

# Cruachan Expansion Project – EIA Gatecheck Report

Version 1.0 February 2022

# Table of contents

## Contents

<b>Table of contents .....</b>	<b>2</b>
<b>About this Document .....</b>	<b>3</b>
Document – Overview.....	3
Where can I find help with this document?.....	3
<b>Document details .....</b>	<b>4</b>
<b>1 Introduction .....</b>	<b>5</b>
1.1 Background .....	5
1.2 The Site and Proposed Development.....	5
1.3 Public Engagement .....	6
<b>2 Design Strategy and Evolution .....</b>	<b>7</b>
2.1 Overview .....	7
2.2 Site Selection and Initial Design .....	7
2.3 Design Evolution .....	9
<b>3 EIA Scoping Outcomes.....</b>	<b>11</b>
3.1 Overview .....	11
3.2 Design & Strategy Comments.....	11
3.3 Assessment & Reporting Comments.....	14
<b>4 Next Steps .....</b>	<b>35</b>
4.1 Overview .....	35
<b>Appendix A Figure 1: Site Location Plan .....</b>	<b>36</b>
<b>Appendix A Figure 2: Indicative Schematic .....</b>	<b>37</b>
<b>Appendix A Figure 3: Upper Intake Drawings .....</b>	<b>38</b>
<b>Appendix A Figure 4: Access Road Plans.....</b>	<b>39</b>

# About this Document

## Document – Overview

This Gatecheck Report has been prepared to summarise work undertaken by the project team since the submission of the Cruachan 2 Environmental Impact Assessment Scoping Report to the Scottish Ministers in June 2021 and the adoption of an EIA Scoping Opinion on 29th October 2021. The purpose of this report is to explain how the design of the Proposed Development has evolved in response to Scoping responses and to confirm how design and assessment matters raised in EIA Scoping responses are being addressed. The report describes how EIA Design Freeze for the Proposed Development has been reached and outlines the approach to environmental mitigation development, taking account of EIA Scoping responses and local community feedback from the public exhibitions held in July, November and December 2021.

## Where can I find help with this document?

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# Document details

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# 1 Introduction

## 1.1 Background

- 1.1.1 Drax Cruachan Expansion Limited (“the Applicant”) intends to apply to the Scottish Ministers under Section 36 of the Electricity Act 1989 for consent for the construction and operation of the ‘Cruachan Expansion Project’ (the “Proposed Development”), on the northern banks of Loch Awe, to the west of Lochawe village within the Argyll and Bute administrative area (Appendix A, Figure 1).
- 1.1.2 This Gatecheck Report has been prepared for submission to the Scottish Government’s Energy Consents Unit (“ECU”) by Stantec UK on behalf of the Applicant to summarise work undertaken by the project team since the submission of the Cruachan 2 Environmental Impact Assessment Scoping Report (‘the EIA Scoping Report’) to the Scottish Ministers on 30<sup>th</sup> June 2021 and the adoption of an EIA Scoping Opinion on 29<sup>th</sup> October 2021. In doing so, the purpose of this report is to explain how the design of the Proposed Development has evolved in response to Scoping responses and to confirm how design and assessment matters raised in EIA Scoping responses are being addressed. The report describes how the final design of the Proposed Development to be assessed within the EIA (“EIA Design Freeze”) has been reached and outlines the approach to environmental mitigation development, taking account of EIA Scoping responses and local community feedback from the public exhibitions held in July, November and December 2021.

## 1.2 The Site and Proposed Development

### The Site

- 1.2.1 The Proposed Development will be focussed on land around and to the east of the existing pumped storage hydro Cruachan Power Station (“Cruachan 1”) on the northern banks of Loch Awe in Argyll and Bute (National Grid Reference for Cruachan Reservoir: NN 080 282). The Site is located within the administrative boundary of Argyll and Bute Council (“ABC”) (Appendix A, Figure 1).
- 1.2.2 The Site encompasses the existing Cruachan 1 facilities, including Cruachan reservoir, the underground power station and visitor centre. Existing private and public roads which connect the A85 to Cruachan Reservoir (including St Conan’s Road), part of the A85, Falls of Cruachan railway station, part of the Oban to Glasgow railway line, and parts of Loch Awe also lie within the boundaries of the Site.

### The Proposed Development

- 1.2.3 The Proposed Development seeks to optimise use of the existing Cruachan Reservoir and Dam through development of a new underground power station and associated infrastructure adjacent to Cruachan 1 to provide up to 600MWe additional generating capacity. The Proposed Development may be variously referred to as the Cruachan Expansion Project or Cruachan 2 and will be operated in conjunction with the existing 440MWe Cruachan 1 – either in generating or pumping mode, or a combination of the two modes. Both power stations will use Loch Awe as the lower reservoir (tailpond) and Cruachan Reservoir as the upper reservoir (headpond).
- 1.2.4 The Proposed Development will comprise the following main operational elements:
- **Upper Control Works** – A new intake structure including tower, screens, gates, gate hoisting arrangement, etc. would be located within and adjacent to Cruachan reservoir to direct water into a new headrace tunnel and underground waterway system;
  - **Underground Waterway System** – A series of underground shafts and tunnels carrying water between the upper reservoir and lower reservoir, through the underground powerhouse cavern;

- **Powerhouse Cavern** - A series of underground caverns containing reversible pump-turbines and motor-generators together with associated equipment such as transformers and switchgear. The construction process will require various interconnecting tunnels to allow construction;
- **Substation** – An above ground substation may be required to provide the connection to the existing 275KV circuit that connects to Dalmally sub-station, located some 7km to the east.
- **Ventilation Shaft** – A ventilation shaft will be required to circulate fresh air through the underground access tunnel and cavern power station complex. It is noted that this may also include a cable shaft for the 275kV oil filled cable from the transformers to cable sealing ends/sub-station;
- **Tailrace Tunnel** – A concrete-lined low-pressure tunnel including a downstream surge shaft will conduct water between the pump-turbines and Loch Awe, the lower reservoir. Upstream of the lower control works, the tailrace will contain an underground gate chamber and gate shaft, housing tailrace tunnel gate.
- **Lower Control Works** – Comprising screened inlet / outlet structure and stop logs, positioned in Loch Awe at the end of the tailrace tunnel below the water level. These structures would channel water in and out of Loch Awe;
- **Quayside** – Constructed on the northern shore of Loch Awe to facilitate the construction of the underground access tunnels, waterway system and powerhouse cavern, and the temporary storage of spoil prior to its off-site removal;
- **Administration building** - above ground administration and workshop buildings required for day to day operational and maintenance tasks – located on the quayside;
- **Access Tunnels** – A main access tunnel would be provided for accessing the underground power plant, close to the shore of Loch Awe. This will cross connect to the existing Cruachan 1 to allow personnel to easily move between the plants and provide a further means of access/egress; and
- Existing service roads will be used as far as possible to facilitate the long-term operation of the generating station. Some upgrades of these roads may be required to facilitate access by heavy machinery and the removal of spoil.

### 1.3 Public Engagement

- 1.3.1 In July 2021 the first public consultation took place online, and included a virtual exhibition room with electronic feedback forms and live events for members of the public to ask questions of the project team. Two hybrid consultation events took place in November and December 2021, with in person events at Dalmally and Taynuilt, with accompanying virtual events taking place at the same time. The in-person events had approximately 110 attendees who provided in person consultation responses.
- 1.3.2 All feedback from these events has been taken account of within subsequent design iterations throughout 2021 and 2022. This engagement has allowed the views of local communities to be taken account of in a series of design iterations as well as in developing a tailored strategy to maximise local benefits.
- 1.3.3 Future consultation events will be taking place in person on the 15<sup>th</sup> and 16<sup>th</sup> March 2022 at Dalmally and Taynuilt with accompanying virtual events also available online at the same time.

# 2 Design Strategy and Evolution

## 2.1 Overview

- 2.1.1** This chapter outlines the design strategy adopted for the Proposed Development and explains how the design has evolved from the maximum development parameters which were included within the Design Basis Report (2020) and were subject to EIA Scoping in 2021.

