater detail on public consultation and engagement undertaken has been set out in Section 3 below.

2.8 Argyll and Bute Council responded on 30th June 2023, stating that a PAC Report would be required to accompany the ultimate Section 36 Application; however, they did not request that any supplementary information be included in addition to that set out within the PAN.

Local Community Engagement

2.9 The Applicant engaged with the local community and community councils from an early stage in the design development process. An online community council meeting was held on 13th September 2021. An introductory presentation was provided by the Applicant, introducing members of the Applicant team and the project team from AECOM.

2.10 Representatives of the following community councils and local stakeholders were invited to view indicative proposals and drawings of the Development and talk to members of the Applicant and project team:

- Inveraray Community Council
- Glenorchy & Innishail Community Council
- Avich & Kilchrenan Community Council
- Furnace Community Council
- Dunadd Community Council
- West Loch Fyne Community Council
- Taynuilt Community Council
- Argyll Estates
- Balliemanoch Farm
- Cladich Farm
- Three Bridges landowner
- Upper Sonnachan, Keppochan & Cladich landowner
- Blarghour landowner

2.11 Following this introductory meeting, a project website was created: <https://www.balliemanochpsh.co.uk>

Public Exhibition Advertising

2.12 The public exhibition events were publicised in: The Campbeltown Courier, Argyllshire Advertiser, The Oban Times, Lochaber Times, and Dunoon Observer, in line with guidance in paragraphs 2.19 and 2.20 Development Management Circular 3/2022. The newspaper advertisement appeared in issues for a total of five weeks prior to the public exhibitions. Figure 2.2 presents a copy of the advert and demonstrates compliance with regulatory requirements.

Balliemanoach Pump Storage Hydro Scheme

▼

Upcoming Public Events:

- The Inverary Inn, 19th July, 3-8pm
- Dalmally Community Hall, 7th August, 3-8pm

[Click here to view our Virtual Exhibition Room >](#)

Why Pump Storage

The amount of electricity generated from renewables in the UK has increased 3-fold over the last decade. Due to its intermittent nature, the rise in renewable generation has resulted in increased demand for flexible capacity to help meet energy balancing requirements for the national grid system.

Pumped storage hydro is considered by the Directors to be the most developed and largest capacity form of grid energy storage that currently exists. This can help reduce renewable energy curtailment and therefore promote grid stability.

Principles of a pumped storage power plant

PSH Technology

Pumped storage is a way of storing energy by turning electrical energy into stored (or potential) energy and back again to electrical energy. The system uses electricity to pump water from a lower reservoir to a higher reservoir. This pumping happens at times when there is more energy being produced on the grid network than is needed. This energy is stored until it is required, when the water is allowed to flow back through a hydro-turbine, generating electricity to meet sudden or predicted spikes in consumer demand.

This cycle of pumping and generating repeats on a daily basis as required. Pumped storage utilises excess generated electricity when consumer demand is low and generates electricity when demand requires. It can be used at very short notice to provide what the Directors consider to be a flexible and valuable balancing service to the relevant distribution network operator.

A typical conventional pumped storage hydro power plant consists of four components:

1. Water reservoirs: normally two interconnected water reservoirs.
2. Water piping: tunnels that allow moving water from one reservoir to another.
3. Powerhouse: facility with one or more pump/turbine and motor/generator assemblies that allow pumping water into the upper reservoir at off-peak hours, and discharging water into the lower reservoir.
4. Grid connection: power transmission lines to move the generated power from the plant into the grid.

Components are often housed underground.

Figure 2.1 Balliemanoach PSH project website screenshot

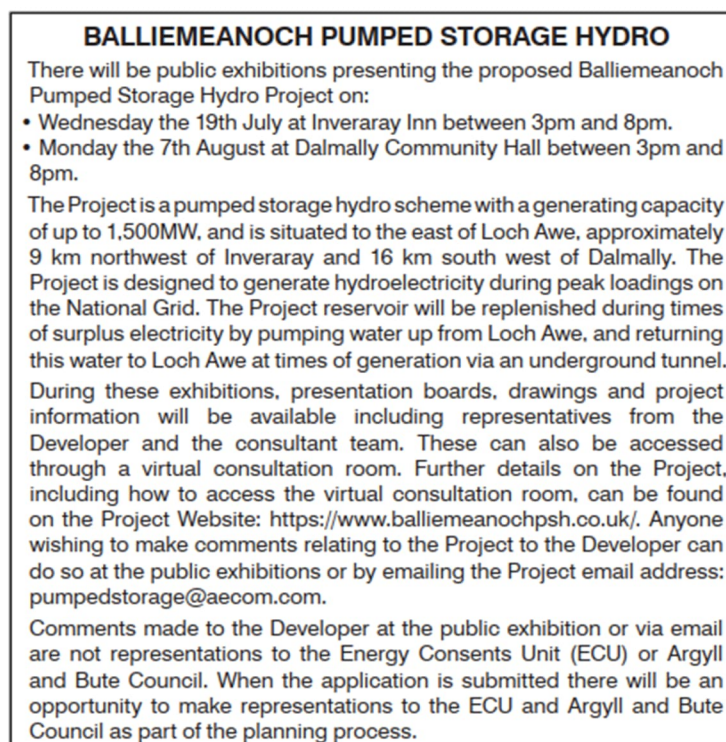


Figure 2.2 Newspaper advert included in Oban Times

- 2.13 Following feedback received during another of the Applicant's PSH schemes (Red John near Inverness) that had been recently granted Section 36 Consent, in addition to the newspaper advertisements, the Applicant provided additional notification by means of a letter drop sent out to every residential and business address within the PA32 and PA33 postcode area.
- 2.14 The community councils contacted during the PAN process described in paragraph 2.10 above were directly invited to the public exhibition events.

3. Assessment of Public Exhibition Feedback

Introduction

- 3.1 Two in-person public exhibition events took place at Inveraray and Dalmally in summer 2023. The first event was held on 19th July 2023, between 15:00 and 20:00 at Inveraray Inn. The second public exhibition event occurred on 7th August 2023, between 15:00 and 20:00 at Dalmally Community Hall. The scheduling of these events was considered appropriate to allow all potential stakeholders an adequate opportunity to attend.
- 3.2 The exhibitions were also planned to occur at a specific point in the project whereby the design of the Development was established enough to provide a sufficient impression of the project and the potential effects, whilst allowing opportunities for design amendments in response to feedback. This ensured that real value was placed on the feedback received at the exhibition events.
- 3.3 Representatives from both the Applicant and AECOM project teams were present at both events. Together these individuals were able to address all technical queries.
- 3.4 Approximately 76 people attended the two exhibitions over the two days. It should also be noted that an additional circa 20 people attended the South Loch Awe-side Community Company AGM presentation on the 26th October as discussed at paragraph 3.14 below.
- 3.5 A series of exhibition boards were prepared and are shown in Appendix B. In addition to the feedback forms provided, questionnaires were made available at the exhibition events and on the project website. Two

questionnaires were available and these were intended to gain further insight into recreational uses in the area, and local residents' private water supply. In total, five questionnaires were partially completed either in-person at the public exhibitions, returned later by post or filled in online via the project website. Six additional email responses with queries were received. A brief summary of the public queries emailed and questionnaire responses received has been included in paragraph 3.12 below.

3.6 Following the consultation events, the exhibition material was posted on the project webpage allowing further opportunity for stakeholders to review and comment on the proposal. The webpage highlighted where comments should be directed and re-iterated that these were not representations to the Planning Authority or the Energy Consents Unit but rather would inform the design of the Development.

Overview of Public Exhibition Response

3.7 Approximately 76 individuals attended the exhibition events. The majority of attendees were local residents. Figure 3.1 presents a selection of photographs taken at both exhibition events.



Figure 3.1 Photographs taken at Dalmally and Inveraray Public Consultation

3.8 Features of the Development and its evolution were explained and supported by a comprehensive suite of illustrative drawings. It was made clear to all attendees that the proposal may be subject to change or be amended prior to the submission of the Section 36 Application, and request for deemed planning permission.

3.9 It was also made clear in the supporting information that comments provided at this stage would not be considered as formal representations to the Section 36 Application and that there would be further opportunity to make comments to Argyll and Bute Council and the Energy Consents Unit on the Development after submission of the Section 36 Application.

3.10 A number of key themes arose from the public consultation events, including:

- General Interest
- Proposed jetty at the Marine Facility
- Roads and Transportation
- Grid Connection and Overhead Lines
- Workers' Accommodation and Traffic
- Ecology

- Private Water Supplies
 - Landscape and Visual
 - Community Benefit
 - Recreational Loch Users
 - Flood Risk/Low Water Levels
 - Noise
- 3.11 The questionnaire responses indicate that the local area is used regularly for walking. Whilst certain responses were supportive of the proposal, a general concern over the potential impact of the Development upon local walking routes and access along the A85 and B840 arose. The private water supply questionnaire responses indicated that the majority of properties have a private water supply, supplied from a watercourse with no mains supply. Water is used predominantly for drinking, food preparation and washing.
- 3.12 Concerns raised within the email responses include:
- Changes to Loch Awe water levels;
 - Increased traffic flows at a specific residential receptor on the A819; and
 - The potential for negative economic and wellbeing impacts to emerge for an individual at South Cromalt, as a result of the Development.
- 3.13 As detailed within the EIAR Volume 2 Main Report, Chapter 3: Evolution of Design and Alternatives, feedback received from the exhibition events informed the Development design evolution with Design IV prepared following comments and feedback received from the local community and landowners.
- 3.14 As previously discussed, the Scottish Government's Planning Circular for Development Management Procedures (Planning Circular 3/2022) provides an outline approach to undertaking PAC. As part of this, it is advised that the PAC should include details on the extent to which the design of the Development has changed as a result of the PAC. In this regard, the following key outcomes from the public exhibition have been taken forward as the design has progressed:
- Visual impact of the jetty was noted as a concern for some local residents. The layout of the jetty was therefore designed to reduce visual effects on nearby residential properties. In addition, it was determined that the jetty would be a temporary installation that will be removed upon completion of the Development's construction, in order to reduce effects on nearby residential properties;
 - The overall effect of the Development upon nearby residential properties was a key topic amongst attendees. The location, layout and use purpose of the construction compound near the Marine Facility were therefore changed to reduce effects on nearby properties; and
 - The potential opportunities for community benefits associated with the Development to be explored was a key outcome from the PAC. These are discussed below.