## 2.2 Site Selection and Initial Design

- 2.2.1** The existing Cruachan 1 is located within a natural corrie on the southwest facing slope of Ben Cruachan, producing a maximum 440 megawatts (MW) of electrical output in generation mode whilst up to 482MW can be imported from the grid when in pump mode. Given the current electricity market conditions and drive towards net zero generation by 2045<sup>1</sup>, there is a clear need (identified at government level) for increased low carbon flexible generation.
- 2.2.2** The infrastructure at Cruachan 1 is ideally suited for expansion and development of a new and complimentary pumped storage hydropower scheme. The initial design work (Design Basis Report, Stantec 2020) identified the potential to develop a project which would operate alongside the existing scheme and deliver an additional 600MW of electrical output in generation mode. This can be delivered with limited environmental impact given the existing available infrastructure.
- 2.2.3** The opportunity to expand Cruachan 1 presents the opportunity to utilise much of the current infrastructure. There is no requirement for a new dam, new reservoir or modifications to the existing reservoirs. This as a whole presents huge carbon savings in terms of materials requirements and energy used for construction. It also means that the existing dam, which is Category B listed, does not require any modifications to its structure. Additionally, there will also be minimal hydrological changes to Loch Awe with the operation of the new facility.
- 2.2.4** The development of the new facility will not be detrimental to the operation of the existing facility or its current efficiency rates. The two projects together can help facilitate increased low carbon generation, whilst also providing grid balancing services.
- 2.2.5** The Design Basis Report prepared in 2020 identified that the most suitable location for the new plant would be to the east of the existing power station. This decision was made based on the more suitable geology, the ability to develop infrastructure in Loch Awe and improve constructability; and a less complicated means of access for the new Main Access and Tailrace Tunnels to be routed under the A85 and Glasgow- Oban railway line.
- 2.2.6** The initial design (schematic included at Appendix A, Figure 2) assessed within the EIA Scoping Report included the following operational elements:
- **Upper Control Works** – An additional intake structure including tower, screens, gate and gate shaft located within Cruachan reservoir to direct water into a new headrace tunnel and underground waterway system;

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<sup>1</sup> Update to the Climate Change Plan 2018 – 2032: Securing a Green Recovery on a Path to Net Zero. Published 16<sup>th</sup> December 2020.

- **Underground Waterway System** – A series of underground shafts and tunnels carrying water between the upper reservoir and lower reservoir, through the underground powerhouse cavern;
- **Cavern Powerhouse** - A series of underground caverns containing reversible pump-turbines and motor-generators together with associated equipment such as transformers and switchgear. The construction process will require various interconnecting tunnels to allow construction;
- **Substation** – An above ground substation to provide the connection to the existing 275KV circuit that connects to Dalmally sub-station.
- **Ventilation Shaft** – A ventilation shaft to circulate fresh air through the underground access tunnel and cavern power station complex. It is noted that this may also include a cable shaft for the 400kV oil filled cable from the transformers to cable sealing ends/sub-station;
- **Lower Control Works** – Comprising two screened inlet / outlet structures and stop logs, positioned in Loch Awe at the end of the tailrace tunnel below minimum water level to channel water in and out of Loch Awe;
- **Quayside** – Constructed on the shore of Loch Awe to facilitate use of the Loch for the transport of heavy equipment and materials, and the temporary storage of tunnel spoil prior to its off-site removal;
- **Administration building** - above ground administration and workshop buildings required for day to day operational and maintenance tasks – located close to the upper reservoir;
- **Access Tunnels** – A main access tunnel for accessing the underground power plant, close to the shore of Loch Awe. This will cross connect to the existing Cruachan 1 to allow personnel to easily move between the plants and provide a further means of access/egress; and
- Existing service roads would be used as far as possible to facilitate the long-term operation of the generation station. Some upgrades of these roads may be required to facilitate access by heavy machinery and the removal of spoil.

2.2.7 The following temporary works required for the Proposed Development were assessed as part of the EIA Scoping Report:

- **An upper site compound** would be established in the vicinity of the existing dam. Once construction work for the Upper Control Works and sub-station is complete, this compound would be removed and the land restored;
- **A lower site compound** including workers' welfare facilities and office accommodation will be established to the North East of Lochawe village, with access from the Stronmilchan Road. Once construction work is complete, this compound would be removed and the land restored;
- **A section of the proposed Quayside** may be temporary in nature depending on the final scheme design. If so, any temporary sections of the jetty will be removed following completion of construction works and the loch shore re-instated;
- **A temporary diversion of the A85 onto the quayside** may be required in order to facilitate construction of the initial sections of the main access tunnel. The A85 would revert to its current alignment once the initial access tunnel works at Loch Awe are complete;
- A railhead or rail sidings in the vicinity of Lochawe Village in order to facilitate removal of spoil by rail. Once construction work is complete, this would be removed and the land restored. This would be subject to discussion with Network Rail and the train operating companies.

2.2.8 A set of maximum development parameters were also assessed within the EIA Scoping Report, which included the following:

- 600MW powerhouse (anticipated to consist of either 4 x 150 MW generating units, 3 x 200 MW generating units or 2 x 300 MW generating units)
- The upper inlet-outlet structure to be located on the south eastern reservoir rim, approximately 200 m upstream of the main dam axis.
- The lower inlet-outlet works to be located immediately to the east of the existing Drax operational area on the Loch Awe foreshore.
- A new lochside structure in Loch Awe to allow access for the development of the inlet outlet structure as well as operational access to the Proposed Development. The quayside was assessed as a maximum size of 300m x 50m.

## 2.3 Design Evolution

2.3.1 At time of the Design Basis Report and subsequent June 2021 EIA Scoping Report, there were outstanding design amendments and decisions to be made. These design changes have now been made and have been included into the final design. These can loosely be broken down by project elements (Upper Works, Lower Works and Access Road) and are summarised in Table 2.1 below.

Table 2.1: Summary of Changes to Design

Element of Project	Scoping Report Assumptions (June 2021)	Revised Design (February 2022)
Upper Works	Upper intake structure proposed within Cruachan Reservoir. This would have required extensive structures within the reservoir and meant a full drawdown of water within the reservoir, meaning that Cruachan 1 would have had an outage period of over 6 months.	<p>The intake structure has been relocated to the east, with a significant proportion to be constructed on the eastern bank of the reservoir, on dry land. Although this will result in a need to remove rock from the hillside and the upper intake structure will potentially be more visible (with a larger above ground structure), the need for an underground gate shaft and extensive construction inside the reservoir will be avoided. This significantly de-risks this element of the Proposed Development by enabling construction to take place on the landward side of the reservoir within a dry works area meaning a less complex construction process. It will also reduce the overall drawdown period for the reservoir to around 4-5 weeks. This will allow the existing Cruachan 1 plant to have a significantly reduced outage period.</p> <p>Several iterations of the revised upper intake structure have been developed and the final solution, presented in Appendix A Figure 3 represents a balance between engineering constructability and limiting visual impact as far as reasonably practicable. Further refinement of this part of the project is anticipated, which will further reduce the excavation of rock from the hillside. The current design details therefore represent a worst-case scenario.</p>
Access road from A85 to dam	Unsure of nature or extent of road widening and included the potential to use the access road for the removal of spoil.	<p>The extent of road widening has now been clearly defined and is presented on Appendix Figure 4. Where possible (in the upper part of the access road close to the dam and the lower part of the access road close to St Conan's Road) the access road will be widened to 4.7m to allow 2 way traffic and HGV movements. However, the middle part of the access road is significantly constrained. Therefore, there will be a need for traffic management in this middle part of the access road. This will consist of traffic lights and a one-way system with HGV queuing.</p> <p>Given the need for this traffic management, as well as feedback from the initial consultation events regarding concerns over vehicle movements</p>