Engagement on Local Socio-Economic Benefits

- 3.15 The finalised design includes detail on how the proposed new and upgraded Access Tracks could be utilised by recreational users. In addition, benches, information signage (on the PSH and walking / cycling routes available through the site), warning signage (at the Headpond and inlet / outlet) and directional signage will be installed to enhance the visitor experience during operation and ensure visitor safety. The Applicant has invited the community to approach them via the project website feedback form <https://www.balliemanochpsh.co.uk/> or email address pumpedstorage@aecom.com and would be happy to discuss how they can contribute towards a community driven project.
- 3.16 Early engagement with Inspire Inveraray helped identify concerns relating to the proposed jetty and allowed these issues to be addressed in subsequent design stages. Through communication with the local community, the potential implications of the post-construction retention of the jetty upon the community's plans to reinstate the historic pier were outlined. The request to remove the jetty during operation of the Development was echoed by a resident living adjacent to the site. Whilst piles must remain in place to facilitate the replacement of any large components of the PSH scheme and to avoid the need to repeatedly rebuild and remove the jetty, the Applicant agreed to remove the deck following construction. This will avoid the Development's jetty competing with the historic pier.
- 3.17 The applicant has engaged with Argyll Estate in relation to the construction of 12 permanent homes to be located on a site within the Estate that is allocated for residential use within the Local Development Plan. The houses will be used for senior management workers at the construction stage, with three retained for permanent workers at the operational stage. The remaining nine will be retained by Argyll Estate with a view

to being made available to Estate employees or to local workers in industries such as care, catering, tourism, etc. Further details are included in the draft Workers Housing Strategy.

3.18 Engagement with Glenorchy & Innishail Community Council involved discussion on the potential locations for workers housing in proximity to the Development. This identified that:

- Residents in smaller settlements may be receptive to accommodating workers housing, subject to the management of impacts and good community consultation.
- Residents would welcome the benefits from the temporary population, e.g. workers spending money in local businesses, but would also want to see a legacy post-construction, such as longer-term housing for the community or key workers (e.g. a locum pharmacist).

3.19 This feedback has been considered as part of the draft Workers Housing Strategy.

South Loch Awe-side Community Company (SLACC) Annual General Meeting

3.20 Additionally, the Applicant, accompanied by the lead designer from AECOM, were invited to attend the South Loch Awe-side Community Company (SLACC) Annual General Meeting (AGM) on 26th October 2023 in Portsonachan Village Hall, and give a presentation on the Development, similar to that provided at the public exhibitions. Approximately 20 people attended this event which was advertised by the SLACC.

3.21 There was a general level of interest in the Development amongst those attending, with the impact of the Development upon the water levels of Loch Awe representing a key issue raised. As part of the general SLACC AGM, an earlier item on the agenda included Portsonachan Village Hall and how plans to extend and renovate the hall were in jeopardy because of existing flood risk. As such, the community wanted to understand the effect on water levels when the Development is pumping or generating. Additional queries relating to the noise impacts of the Development were also raised.

4. Summary and Conclusions

4.1 From project inception, partnership working and stakeholder engagement has been given high priority in order to adequately identify, and where possible address, any concerns associated with the Development. This report demonstrates that throughout the design process, significant emphasis has been placed on ensuring all relevant stakeholders are adequately informed of the project's progress and have had sufficient opportunity to fully comment on and inform the finalised development design.

4.2 The public exhibition provided the local community and wider stakeholders with the opportunity to learn about the benefits of the Development and the design ethos proposed. An open forum was provided for stakeholders to raise suggestions, concerns or issues.

4.3 In terms of the design process, the opportunity to engage with the local community also provided valuable feedback which informed the layout of the jetty – as explained above, the jetty will now be a temporary structure and the location of the construction compounds. Community feedback also informed the community of the benefits of the scheme, including recreational use of Access Tracks and the installation of benches and signage to enhance safety and the visitor experience.

4.4 In light of the above, it is clear that the Applicant has fully complied with the pre-application consultation legislative requirements. However, it is anticipated that discussions will continue with Argyll and Bute Council and local stakeholders through the consenting process.

5. References

The Town and Country Planning (Scotland) Act 1997

The Planning etc. (Scotland) Act 2006

The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009

The Town and Country Planning (Development management Procedures) (Scotland) Regulations 2013

Planning Circular 3/2022: 'Development Management Procedures' (Scottish Government, 2022)

Appendix A PAN

Form provided by



This form should be used by prospective applicants to serve notice to both the Planning Authority and other relevant persons/community groups/agencies that 'PAC' is to be undertaken in respect of a prospective planning application.

For Official Use Only
Date Received:
Ref:

Pre-Application Consultation ('PAC') - Proposal of Application Notice

Requisite Notice under Section 35B(2) & (5) of the Town and Country Planning (Scotland) Act 1997

TAKE NOTICE:

1) That pre-application consultation is to be undertaken by: (insert name and contact details of prospective applicant - see note 1)

Name: Ross McLaughlin
Address: Intelligent Land Investments, The Shires, 33 Bothwell Rd, Hamilton, ML3 OAS Telephone: 01698 891 352
E-mail: rm@ili-energy.com

2) represented in this matter by: (if applicable, insert name and contact details of agent - see note 2)

Name: Victoria Deacon
Address: AECOM, 1 Tanfield, Edinburgh, EH3 5DA
Telephone: 0131 301 8600 E-mail: pumpedstorage@aecom.com

3) for a prospective planning application for: (insert general description of development - see note 3)

The applicant proposes to construct a pumped storage hydro scheme (PSH) on land situated to the east of Loch Awe, approximately 9km north west of Inveraray and 16km south west of Dalmally. Balliemeanoch PSH will have a storage capacity of approximately 45,000 gigawatt hours (GWh) with approximately 1,500 MW installed electrical generation capacity (subject to further investigation and feasibility works).

The total area within the red line boundary is approximately 3,100 hectares (ha). Not all of this area within the boundary will be developed. The development will comprise a Headpond with two embankments. The maximum embankment height is 95 m high above existing ground level (425 m AOD (426.5 m including 1.5m fencing)). Tailpond location within Loch Awe at circa NN 00961 16361. There will also be upgrades to existing tracks, and new tracks.