Element of Project	Scoping Report Assumptions (June 2021)	Revised Design (February 2022)
		on St. Conan's Road, The Applicant has committed to not removing any spoil or rock from the upper works via the Dam access road. Instead, all spoil generated by the upper works will be dropped down the main tunnel shaft and penstocks and removed via the main access tunnel at Loch Awe.
Lower Works (A85 Diversion)	The Scoping Report indicated that to construct the main access tunnel, the A85 would need to be diverted temporarily onto the quayside structure built in Loch Awe.	The A85 is now proposed to be temporarily diverted via an existing car-parking layby (also on the A85) to the east of the Cruachan 1 plant at the Falls of Cruachan railway station.  This will allow a simpler and safer diversion, a more straightforward construction process and reduce the likely duration of the diversion to a period of 3-4 months, reducing disruption to traffic on the A85. Alternative car parking facilities will also be provided at the Cruachan Visitor Centre whilst these temporary works are underway
Lower Works (location of tunnels)	The Scoping Report presented an indicative layout with the Main Access Tunnel to the west and Tailrace tunnel to the east.	The position of the Main Access Tunnel and Tail Race Tunnel have been switched. This has the advantages of: easier connection between Cruachan 1 and the Proposed Development; easier to construct the Main Access Tunnel at a lower level, thereby given more clearance under the railway line and A85; and also less potential for hydrological interference between the tailrace tunnels of Cruachan 1 and the Proposed Development. Operationally it would mean that any plant, machinery and personnel accessing the Proposed Development would not have to travel across the tailrace structure, thereby minimising risk of damage.
Options for spoil removal	A number of options for spoil removal were explored in the Scoping Report.	It is intended that spoil will be dealt with primarily in three ways: Re-used on site including for quay reclamation; where appropriate, provided to local quarry operator(s) for subsequent re-use in the local market, and/or taken off site for use in the wider construction market.  However, for assessment purposes the EIA will assume a worst case that 100% of spoil is transported by road both to the east and west on A85.
Construction Compounds	A number of options were explored in the Scoping Report.	Approximately 9ha of compound areas will be required close to the Site. This will most likely be within an area of land to the east of the project, to the north of the B8077, close to Castles Farm.

- 2.3.2 The design strategy outlined in the EIA Scoping Report (2021) has been applied throughout the design process, resulting in a finalised design which achieves all of the pre-determined design objectives. This demonstrates that the Proposed Development delivers an appropriate balance between responding to the climate emergency through maximising renewable energy generation and respecting environmental sensitivities. The achievement of the design objectives also demonstrates the environmental acceptability of the Proposed Development, which will support an assessment of accordance against relevant national and local planning policies.

# 3 EIA Scoping Outcomes

## 3.1 Overview

3.1.1 In accordance with statutory requirements and best practice, the EIA Scoping Report:

- Explained the design strategy and key development parameters selected for the Proposed Development;
- Provided information to facilitate input from key consultees to the design strategy, resulting in an optimal design of the Proposed Development;
- Identified the nature and extent of likely effects on the environment from the Proposed Development, which at this stage have the potential to be 'significant' and therefore require detailed assessment through the EIA process;
- Outlined the proposed methodology to identify, assess and address likely significant environmental effects from the Proposed Development through the EIA process; and,
- Sought the views of the Scottish Ministers and key consultees regarding the above matters, including through presenting a number of key questions to be addressed in scoping consultation responses. Consultees were specifically asked to provide comments regarding the:
  - Objectives of the design strategy;
  - Proposed maximum development parameters; and
  - Proposed design principles and embedded mitigation measures.

3.1.2 In accordance with Regulation 12 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, the EIA Scoping Report was submitted to facilitate the adoption by the Scottish Ministers for a formal EIA Scoping Opinion, which was duly provided in October 2021. This EIA Scoping Opinion has directly informed the design of the Proposed Development at EIA Design Freeze and forms the basis of the EIA being undertaken for the Proposed Development.

3.1.3 All EIA Scoping comments were collated into a database and reviewed by the project team. Comments relating to design matters were flagged as requiring initial action throughout the design process, whilst comments regarding technical assessment and reporting matters were noted as requiring to be addressed through the EIA process.

## 3.2 Design & Strategy Comments

3.2.1 Table 3.1 below provides a summary of all EIA Scoping comments received regarding design and associated strategy matters, together with a summary of how they have been addressed by the project team in developing the design of the Proposed Development as presented at EIA Design Freeze.

Table 3.1: EIA Strategy associated consultation comments and responses

Consultee	Comment	Response
Marine and Coastal Development Policy Officer - ABC	The contractor must provide a CEMP including proposed mitigation, and Method Statement. The Method Statement must detail the proposed works. The CEMP and Method Statement should be agreed by the Council in consultation with NatureScot prior to works commencing.	A framework Construction Environmental Management Plan (CEMP) will be submitted in support of the consenting applications, which will outline methods to avoid, reduce and mitigate construction effects on the environment. This will be consulted upon with ABC and agreed as part of the permission prior to works starting on site.
	Under Policy 42 – Safeguarding Piers, Ports and Harbours; development proposals for a new temporary pier, port or harbour facilities will only be considered where it has been clearly demonstrated how the whole site including any related access and working areas can be restored to the satisfaction of the planning authority once the facilities are no longer required.	Restoration will be discussed in consultation with ABC. It is assumed for the purpose of the EIA that the quayside would remain and be reused as a permanent structure, as environmental effects of removal would be greater than leaving in situ.
ECU	Scottish Ministers request that a separate annex to the EIA report be provided, setting out briefly in tabular form, and with references to the detailed sections of the EIA report, the likely significant effects of this Proposed Development on the factors set out in Regulation 4 (3) of the 2017 Regulations; and the features of the development or measures envisioned in order to avoid, prevent or reduce any such effects, where applicable.	The topics within this section will be assessed within the EIA Report, and a separate table will be included as an Appendix to the EIA Report.
	The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to the chapter on each topic area.	Mitigation will be included in detail as its own section for each chapter of the EIA Report. An overview will be provided in the conclusion of each chapter.

Consultee	Comment	Response
	Scottish Ministers consider that given the scale and nature of the proposal, the applicant should consider where appropriate within the EIA report the risks to human health, cultural heritage or the environment arising, for example, due to the potential for accidents or disasters.	Where relevant in discipline specific chapters, the EIA Report will cover the assessment of potential for accidents and disasters. Within the project description chapter of the EIA Report we will cover the risk and potential for accidents and disasters during construction and operation, and appropriate mitigation measures.
Glenorchy & Innishail Community Council	The scoping report does acknowledge that there will be significant disruption to the local communities of Lochawe and Dalmally. It is hoped that all mitigation measures to minimise disturbance to the community will be implemented and that the community will be supported throughout.	A number of mitigation measures to avoid disruption to the local communities will be implemented, including traffic management processes, and will be set out in detail within the EIA Report.
RSPB Scotland	We advise that the EIA should include an assessment of related projects, especially any grid connection, related transport developments and cumulative impact of other consented and active projects, since these have potential effects and the EIA should take a holistic view of impacts.	A list of committed developments which have the potential of creating cumulative impacts will be provided with the EIA Report, and these will be assessed cumulatively in relation to all environmental topics (as relevant). Projects not yet consented but likely to come forward in a similar time to the Proposed Development will also be considered and included within the committed development list.

### **3.3 Assessment & Reporting Comments**

- 3.3.1 The tables below highlight comments made by consultees on the scope and methodology of the EIA Report and associated surveys, as presented in the Scoping Report. There is a separate table for each environmental topic included in the Scoping Report.