In order to facilitate delivery of large machinery to site, a loch structures will also be required the the south of Inveraray circa NN 08570 07162

Development is a s36 application, scoping undertaken, reference ECU00003444

4) at: (insert address of prospective development - see note 4)

Land to the east of Balliemeanoch, near Dalmally, PA33 1BW

as identified on the accompanying scale location plan. (see note 5)

SUBMISSION OF COMMENTS TO PRE-APPLICATION CONSULTATION:

- 5) **If you wish to make comments about the prospective development these should be submitted to the prospective applicant at:** (insert postal/e-mail address/telephone to which consultation comments should be submitted to the prospective applicant or their representative in this matter – see note 6):

Name: Victoria Deacon

Address: AECOM, 1 Tanfield, Edinburgh, EH3 5DA.....

Telephone: 0131 301 8600..... E-mail: pumped.storage@aecom.com.....

- 6) **no later than:** (insert closing date for receipt of comments to ‘PAC’ – see note 7)

Friday 18th August 2023.....

Note: PAC is undertaken by prospective applicants in advance of the submission of a formal planning application to Argyll and Bute Council. Comments in respect of a PAC exercise must be submitted to the PROSPECTIVE APPLICANT and should not be submitted to the planning authority at this time. Any correspondence received by Argyll and Bute Council’s Planning Services in respect of a PAC exercise will be returned to the sender. Comments submitted to a prospective applicant at this time are not representations to the Planning Authority; in the event that the prospective applicant submits an application for planning permission then there would be an opportunity to make representations on that application following its submission to the Planning Authority.

SUMMARY OF PRE-APPLICATION CONSULTATION TO BE UNDERTAKEN BY THE PROSPECTIVE APPLICANT:

- 7) **Having regard to the requirements of Section 35B(2) of the Act, this notice has been served upon Argyll and Bute Council, Development Management, Major Applications Team, 1A Manse Brae, Lochgilphead, Argyll, PA31 8RD on:** (enter date notice served upon planning authority – see note 8)

Wednesday 21st June 2023

from which a minimum of 12 weeks must elapse prior to the submission of a formal application for planning permission.

- 8) **Those notified in terms of Regulation 7(1) of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 are:** (insert details of relevant Community Council consultation – see note 9 – continue on a separate sheet if necessary)

Community Council	Address	Date Notified
	glenorchyb8074@gmail.com	
Glenorchy & Innishail	caroline.sharp07@gmail.com richard.field@orrani.com	21st June 2023
Inveraray	inveraray@btinternet.com	21st June 2023

11) **the full details of which shall be published a minimum of 7 days in advance in:**
(insert name of publication local to development site/location of public event(s) – see note 12)

Publication	Date Published
Argyllshire Advertiser	publication within w/c 03-07-2023 for 5 weeks
Argyll Bute 24	publication within w/c 03-07-2023 for 5 weeks
Oban Times	publication within w/c 03-07-2023 for 5 weeks

12) **In addition to the above it is also proposed to undertake the following additional forms and types of consultations:** (insert details of who is to be consulted, form of consultation, date and time consultation will be undertaken – continue on another sheet if necessary - see note 13)

Both public in-person events listed within Section 10 above will commence with a brief presentation, followed by QA session. Roller boards presenting information on the proposals will be situated in the venue, with both members of the client and consultant teams present to aid members of the public. Questionnaires and feedback forms will also be available. It is currently estimated the events would run from 3pm-8pm, on both occasions.

The applicant has set up a project specific website with feedback forms: <http://www.bal-liemeanochpsh.co.uk/>

Intelligent Land Investments will undertake a mail drop containing information on the proposed development and public events to all landowners involved and properties within the relevant PA32 and PA33 postcode areas.

13) DECLARATION

I hereby certify that I, the prospective applicant/agent, have given correct and complete information and given the requisite notice to all parties listed above in respect of the requirements of S35B of the Act.

SIGNATURE OF PROSPECTIVE APPLICANT/AGENT: 

PRINT NAME: Victoria Deacon

DATED: 21-06-2023

Guidance Notes for the Prospective Applicant/Agent:

1. Prospective Applicant: The applicant name as stated on the 'Proposal of Application Notice' must be the same as that which will be stated on any subsequent formal application for planning permission.
2. Agent: If an agent is being used (e.g. a Solicitor or an Architect) all correspondence regarding the submission will be sent to the agent by the Council.
3. Description of the proposed development: Sufficient detail should be provided to enable the Planning Authority to determine the class of the development in respect of the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009. Such details should also include the proposed use(s) which will comprise, and the scale of the development, e.g. number of residential units proposed; the range or maximum gross floor area of buildings expressed in square metres; the capacity of the facility; and the length of infrastructure projects.
4. Address of the prospective development site: Where available, this should be the full postal address, including postcode; where this is unavailable then a descriptive site address should be provided.
5. The Proposal of Application Notice requires to be accompanied by an OS base plan scaled 1:10000/1:2500/1:1250 (as appropriate to show the site within its locality) identifying the outline of the site at which the development is to be carried out.
6. Contact details for submission of comments to the prospective applicant: the regulations do not prescribe the form which comments must be submitted to 'PAC'; however in completing this notice prospective applicants are advised that the arrangements provided for the submission of comments should be inclusive rather than exclusive of any section of the community. It is also advised that where possible the submission of written/e-mail comments is encouraged as this will not only be of assistance in providing evidence that 'PAC' has been undertaken, but will also restrict the scope for any unintentional misinterpretation of comments.
7. Closing date for submission of 'PAC' comments: The regulations do not prescribe the minimum period which should be allowed from service of the proposal of application notice for submission of comments. Prospective applicants are advised that consultees and the community should be afforded a reasonable time period for the submission of comments to 'PAC', in this respect Argyll and Bute Council would suggest that such a period comprises a minimum of 21 days following the holding of a public event.
8. Date notification served upon the Planning Authority: This is the date that the proposal of application notice is issued to the Planning Authority; the provisions of Section 35B(3) of the Act specify that a minimum period of 12 weeks must elapse between this date and a formal planning application for the development being submitted.
9. Community Councils: The provisions of Regulation 7(1) require the proposal of application notice to be served upon the community council(s) within whose area the proposed development is situated or, which adjoin the development site.