Table 3.2: Summary of EIA Scoping Comments and Responses – Ground Conditions (EIA Scoping Chapter 7)

Name of Consultee	Comment	Response
SEPA	Table 7-1 reports that no groundwater abstractions are known within 1km of the proposed infrastructure. Should this be confirmed to be the case then the EIAR can simply state this fact. If not, the EIA should demonstrate all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m. Please refer to our Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions for further advice on the minimum information we require to be submitted.	The EIA Report will confirm either that groundwater abstractions are greater than 1km from the proposed infrastructure or, where necessary, provide the information required by the SEPA Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions
	We understand it is anticipated that the project will avoid impacts on peat and that a 'peat probing exercise will be carried out to confirm the absence of peat'. Should this be confirmed then we expect the EIAR to report this. If peat is identified on site, we request the submission include: a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Guidance on Developments on Peatland - Peatland Survey (2017)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat.	Where relevant, the EIA Report will report the presence of peat in line with Scottish Government's Guidance on developments on Peatland - Peatland Survey (2017). Where relevant, re-use proposals will be detailed in line with Scottish Government's Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste, and Developments on Peat and Off- Site uses of Waste Peat. If necessary a full Peat Management Plan will be prepared.
	b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.	
	Proposals must accord with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste and our Developments on Peat and Off-Site uses of Waste Peat. Dependent on the volumes of peat encountered applicants must consider whether a full Peat Management Plan is required.	
ECU	Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard risk assessment, one should be carried out. The assessment should provide a clear understanding of whether any risks identified in the assessment 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) should be followed in the preparation of the EIA report, which should contain such assessment and details of mitigation measures. If one is not provided, clear justification for not carrying out such a risk assessment.	Where relevant the EIA shall include a peat landslide hazard risk assessment in line with the Scottish Government's Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition)

Table 3.3: Summary of EIA Scoping Comments and Responses – Hydrology (EIA Scoping Chapter 8)

Name of Consultee	Comment	Response
Argyll Salmon Fisheries Board	<p>We are aware that the current scheme abstracts water from several different watercourses in the Awe and neighbouring catchments.</p> <p>It is unclear to us at this time how the expansion will affect these watercourses and if improvements in the compensation flows are to be made to bring them up to current standards for new developments.</p>	<p>As has been previously indicated in the technical note 'Cruachan 2 Environmental Impact Assessment: understanding likely scheme impact on water levels within Cruachan Reservoir and on Loch Awe', which was appended to the EIA scoping report, the expansion will not alter current abstractions. This will be confirmed within the EIA chapter.</p>
	<p>We would also require more information on the effects of increased water discharge created by the expansion of the current scheme. The changes to loch level have potential to influence the flows in the River Awe as regulated by Scottish &amp; Southern Energy. We need to be assured the working arrangements between the two operators considers the potential for exacerbation the discharge of water into the River Awe, particularly during flood flow releases following storm events.</p>	<p>As has been previously indicated in the technical note 'Cruachan 2 Environmental Impact Assessment: understanding likely scheme impact on water levels within Cruachan Reservoir and on Loch Awe', which was appended to the EIA scoping report, Loch levels are not expected to fundamentally change. This will be confirmed within the EIA chapter.</p>
GICC	<p>There is concern within the Glenorchy &amp; Innishail community about the construction and operation of Cruachan II with regards to:</p> <ul style="list-style-type: none"> <li>• control of the water level of Loch Awe and destruction of water margins.</li> </ul> <p>G&amp;ICC ask that consideration be given to the community around Loch Awe and the impact that the artificially controlled loch level has on the land around the loch. What effect will the operation of another pumped storage scheme have on what to us as a community is Loch Awe, the longest freshwater loch in Scotland, but to DRAX and SSE is the Loch Awe Reservoir.</p>	<p>As has been previously indicated in the technical note 'Cruachan 2 Environmental Impact Assessment: understanding likely scheme impact on water levels within Cruachan Reservoir and on Loch Awe', which was appended to the EIA scoping report, Loch levels are not expected to fundamentally change, therefore there is no anticipated impact upon water margins around the Loch. This will be confirmed within the EIA chapter.</p>

Name of Consultee	Comment	Response
SEPA	Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR) 2.3. The proposed scheme will require an authorisation from us under CAR. We therefore welcome the intention to twin track the CAR and Section 36 applications as stated in Section 1.2.2. This will help to ensure that any CAR requirements can be accommodated more easily when proposals are at their most fluid.	Stantec intend to consult with SEPA and submit a CAR application in parallel to the S36 submission.
	Other elements of the scheme must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, diversions or other engineering activities in the water environment cannot be avoided then the submission must include a map showing: a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses; b) A buffer of at least 10m drawn around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works; & c) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.	The EIA will contain a map showing all proposed temporary or permanent infrastructure overlain with all lochs and watercourses, including a buffer of at least 10m drawn around each loch or watercourse. If this minimum buffer cannot be achieved, the required information will be provided for each breach. Details of all proposed mitigation will be provided.
	If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided. Further advice and our best practice guidance are available within the water engineering section of our website.	There is no change to the current abstraction of the Loch (covered by current CAR license). There are no groundwater abstractions or dewatering proposed.
	As there is no plan to build a second reservoir or increase the capacity of the existing Cruachan Reservoir no more water will be passed down to Loch Awe than at present although it is expected that it will be passed/pumped quicker. Section 8.6.3 states “the overall changes in water level will be insignificant compared to the baseline volumes of water in both water bodies and the natural variability in water levels through rainfall, seasonal variations, run off and river inputs”. 3.2. While we welcome that the water levels will not be any higher in Loch Awe than at present, we recommend this, and the underpinning rationale, is reported in the EIAR so that people who live and work on the shores of the loch understand this more rapid variation in water levels.	This will be reported in the EIA. This was a key finding of the technical note 'Cruachan 2 Environmental Impact Assessment: understanding likely scheme impact on water levels within Cruachan Reservoir and on Loch Awe', which was appended to the EIA scoping report, and outlined the rationale underpinning the outcomes that water levels will not be any higher in Loch Awe than at present. This will be confirmed and reiterated within the EIA chapter.

Name of Consultee	Comment	Response
ABC	It is considered by the Planning Authority to be premature at this time to scope out the following matters from the EIA for the reasons set out in this scoping consultation response: Changes to the hydrological regime of Cruachan Reservoir and Loch Awe. The Council and ECU are aware of an imminent proposal for a 1.5Gw pump storage S36 proposal which would also seek to extract water from Loch Awe. A scoping request is likely to be submitted to ECU by Mid October. Therefore, there will almost certainly need to be a need for potential cumulative impacts upon the hydrological regime of Loch Awe to be examined before this matter can be agreed to be scoped in or out of the EIA.	A cumulative effects section will be included within the EIA. Further details of this additional scheme will be requested, in order to undertake a thorough cumulative assessment.
Marine Conversation Officer - ABC	The applicant is requested to submit full details of the Surface Water Drainage Strategy, including mitigation measures within their Flood Risk Assessment. It will be important that the Proposed Development does not attribute to an increase in excess surface and ground water accumulations. It will also be important that the development does not attribute to an increase in pollution and any siltation/spoil entering Loch Awe and Cruachan Reservoir, or groundwater bodies (principally Oban), including private water supplies.	A Flood Risk Assessment and accompanying Surface Water Drainage Strategy will be submitted alongside the EIA chapter.
	The applicant is advised to adhere to good practice measures for working in and near to watercourses during the construction phase, and should include: <ul style="list-style-type: none"> <li>o Installation of silt interception traps to minimise unchecked contaminated run-off;</li> <li>o Appropriate artificial drainage must be designed and installed;</li> <li>o Fuels and other chemicals must be stored securely within the site construction compound;</li> <li>o Trenches and excavations must be covered at the end of each working day.</li> <li>o Appropriate wash-out facilities must be available for vehicles and machinery;</li> </ul>	Response noted. These measures will be included within the CEMP.
Biodiversity ABC	I have reviewed the supporting information in relation to its effect on the woodland designation and adjacent habitats. Whilst I note that mitigation is embedded in the design principles further scoping assessment work is proposed to cover the following: <ul style="list-style-type: none"> <li>• Increased road runoff and pollution potential associated with the temporary diversion/extension of the A85 and increase in road traffic haulage and plant movements;</li> <li>• Mobilisation by wind and rainfall-runoff of stockpiled material into Loch Awe</li> <li>• Potential increases in surface water runoff due to an increase in permanent impermeable surface areas during the operational phase.</li> </ul>	Consideration of these potential effects will be considered within the EIA chapter, and mitigation will be proposed as appropriate. A Flood Risk Assessment and accompanying Surface Water Drainage Strategy will be submitted alongside the EIA chapter.