10. Additional Notifications: Prospective applicants should have a meaningful, proportionate engagement with those who can represent communities' views, in order to achieve this they should also seek to identify and serve the proposal of application notice upon other persons, community groups/stakeholders who may be affected by the proposed development – further guidance in this respect is provided in the PAC Process Pack produced by Argyll and Bute Council.
11. Public Event: The provisions of Regulation 7(2) require the prospective applicant to hold at least two public events where members of the public may make comments. It is advised that the location/venue of any such event and the date(s) and time(s) at which it is held is given careful consideration in order to include as large a cross-section of the community as possible; in some cases where the proposed development will affect a number of communities separated by significant distances then it may be necessary to hold a public event in more than one location. The provisions of Regulation 7(3) specify that the public event shall not be held earlier than 7 days after notification of the date and place of the event is published in a notice in a local newspaper.
12. Publication of notice: The provisions of Regulation 7(2) also require the prospective applicant to advertise the proposed development in a local newspaper which circulates in the locality of the proposed development, this notice must contain:
 - i) A description of, and location of, the proposed development;
 - ii) Details as to where further information may be obtained concerning the proposed development;
 - iii) The date and place of the public event;
 - iv) A statement explaining how, and by when, persons wishing to make comments to the prospective applicant relating to the proposal may do so; and
 - v) A statement that comments made to the prospective applicant are not representations to the Planning Authority and if the prospective applicant submits an application there will be an opportunity to make representations on that application to the Planning Authority.

Argyll and Bute Council have provided an advert template within the PAC Process Pack which may be used for this purpose.
13. Additional Consultation: Prospective applicants should use a range of methods and techniques to ensure that they access all sections of the community in question. Ultimately this process will benefit prospective applicants, as without a proper understanding of the context, communities will not be able to provide the sort of informed input that is of most use to prospective applicants when developing proposals. Advice on effective community engagement is contained within the Government's Planning Advice Note 81; the Council's PAC Process Guidance contains other references which may be of use in identifying good practice in community consultation.

What happens next

Within 21 days from receipt of the proposal of application notice the Planning Authority may require that the prospective applicant undertake additional consultation/public events/newspaper advertisement if, having due regard to the scale, nature and likely impact of the proposed development, it considers this necessary. If there is no response to a proposal of application notice by the Planning Authority within 21 days then only the statutory minimum 'PAC' activities will be required although prospective applicants will also be required to fulfil any additional activities specified in the proposal of application notice.

Appendix B Exhibition Boards

Who Are ILI?

We are a clean energy developer who have been developing renewable energy projects for over 15 years. This has included onshore wind, solar and run river hydro schemes, with our focus now on energy storage.

As we seek to play our part in meeting Scotland's future energy needs and contribute to our world leading climate change and net zero targets, we have developed a portfolio of battery and pumped storage hydro projects.

Energy Storage projects will be of critical importance as we move towards 100% renewable energy generation as they provide the balancing and back-up services a secure and efficient energy system requires.

Our lead pumped storage hydro project, Red John, received Scottish Government planning consent in June 2021. In recognition of this success, we were finalists in the 2021 Scottish Green Energy Awards and in the Regen Green Energy Awards 2023.



Dun Na Cuaiche, Inveraray—view south to Loch Fyne



Loch Shore (National Cycle Route 78)- view east across Loch Awe



Ben Cruachan – view south along Loch Awe



Dorlin Point- view south along Loch Awe

The Planning Process, Environmental Impact Assessment

Planning Process

Pumped storage hydro schemes with an electrical output greater than 50 Mega Watts (MW) require consent from the Scottish Ministers under Section 36 of the Electricity Act 1989. This is often referred to as a Section 36 consent.

Our application for Section 36 consent will be submitted to and managed by the Energy Consents Unit (ECU), a government department, with the final decision being taken by the Scottish Ministers. Argyll and Bute Council will be a key consultee.

Environmental Impact Assessment (EIA)

EIA is the process of identifying, evaluating, and mitigating the likely significant effects of a proposed development. Independent environmental experts are conducting a range of environmental studies to assess what potential effects a pumped storage hydro scheme could have.

The scope of these studies is agreed with the ECU in consultation with the appropriate regulatory bodies, such as NatureScot, Scottish Environmental Protection Agency (SEPA), and the local planning authority. The results of these studies will help to inform the design of the pumped storage scheme and protect the environment by reducing potential effects on receptors such as the local community, recreation and tourism, landscape, wildlife, and water quality.

The EIA is undertaken in parallel with the engineering development of the pumped storage hydro, which ensures that means of reducing potential effects can be embedded into the scheme design.

The studies will be presented in an EIA Report which will also contain a non-technical summary. The results of the EIA will ensure that the potential environmental effects of the pumped storage hydro are known to decision-makers, including the Scottish Ministers and Argyll and Bute Council to inform their determination of consent.