Name of Consultee	Comment	Response
ECU	Public and private water supplies Scottish Water provide 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 (via EIA@scottishwater.co.uk) and makes further enquiries 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.	Information about private water supplies has already been obtained from Argyll & Bute council. Public water supplies have been requested from SEPA. Asset plans and drinking water protected areas will be requested from Scottish Water. The EIA Report will include details 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.	

Table 3.4: Summary of EIA Scoping Comments and Responses – Ecology (EIA Scoping Chapter 9)

Name of Consultee	Comment	Response
Argyll District Fisheries Board	The report indicates that a fish and fisheries survey (2017) of which we are unaware of the scope of the survey or its findings. We would like to be consulted on the report findings and its relevance to the responsibilities of Argyll DSFB.	The 2017 Report has been issued to Argyll DSFB. The 2021 survey report will be available in January 2022.
	We would also need to know the proposed monitoring that will occur because of the development.	Monitoring requirements will be determined following the 2021 Report included with the EIA Report.
Marine Science Scotland	NatureScot advise that the Environmental Impact Assessment (EIA) report should include details regarding any potential adverse impact on Arctic Charr populations and proposed mitigation measures. MSS agree with this, adding that the potential impacts on all of the above fish species are considered throughout the construction and operation of the Proposed Development.	Surveys for Arctic Charr have been undertaken. Currently, based on the restrictions to the gill netting survey methodology, we have utilised electro-fishing methods on the marginal areas of both water bodies as well as the inflowing burns to the Cruachan reservoir to allow informed decision making. However, due to the landscape on both Loch Awe and Cruachan Reservoir the electro-fishing has been kept to limited areas as a result of steep shelving into deep water close to the shoreline. Consequently, no evidence of Arctic Charr has been recorded in these surveys. In addition, the boat based fish habitat surveys have uncovered no confirmation of Arctic Charr or suitable spawning habitat in the red-line boundary areas. The findings of these surveys will be reported in the EIA Report. Lastly, it should be noted that water levels on the Cruachan

Name of Consultee	Comment	Response
		<p>Reservoir fluctuate on a daily basis. When our initial fish habitat walkover survey was conducted the water level was significantly higher than when we returned to do another part of our survey works. If there was any suitable spawning habitat in these areas it would be inaccessible to Arctic Charr due to the rising and falling water level and its impacts on Charr eggs. It is considered unlikely that standard, non-invasive techniques will detect this species in Cruachan Reservoir. However, a worst case scenario has been assumed for the assessment within the EIA Report and it has been that Arctic Charr are present.</p>
	<p>There are no details provided on the proposed surveys for fisheries and freshwater invertebrates and MSS would welcome further information. These surveys should provide sufficient information to carry out a rigorous assessment of the potential impacts on the fish species, specifically in Allt Cruachan, in the vicinity of the Proposed Development on Loch Awe and on Cruachan Reservoir.</p>	<p>A broad fish habitat assessment of the littoral zone was undertaken on both Loch Awe and the Cruachan Reservoir. This involved perpendicular boat transects from the shoreline into each water body to a depth which exceeded 10m. This is an adapted method based on that used for a whitefish species developed by Coyle and Adams (2011). Additionally, fish habitat walkover surveys were conducted on the inflowing burns to the Cruachan reservoir. The main focus of this survey was to identify whether any salmonid fish spawning habitat would be impacted by the change in water level regime proposed as part of the Proposed Development. Furthermore, timed fish population surveys were carried out on the marginal areas of both water bodies. In terms of freshwater invertebrates, 3-minute kick samples were undertaken in the 10 inflowing burns to the Cruachan Reservoir. Moreover, 5 sweep samples were employed around the marginal areas on both water bodies. Samples have been identified and sorted to family and species level. Details of findings of fisheries and freshwater invertebrates will be reported in the EIA Report</p>
	<p>The developer proposes to scope out watercourses draining into Loch Awe which MSS are content with (Section 5.14 of the scoping report); however we advise that the River Awe, which drains out of Loch Awe, should be scoped in. The developer should consider whether salmon smolt acoustic studies will be required in Loch Awe to provide information on the migration of smolts through Loch Awe from the River Orchy and to assess the potential impact on the smolts as they pass the existing take-off at Cruachan. Survey work should also be considered to assess any potential impact on any areas used by Arctic charr for spawning in the vicinity of the proposed take off. The fisheries for each of the above fish species should be described and the likely impact on associated fisheries assessed. Potential</p>	<p>Based on bathymetric data and boat surveys conducted in the Loch Awe redline boundary, the depth of water and existing substrate around the take-off would be unsuitable for Arctic Charr Spawning. Results from the surveys and proposed mitigation measures, including any further monitoring will be reported on in the EIA report.</p>

Name of Consultee	Comment	Response
	<p>cumulative impacts on fish populations as a result of the operation of both Cruachan schemes and the Loch Awe Barrage should also be considered. Full details regarding the proposed surveys including methodology, results from the surveys, proposed mitigation measures and any further monitoring should be presented in the EIA report.</p> <p>MSS recommend that the developer, if they have not already done so, should contact the Argyll District Salmon Fishery Board and Argyll Fisheries Trust for information regarding local fish stocks.</p>	
	<p>ii. There are historical records of Arctic Charr in Cruachan Reservoir. This species has not been referred to in the scoping report. It may be the case that the project will not have any adverse impact on this species but such a conclusion and any mitigation required should be considered and discussed in the EIAR.</p>	<p>Please refer to Arctic Charr response above.</p>
	<p>The site includes part of Loch Etive Woods SAC. As such the Habitat Regs will have to be considered. The analysis of impacts on this SAC need to be detailed and sufficiently robust to help inform a Habitat Regulations Assessment under the Habitat Regulations, ideally including all the information required to fully inform an Appropriate Assessment (AA) which may have to be undertaken by the competent authority. We will advise on the need for an AA in our response to the consultation on the associated section 36 application.</p>	<p>We acknowledge that an HRA will be needed for the Proposed Development, not just for the Loch Etive Woods SAC but also for the Glen Etive &amp; Glen Fyne SPA (see below). It is anticipated that there will be direct impacts on the designated interests of the SAC. All information required to fully inform an Appropriate Assessment will be set out in the EIA Report.</p>
	<p>The proposed scope of surveys, methodologies and assessment of the key ornithological receptors identified in the Scoping Report (sections 9.4 to 9.8) will adequately assess the overall ornithological impacts. White tail and golden eagle, other Schedule 1 raptors, and black grouse are likely to be the main species of interest on the site. These should be assessed both for onsite impacts and also cumulatively at the relevant Natural Heritage Zone level in addition to any designated site assessments that might be required.</p>	<p>Vantage point surveys will continue into 2022 to provide 12 months of recent flight data for all raptors, but especially the EA forming the notified feature of the SPA. Black grouse surveys were completed in 2021. The Ornithological Impact Assessment will include consideration of the cumulative impacts at the relevant NHZ, as well as the HRA needed for the SPA (see below).</p>