Ardanaiseig Garden and Designed Landscape- view south along Loch Awe



Minor road - near A815- view north to Inverary

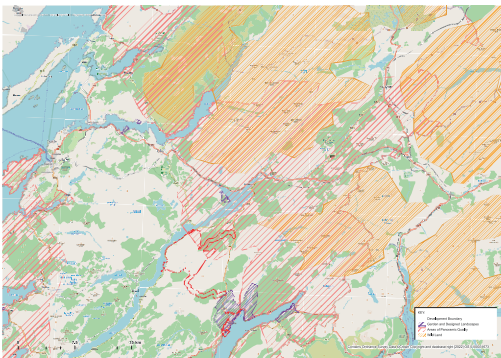
Landscape and Visual Amenity

The pumped storage hydro (PSH) scheme is located within an area of remote upland landscape. The landscape is dominated by the presence of Loch Awe and the craggy upland moorland to the west. The Headpond is situated within the upland moor and partially enclosed by rounded knolls whilst the Tailpond would occupy an area at the loch shore near Balliemanoch.

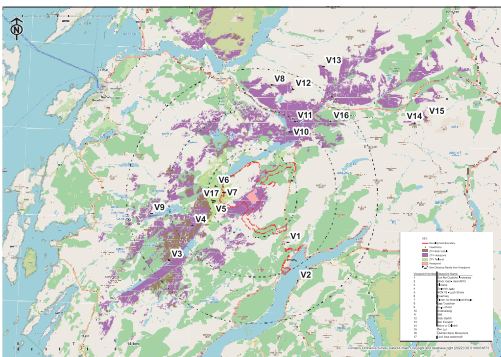
The primary aim of the landscape and visual assessment is to provide an objective way of understanding and assessing the likely change that the PSH scheme will have on the character and appearance of the surrounding landscape and on views experienced by people living there and using it. Parts of the PSH scheme will be visible from a number of locations in the surrounding area, and the assessment will consider the location of selected representative viewpoints to be used in the assessment. These viewpoint locations have been discussed and are currently being agreed with relevant stakeholders, including Argyll and Bute Council and NatureScot, and are used to help understand the likely change that could be experienced as a result of the introduction of the scheme.

As part of the assessment, visualisations of the PSH scheme within the existing landscape will be produced to help inform the Scottish Ministers decision. These will be available for viewing within the EIA Report.

The landscape and visual assessment is influencing the design of the scheme, helping to limit the effects on the landscape and on views and enabling the design of the scheme to be responsive and sympathetic to the local context. Through a process of careful consideration and siting of the above ground infrastructure, sensitive design of the embankment profiles, use of native tree planting and a collaborative approach to landscape and ecological mitigation design alongside the careful selection of construction materials, the PSH scheme will be integrated as effectively as possible into the surrounding landscape.



Landscape and Visual Designations including Wild Land



Viewpoints with Zone of Theoretical Visibility

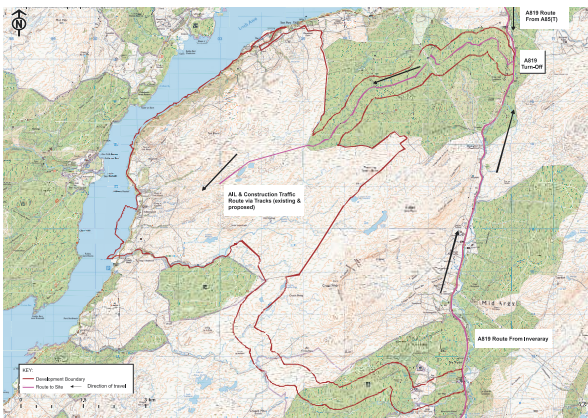
Traffic and Transportation

The Traffic and Transportation study will assess and quantify the traffic likely to be generated by the pumped storage hydro scheme during the construction phase and will determine the most appropriate route(s) to the site.

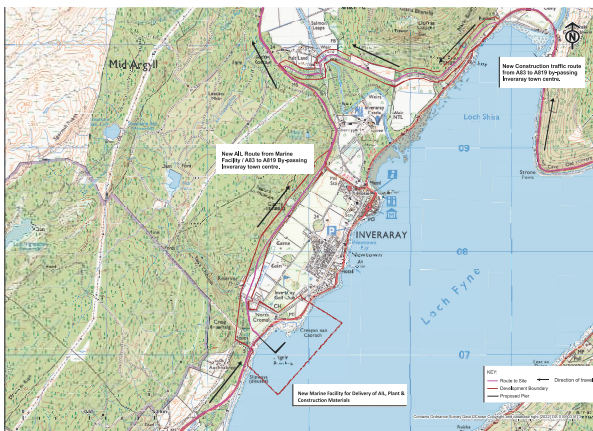
Road access to the Development for construction vehicles and staff is possible via a network of Trunk, A Class and B Class Roads (The Transport Study Network). Currently, it is anticipated that a large proportion general construction traffic would access the site via the A85 (T), likely coming from both the east and west, to reach the A819 and the site access. Additionally, The A83 (T) would likely be used by a proportion of general construction traffic coming to the site from the east or southwest. From the A83 (T), construction vehicles would by-pass Inveraray on temporary haul routes before turning onto the A819 north of Inveraray. It is not envisaged that abnormal load vehicles would travel long distances on the A83 (T).

Abnormal and Indivisible Loads (AIL) and larger construction components and machinery will not use the A85 or A83. They will arrive via a new marine facility to be constructed on Loch Fyne south of Inveraray. They will transfer from boat to road at the new marine facility. From here they will be moved across the A83 and by-pass Inveraray on a new haul road, before joining the A819 and routing to site.