Name of Consultee	Comment	Response
	The site abuts and covers parts of the Glen Etive and Glen Fyne Special Protection Area (SPA) for golden eagle. As such the Habitat Regs will have to be considered. The analysis of impacts on this SPA need to be detailed and sufficiently robust to help inform a Habitat Regulations Assessment under the Habitat Regulations, ideally including all the information required to fully inform an Appropriate Assessment (AA) which may have to be undertaken by the competent authority. NatureScot will advise on the need for an AA in our response to the consultation on the associated section 36 application.	Vantage point surveys will continue into 2022 to provide 12 months of recent flight data for all raptors, but especially the EA forming the notified feature of the SPA. The OIA will include consideration of the cumulative impacts at the relevant NHZ, as well as the HRA needed for the SPA. All information required to fully inform an Appropriate Assessment will be set out in the EIA Report.
	The main impacts on the SPA will be likely to come from disturbance due to blasting (and similar activities) and transport flights (use of helicopters). The territory concerned is NA6. Breeding activity is known to take place in the norther half of the territory and, as such, Ben Cruachan and other summits in the range will potentially provide a degree of screening/buffer to disturbance. Even so, there remains potential for eagles to be displaced (due to disturbance) from southern parts of their territory. Vantage point data and modelling will help determine the significance of this displacement. Mitigation measures may be required to compensate for this impact. It should be noted that if modelling is required to help interpret vantage point data, then the Golden Eagle Topography model (GET) should be used as opposed to the PAT model.	GET Model has been requested from NatureScot in February 2022, and will be implemented.
	Section 5.1.5 of the Scoping Reports proposes that “Changes to the hydrological regime of Cruachan Reservoir and Loch Awe” be scoped out of the EIA. It should be noted that marginal zones of Loch Awe are important for some bird species when nesting. If construction or operation of the site is likely to significantly change the existing hydrological regime (levels/speed/seasonal changes) of Loch Awe, then this aspect should be scoped into the EIA, impacts of birds assessed and the topic presented in the EIAR.	The margins of Loch Awe which will be affected by the Development are predominantly steep rocky sections, with limited suitability for nesting birds of conservation concern. Whilst some sections of Loch Awe foreshore may indeed be important for nesting birds, this is not the case for the stretch within the Site.
RSPB	The scoping report states that the impact on the water levels within Loch Awe will be negligible due to the expansion project. We would, however, advise that the installation and long-term management of diver rafts be highly considered by the developers in a way to deliver for biodiversity within the local area surrounding Loch Awe.	Opportunities for the use of diver rafts in mitigation will be considered following analysis of survey reports. Outside of the Proposed Development process, the Applicant is also working with the RSPB to consider additional biodiversity measures in the wider area.

Name of Consultee	Comment	Response
	<p>The Cruachan power station is surrounded by Atlantic Rainforest an important and increasingly rare habitat in Scotland, highlighted in the SNP manifesto as a prime example of a nature-based solution and we would advise that the developer use this opportunity to expand this habitat. Atlantic Rainforest are also rich in biodiversity, they provide habitat for well-known species like red squirrels, red listed bird species such as wood warbler and pied flycatcher and are incredibly important for Scotland's lichens and bryophytes, some species of which are found nowhere else in the world.</p>	<p>Opportunities for mitigation, compensation and/or enhancement will be explored as part of the EclA.</p>
SEPA	<p>We note updated habitat surveys are planned and that GWDTE are to be assessed in the EIA. Should GWDTE be identified on site the following information must be included in the submission:</p> <p>a) A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m; &amp;</p> <p>b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.</p>	<p>Habitat surveys have extended to a 250 m around areas of potential excavation, and to 100 m around areas of shallow excavation. Habitats have been mapped using the Scottish EUNIs system, and those considered likely to include GWDTEs allocated to an NVC type for subsequent assessment. These features will be mapped at an appropriate scale within the Technical Appendices supporting the EclA. If minimum buffers cannot be achieved, a risk assessment will be carried out.</p>
Marine Coastal Development - ABC	<p>It will be important that throughout the construction and operational phases, the applicant is advised to ensure that all naturally available habitat is accessible to fish, including: sufficient water flows; the hydrology (drainage), underlying geology, and geomorphology is not affected, and to provide mitigation against any habitat loss/damage through a habitat restoration programme. It will be important to note that:</p> <p>o A walkover habitat survey should be undertaken on the main channels of Awe catchment with the aim of quantifying and evaluating the condition of freshwater habitats utilised for recruitment by fish, and in particular salmonids;</p> <p>o The applicant is advised to consult with Argyll Fisheries Trust (AFT), Argyll District Salmon Fishery Board (ADSFB) and the Awe District River Improvement Association (ADRIA) in the first instance for further advice.</p>	<p>Walkover fish habitat surveys have been conducted on the inflowing burns into the Cruachan Reservoir. These looked to ascertain the suitability of these freshwater habitats for the spawning of salmonid fish species. In addition, boat surveys have been conducted on both Loch Awe and the Cruachan Reservoir within the redline boundary to assess the potential for salmonid spawning habitat. Arcus also undertook fish habitat and fish fauna surveys of tributaries of Loch Awe in 2017. Argyll Fisheries Trust (AFT), Argyll District Salmon Fishery Board (ADSFB) and the Awe District River Improvement Association (ADRIA) have been consulted.</p>

Name of Consultee	Comment	Response
	<p>Otters are classed as European Protected Species (EPS) under the Conservation (Natural Habitats, &amp;c.) Regulations 1994. Where there is a high likelihood of otters being present, it is recommended that an otter survey will be required, and an EPS Licence to conduct works may be required from NatureScot.</p>	<p>Full otter survey has been undertaken for the Site and a 200 m buffer of this, as per current NatureScot guidance.</p>
	<p>Under section 9.4.12 Non-avian protected species, it is stated that “species for which survey or data searches have determined are likely to be absent and for which no further work is needed, and they can be scoped out of the Ecological Impact Assessment,” including the freshwater pearl mussel, I would disagree on this view as much of the survey data is over 6 months old and is therefore out-dated.</p> <p>o The Freshwater Pearl Mussel is afforded statutory protection under Schedule 5 of the Wildlife and Countryside Act 1981; listed in Annexes II and V of the EC Habitats Directive and Appendix II of the Bern Convention; it is also listed as a Priority Species under the Argyll and Bute Local Biodiversity Action Plan. I therefore recommend that a Protected Species Survey for the Freshwater Pearl Mussel be undertaken in the vicinity of the Proposed Development (River Awe).</p>	<p>Consultation with NatureScot determined that the watercourses within the Site were not known to support freshwater pearl mussel nor represented suitable habitat for the species. Surveys for this species would therefore not be needed.</p>
Biodiversity - ABC	<p>I note that habitat surveys are robust, however, there are special gaps in terms of the Site boundary for the Proposed Development, and these will need to be infilled. In addition, it is now generally accepted that the Phase 1 Habitat Survey technique is no longer fit for purpose for EcIA, and to that end it is recommended that habitats within the required study area buffers are reclassified using Scottish EUNIS as well as NVC. The updated habitat surveys will incorporate a 250 m buffer of the Site boundary where excavations will be undertaken, to accommodate the zone of influence relevant for groundwater dependent terrestrial ecosystems (GWDTEs). The buffer in other areas will be 100 m.</p>	<p>Habitat surveys have extended to a 250 m around areas of potential excavation, and to 100 m around areas of shallow excavation. Habitats have been mapped using the Scottish EUNIS system, and those considered likely to include GWDTEs allocated to an NVC type for subsequent assessment. These features will be mapped at an appropriate scale within the Technical Appendices supporting the EIA.</p>

Name of Consultee	Comment	Response
	<p>Whilst restoration of habitats have been identified in the report, I ask that a Method Statement is included in relation to the treatment and monitoring of the vegetation and excavated materials during the construction phase and re-instatement of same post –construction. The Method Statements need to be included in the Construction Environment Management Plan. Re. further restoration methods e.g. compensatory planting of trees- I ask that outline details (species and indicate location where most likely) of same should be factored in at this stage.</p>	<p>Outline details regarding habitat restoration and enhancement will be included in the EIA, including a requirement for these to be incorporated in the CEMP.</p>
	<p>Surveys specifically have been carried out in 2017 and 2018, albeit the applicant is aware that these are absent and can be scoped out of the EclA, namely wildcat, freshwater pearl mussel, beaver and specially protected amphibians such as great crested newt.</p> <p>5.4 Comment: I note that the surveys are out of date but the applicant considers they are robust enough to remain valid except where the works where the compound is to be located. This gap needs to be addressed along with the new site boundary and those that are known to be present and active within the study area, namely fisheries, freshwater invertebrates, otter, pine marten and red squirrel surveys- prior to work commencing (albeit that a full planning application has to be submitted is granted permission) - a pre-start ecological survey on priority construction areas i.e. works compound and the areas following this as the project develops should be carried out prior to opening up these sites by the ECoW along with Tool - box talks (contained within the Construction Environment Management Plan- detail in 6.0) be given to site staff in advance of same.</p>	<p>Habitat surveys have been completed or updated in 2021 for all areas within the Site. Surveys for fisheries, freshwater invertebrates, otter, pine marten, red squirrel, badger and a Preliminary Roost Assessment (for bats) have also been undertaken, as well as 12 months of bird vantage point data.</p>
	<p>: I noted that no invasive non- native species (INNS) have been included in the EIAS, I ask that the applicant confirms that no Rhododendron ponticum or Japanese Knotweed or any INNS on the Wildlife and Country (1981) Act on the Schedule 9 list are on the development site.</p>	<p>INNS were included in the habitat survey. It is likely that a recommendation will be made that this survey should be updated prior to construction, along with relevant protected species surveys.</p>
	<p>Construction Environment Management Plan (CEMP) - I note that mitigation measures along with licencing contacts for ecological interest are to be embedded in the plan and over seen by the ECoW. I ask that Toolbox Talks are included too and updated as and when required.</p>	<p>Toolbox talks would be a standard inclusion in the remit of the ECoW and the content of the CEMP.</p>

Name of Consultee	Comment	Response
	As this development is over a number of years, I ask that ecological monitoring reports with images are submitted to the local authority on annual basis.	The ECoW would likely provide monthly reports during the construction phase. Any Biodiversity Management Plan associated with the Proposed Development would as a matter of course include monitoring prescriptions.

Table 3.5: Summary of EIA Scoping Comments and Responses – Transport and Access (EIA Scoping Chapter 10)

Name of Consultee	Comment	Response
Transport Scotland	This states that a supporting Transport Assessment (TA) will be prepared as an Appendix to the EIA Report, which will be subject to separate a scoping process with Transport Scotland. Transport Scotland would state that the application will require to be accompanied by a Stage 1 Safety Audit, and that the TA will require to address both capacity and safety issues.	RSA Stage 1 will also be provided - confirmed. The TA will include traffic capacity and road safety.
	The SR indicates that peak construction year base traffic flows will be derived from comparing the 2017 surveyed flows with ATC counts derived from the site on the A85(T) to the west of the development. Transport Scotland would state that the use of NRTF low growth factors would be acceptable in this instance.	Refer to the TA scoping report in regard to Traffic flow calculations. Agreed with regard to NRTF low growth factors.
	We note that Abnormal Indivisible Loads (AIL) will be required during construction. No mention is made of the potential Port of Entry for such loads, however, Transport Scotland would state that if the Port of Cambeltown is proposed, we would draw specific attention to the known pinch points located on the A83(T) at the Crinan Canal / Ardrishaig Basin (swing bridge), and the mini roundabout junction of the A83(T) with the A816. There are also some significant constraints on the routes from the west which would need to be considered. Transport Scotland will require to be satisfied that the size of AILs proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path. A full Abnormal Loads Assessment report should be provided with the EIAR that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken at identified pinch points and details provided with regard to any required changes to street furniture or structures along the route.	Abnormal Indivisible Loads assessment being undertaken as part of the Transport Assessment, and have used the most suitably close port (Port of Glasgow).

Argyll and Bute Council	It is considered by the Planning Authority to be premature at this time to scope out the following matters from the EIA for the reasons set out in this scoping consultation response: • Operational effects on traffic and transport; commentary on the relationship with waste generation, storage, transportation and potential impacts on the free flow of traffic on the A85 on the economy of Argyll and Bute are addressed in this response. It is accepted that the longer term operational characteristics of the proposal are unlikely to have significant impacts, but the construction phase has potential for significant impacts in respect of waste and transportation matters given the locational characteristics of the site.	Agreed in terms that the transport impacts of construction will be considered within the TA and reported in the EIA Report.
Marine and Coastal Development Policy Officer - ABC	• The applicant is to submit a Transport Assessment (TA) together with their EIA in support of the final planning application. The TA must provide complete proposed pier/jetty and wharf construction details. The proposal will need to consider cumulative infrastructure impacts during the works and to ensure continued safe access / egress during this time.	There are no proposals to move material via Loch Awe. Construction details for the quayside will be provided. Cumulative impacts of the Proposed Development will be considered as part of the EIA Report.
	• Any pier/jetty construction should be marked according to advice from the Northern Lighthouse Board. - • The applicant is advised to consult with the Northern Lighthouse Board to determine what would be the proposed affects to safe navigation or recreational boating during site construction.	There are no proposals to move material via Loch Awe. The nature of the jetty is not considered to warrant a lighthouse or equivalent navigation provisions.
	The Council is required to protect public access rights to and along the foreshore for all non-motorised users. Where there is a pier or breakwater structure that will obstruct access along a foreshore or loch side, a reasonable means of passing by the obstruction should be provided to allow the public to exercise their right of access along the shore, where appropriate.	Agreed, this will be considered within the TA.
ECU	Scottish Ministers consider that the effects of the development on traffic, transport and access, in particular during construction phase, should be assessed in the EIA report	Agreed.

Table 3.6: Summary of EIA Scoping Comments and Responses – Noise (EIA Scoping Chapter 11)

Name of Consultee	Comment	Response
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Marine and Coastal Development Policy Officer - ABC	Mitigation measures to abate noise and vibration should be deployed during the construction and operational phase of the development. Predicted noise and vibration levels should be detailed within the CEMP and EIA.	Where relevant, predicted noise and vibration levels for the construction and operation phase will be outlined within the EIA Report.
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Table 3.7: Summary of EIA Scoping Comments and Responses – Landscape and Visual Impact (EIA Scoping Chapter 12)

Name of Consultee	Comment	Response
NatureScot	We advise that the proposed methodology and scope as laid out in the Scoping Report (section 12) will adequately identify and assess landscape and visual impacts.	All elements detailed in the Scoping Report regarding methodology and scope will be covered in the LVIA chapter.
ABC	It is considered by the Planning Authority to be premature at this time to scope out the following matters from the EIA for the reasons set out in this scoping consultation response: <ul style="list-style-type: none"> <li>Cumulative Landscape and Visual Impacts Assessment (CLVIA);</li> </ul> Commentary on the potential for additional large scale infrastructure projects to cumulatively impact on the North Argyll APQ is provided and this matter should be addressed in the EIA.	An assessment of potential cumulative effects, taking into account all relevant proposed electricity development (existing/approved) will be included in the LVIA chapter. The scope of this will be agreed with ABC.
	Operational effects on the setting of heritage assets: The potential impacts upon the setting of the Category A Listed building remain uncertain at this time. This will be connected to both the extent, scale and length of time construction activities to be undertaken, and the need to ensure any visible structures/plant or machinery to be retained permanently as part of the operation requirements of the extended power station are fully considered given the sensitivity and importance of the setting of the listed building. It will also be necessary to consider carefully the wider LVIA and amenity considerations associated with this. It may be that such operational matters can be scoped out, but at this time there remains uncertainty of exactly what is proposed.	Issues concerning the setting of the Category A Listed Building will be addressed in the Cultural Heritage chapter. The LVIA will consider the effects in relation to Listed features, insofar as these features contribute to the landscape character of the surrounding area and form the focus of key views which may be affected by the Proposed Development.
Marine and Coastal Development Policy Officer - ABC	Given the proposal is highly likely to have visual impacts and cumulative effects during and after the construction phase, the applicant is requested to submit a full Landscape and Visual Impact Assessment (LVIA) together with a Zone of Theoretical Visibility (ZTV),	The LVIA for the Proposed Development will include ZTVs and supporting photomontages showing features at the upper and lower reservoirs from nearby publically accessible locations. The locations for photomontages will be agreed with ABC.

	including schematics and photomontages from key viewpoints in support of their application.	
	<ul style="list-style-type: none"> <li>The development's design and scale should respect the character and appearance of the surrounding area, and be consistent with Policy LDP 9 – Development Setting, Layout and Design, associated Supplementary Guidance and the Argyll and Bute Landscape Capacity Assessment.</li> </ul>	The design of the Proposed Development is largely technically driven. The LVIA will include recommendations to enhance the design and mitigate landscape and visual effects where appropriate and practicable.
ECU	The applicant should scope in cumulative landscape and visual impacts assessment, taking into account all relevant proposed electricity development in the planning system at the time of the assessment (existing/approved) and adopt the approach recommended by Argyll and Bute Council in respect of these matters as detailed in their response included in Annex B.	An assessment of potential cumulative effects, taking into account all relevant proposed electricity development (existing/approved) will be included in the LVIA chapter. The scope of this will be agreed with ABC.