Traffic and transport impacts will be minimised and managed through a Construction Traffic Management Plan (CTMP) which will take local feedback into account and be developed in consultation with Argyll and Bute Council, Transport Scotland, and Police Scotland.



Route to site from the north



Route to site from the south

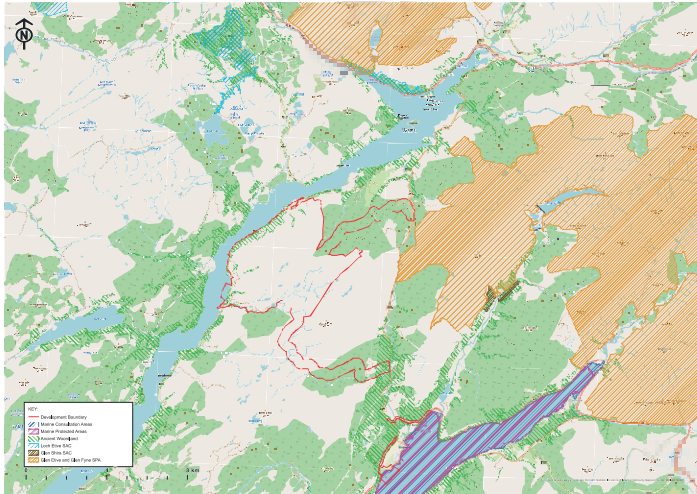
Terrestrial, Aquatic and Marine Ecology and Ornithology

Argyll and Bute provides habitat for a wide range of species including some of national and international importance. Areas such as Glen Etive and Glen Fyne, Loch Etive Woods, Glen Shira and Loch Fyne have been designated for the protection of a number of habitats and species including oak and ash woodlands, otters, golden eagle, flame shell and horse mussel beds, ocean quahog and burrowed and sublittoral mud habitats.

A suite of ecological surveys looking at the habitats, plants and wildlife around the pumped storage hydro scheme is currently underway. Relevant surveys for the area have been selected based on what the local habitat can support, and the scope has been developed in consultation with Argyll and Bute Council, NatureScot, Marine Scotland and the Scottish Environment Protection Agency. The surveys cover:

- Priority and/or other notable habitats
- Rare or otherwise notable plant species
- Invasive non-native species
- Protected mammals (including otter, pine marten, water vole, badger and bats)
- Breeding birds and non-breeding waterbirds
- Aquatic ecology (including fish)
- Marine ecology (including habitats and species)

The surveys are conducted by suitably qualified experts in line with statutory requirements and the methodologies provided in national and best practice guidelines. The results from the surveys will factor in the design of the pumped storage hydro scheme and influence the construction programme to ensure the effects on ecology are minimised. The ecological assessment, including the results of the surveys will be reported within the EIA Report.



Ecology and Ornithology Designations

Flood Risk and the Water Environment

The area contains a network of watercourses and small lochs which drain this upland area towards Loch Awe and Loch Fyne. Loch Awe is located within the River Awe catchment and is the longest and third largest freshwater loch in Scotland. Loch Fyne is a sea loch off the Firth of Clyde and forms part of the Cowal peninsula. Loch Fyne is both the longest and deepest of Scotland's sea lochs.

Water is a valuable resource and a multitude of uses from drinking, navigation and nature conservation to fishing, bathing and energy generation makes this an important aspect of the proposals. There is existing hydropower generation in place in the area, involving dams, aqueducts and electricity infrastructure. These existing hydro-schemes such as the Cruachan scheme already affect the region's water resources.

These topics of the EIA report will assess:

- Water resources – the potential changes in water levels and flows in surface water features and groundwater;
- Hydromorphology – the physical effects of the pumped storage scheme on surface waters features;
- Water quality – how the pumped storage scheme may alter the chemical composition and ecological status of receiving and surrounding water features and groundwater;
- Water supply – identifying any licenced water supplies (particularly drinking water) and any unlicenced private water supplies and assessing how the pumped storage scheme may interact with these; and
- Flood risk – by modelling peak flood flows within Loch Awe and the wider catchment, in addition to the operation of the pumped storage scheme and effects on flood risk at flood receptors.

A separate Flood Risk Assessment and a Water Framework Directive Assessment will be carried out and included in the EIA report as technical appendices.

The outcome of this assessment feeds into the design and operation of the pumped storage hydro scheme, including appropriate siting of new infrastructure to avoid water bodies where possible, the design of watercourse crossings, surface water management and pollution control to avoid issues with any sensitive water bodies or drinking water supplies.

We have consulted with Argyll and Bute Council for information on any known private water supplies in the area. If you have a private water supply you would like us to know about, then please let us know by speaking to one of our representatives at the public exhibition and filling out a brief questionnaire or by emailing us at pumpedstorage@aecom.com



Eilean na Moadail peninsula- View south along the loch shore

Protecting the Environment

A number of other environmental studies and assessments will be undertaken as part of the environmental impact assessment and will be reported within the Environmental Impact Assessment Report. These include:

- **Noise & Vibration** - Will determine the existing noise levels and allows future noise limits to be set for the construction and operational phases. A Noise Management Plan will be prepared and agreed with stakeholders as part of the EIA. The assessment will also consider vibration from construction activities and construction traffic on public roads.
- **Air Quality** - The likely air quality impacts will be from dust generated during construction and emissions from temporary generators for construction power. A Dust Management Programme will be prepared.
- **Recreation and Tourism** - Access will be maintained during construction while safeguarding public safety, which may mean temporarily closing or diverting local routes or trails at specific times during construction. All routes will be reinstated post-construction to an equivalent or greater standard for those routes affected and the wider network where possible.
- **Ground Conditions and Geology** - The design of the PSH will be informed by peat surveys and ground investigations that will help to site and route the scheme elements.
- **Heritage** - Both designated and non-designated heritage assets in the area will be assessed with effects on heritage setting also considered. The assessment will be informed by national and local heritage records and also on site surveys.
- **Climate** - Climate resilience will be factored the design of the PSH and embedded into site wide mitigation and management plans.
- **Forestry** - Plans for felling, restocking and forest management practices as a result of the construction of the Development, in addition to issues of forestry waste will be addressed as part of the EIA.
- **Marine Physical Environment and Coastal Processes** - The proposed Marine Facility is located within the Upper Loch Fyne and Loch Goil Marine Protected Area. The EIA will assess the potential impacts of the proposed Marine Facility on physical marine and coastal processes.
- **Shipping & Navigation** - The EIA will assess potential impacts relating to shipping and navigation including impacts on current shipping and sea users from the movement of plant/material by sea and from construction of the marine facility.
- **Commercial Fisheries** - The proposed Development, through the proposed scope of the EIA will seek to work with the fishing community to manage potential interactions during construction and will operate safely and un-intrusively alongside the commercial fisheries activities within the area.

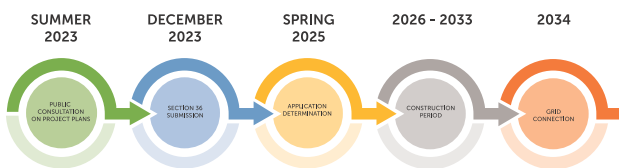
Construction Phase Mitigation and Indicative Programme

Construction Environment Management Plan (CEMP)

A Framework Construction Environment Management Plan will be produced in support of our Section 36 application and will set out a range of measures such as core construction working hours, key management and monitoring activities to be carried out by the contractor. The CEMP acts as a means for transferring the construction mitigation identified within the EIA Report into practice. The CEMP is a crucial document during the construction phase and any mitigation identified in the CEMP must be complied with by construction contractor(s). It will also detail the procedures for complaints.

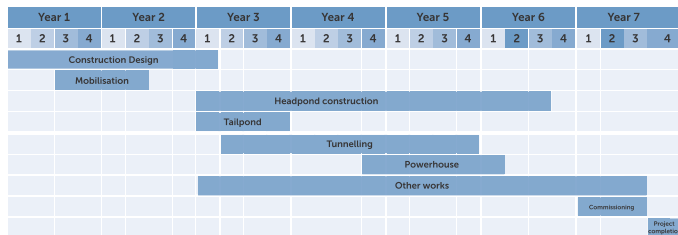
Indicative Programme

It takes several years to plan and develop this type of project. Subject to obtaining consent it would take approximately seven years to construct the scheme.



Construction

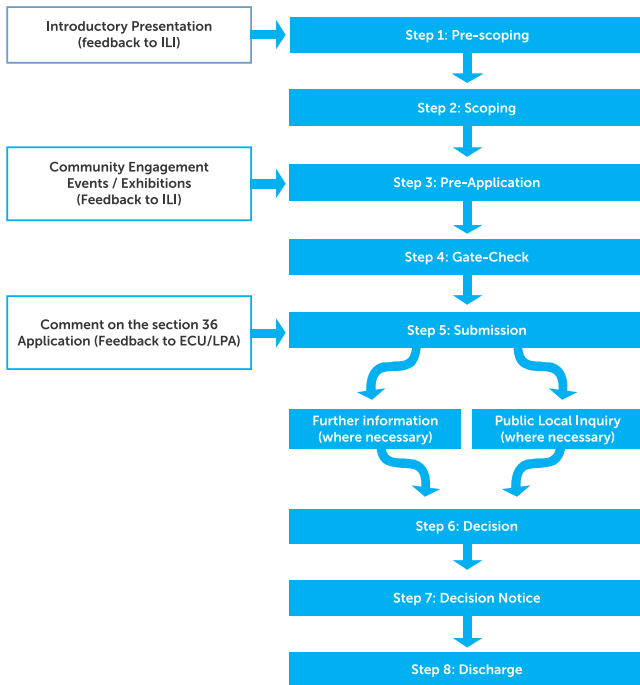
Construction of the Project could potentially start in 2026, with construction activities to be completed within seven years followed by a commissioning phase. The figure below shows an indicative programme.



Dalavich Jetty- view east across Loch Awe

Further Information and Feedback

The Consultation Process



This public exhibition is an opportunity for you to make comments to us on our proposals for the pumped storage hydro scheme before we make our application. Your comments, along with the results of ongoing environmental studies will inform the final design of the pumped storage hydro scheme.

Once the application for Section 36 consent has been submitted to the ECU and consent requested from the Scottish Ministers, you will be able to read full copies of the EIA Report online and at advertised locations within the local community. You will also be able to make comments via the ECU or local planning authority websites.

We encourage you to provide feedback on our proposals. There are several different methods you can use:

- Get in touch by speaking to one of our representatives at the public exhibitions
- Complete one of our feedback forms and questionnaires available at the public exhibition
- Visit the project website and use the online feedback form: www.balliemeanochpsh.co.uk
- Email us at: pumpedstorage@aecom.com

We cannot guarantee consideration of feedback provided via methods not listed above (such as on social media).

Please provide any comments by 18th August 2023.