Table 3.8: Summary of EIA Scoping Comments and Responses Cultural Heritage (EIA Scoping Chapter 13)

Name of Consultee	Comment	Response
Historic Environment Scotland	We note the proposed scope of the assessment as set out in section 13.6 of the scoping report. However, we disagree with the intention to scope out an assessment of impacts on the Category A listed Ben Cruachan Hydro Electric Scheme, Turbine Hall. From the information provided to date, we cannot agree with the statement made in paragraph 13.6.3 of the scoping report that there are no likely significant effects as a result of the proposals. We do not have enough information at this stage to understand the likely level of the impact. We also do not have enough information on the proposed embedded mitigation measures which would be put in place which are referred to in section 13.5. On this basis, this asset should be included in the	Potential impacts upon the Turbine Hall will be included in the Cultural Heritage Impact Assessment, and assessment in the EIA Report.

	scope of the assessment and reported accordingly in any Environmental Impact Assessment Report produced for this Proposed Development.	
ABC	<p>It is considered by the Planning Authority to be premature at this time to scope out the following matters from the EIA for the reasons set out in this scoping consultation response:</p> <p>Operational effects on the setting of heritage assets: The potential impacts upon the setting of the Category A Listed building remain uncertain at this time. This will be connected to both the extent, scale and length of time construction activities to be undertaken, and the need to ensure any visible structures/plant or machinery to be retained permanently as part of the operation requirements of the extended power station are fully considered given the sensitivity and importance of the setting of the listed building. It will also be necessary to consider carefully the wider LVIA and amenity considerations associated with this. It may be that such operational matters can be scoped out, but at this time there remains uncertainty of exactly what is proposed.</p>	Potential impacts upon the Turbine Hall will be included in the Cultural Heritage Impact Assessment, and assessment in the EIA Report.

Table 3.9: Summary of EIA Scoping Comments and Responses Climate Change (EIA Scoping Chapter 15)

Name of Consultee	Comment	Response
RSPB Scotland	This proposal has potential to not just deliver against Scottish Government targets for the country to be net zero by 2045, it can also address the biodiversity crisis through providing net habitat gain, with securing positive effects for biodiversity now one of the outcomes for the National Planning Framework.	The potential for the Proposed Development to help deliver Scottish Government targets for net zero will be discussed within the climate change chapter. Net habitat gain will be addressed within the ecology chapter.
ABC	It is noted that the applicants also specify those matters which they consider require to be “scoped in” and addressed by the EIA as follows: - Climate change, including carbon balance across construction and operational periods	The climate change chapter will provide a qualitative assessment outlining the likely sources of GHG emissions during construction and operation. Measures which have been embedded into the design to reduce GHG emissions will be set out in the chapter. Calculating the carbon balance was not proposed within the methodology of the scoping report, and will not be provided as part of the climate chapter.
ABC	A further list of matters the applicant suggests should be “scoped out” of an EIA is set out at 5.1.4 as follows - Vulnerability of the Proposed Development due to climate change during construction	Due to the nature of the Proposed Development, vulnerability to climate change is also scoped out during the operational phase, as detailed in the scoping report.

Table 3.10: Summary of EIA Scoping Comments and Responses Climate Change (EIA Scoping Chapter 15)

Name of Consultee	Comment	Response
RSPB Scotland	This proposal has potential to not just deliver against Scottish Government targets for the country to be net zero by 2045, it can also address the biodiversity crisis through providing net habitat gain, with securing positive effects for biodiversity now one of the outcomes for the National Planning Framework.	The potential for the Proposed Development to help deliver Scottish Government targets for net zero will be discussed within the climate change chapter. Net habitat gain will be addressed within the ecology chapter.

ABC	It is noted that the applicants also specify those matters which they consider require to be “scoped in” and addressed by the EIA as follows: - Climate change, including carbon balance across construction and operational periods	The climate change chapter will provide a qualitative assessment outlining the likely sources of GHG emissions during construction and operation. Measures which have been embedded into the design to reduce GHG emissions will be set out in the chapter. Calculating the carbon balance was not proposed within the methodology of the scoping report, and will not be provided as part of the climate chapter.
ABC	A further list of matters the applicant suggests should be “scoped out” of an EIA is set out at 5.1.4 as follows - Vulnerability of the Proposed Development due to climate change during construction	Due to the nature of the Proposed Development, vulnerability to climate change is also scoped out during the operational phase, as detailed in the scoping report.

Table 3.11: Summary of EIA Scoping Comments and Responses Waste Management (EIA Scoping Chapter 16 Section 16.3)

Name of Consultee	Comment	Response
SEPA	<p>We have reviewed the EIA Scoping Report and do not consider sufficient information has been provided justify scoping waste management out of the EIA. It is estimated the project will generate 1.2 million tonnes of material during the construction phase (peaking at 2,500 tonnes per day). This is a significant volume of spoil which will require an onward use.</p> <p>Schedule 4 of the Electricity Works (EIA) (Scotland) Regulations 2017 requires the EIA Report to include:</p> <ul style="list-style-type: none"> <li>• An estimate of ‘quantities and types of waste produced during the construction and operation phases’; and A description of the likely significant effects on the environment resulting from the disposal and recovery of waste. It is our view, given the significant volume of material that will be generated, that this should be assessed in the EIA and include a clear plan of how and where the material will be used.</li> </ul>	<p>Waste (excavation arisings) will now be considered as part of the full EIA Report by a dedicated EIA Report chapter. This will include clear estimates of the type and quantities of excavation arisings (aligned with other chapters, e.g. Ground Conditions) and high level options for material management aligned with prevailing Waste Hierarchy and Circular Economy principles.</p>

Name of Consultee	Comment	Response
	<p>Table 5-1 of the Scoping Report indicates waste management is to be scoped out of the assessment. Instead, spoil arisings generated during the construction phase will be managed through the development and implementation of an Outline Waste Management Plan (OWMP). This is to be presented as an appendix to the Ground Conditions Chapter of the EIAR. It is reported this will be a desk study and include consultation with parties which may be able to reuse the arisings (e.g. infrastructure developers, quarry and waste management operators). We support the preparation of the OWMP and the intended contents as set out in Section 7.7.7 – 7.7.12. However, it is not clear why it is not proposed to assess environmental effects of waste or to define the significance of waste impacts within the assessment itself.</p>	<p>It is noted that SEPA is supportive of the OWMP approach. Environmental effects will be considered as part of impact matrices within the dedicated EIA chapter.</p>
	<p>Section 16.3 reports bulk wastes generated during construction will comprise an estimated 1.2 million tonnes of spoil from tunnelling and excavation (likely to take the form of inert rock ‘chippings’). This is a significant volume of material. Onward use could lead to significant environmental effects and it is therefore fundamental that a use is identified at the earliest possible stage (i.e. prior to construction).</p>	<p>Assessments are currently ongoing to retain as much excavated material as possible within the site and wider construction/development thereby reducing the overall surplus. Discussions are also ongoing with local stakeholders to identify market end-uses for such material. Where possible this will seek to achieve the most preferable outcomes in terms of the Waste Hierarchy and Circular Economy with non-waste reuse and recovery taking preference over disposal.</p>
	<p>It is our expectation the EIA includes an assessment of the amount of spoil that will be generated, which should be demonstrated to be minimised as much as possible. This should also be accompanied by detailed proposals either for justifiable re-use on site (e.g. production of suitable concrete aggregates) or use or disposal elsewhere. This should include:</p> <ul style="list-style-type: none"> <li>• Appropriate maps showing reuse proposals (volume and depth);</li> <li>• Maps storage arrangements (including details of the heights and dimensions of each store, how long the material will be stored for etc) and associated temporary and permanent infrastructure; and</li> <li>• If planned, details of how the material will be processed and suitability of the material any proposed use on site.</li> </ul>	<p>Noted - these matters will be considered in the dedicated EIA Report chapter.</p>

Name of Consultee	Comment	Response
	Given the volumes it is not appropriate that this is deferred to the construction phase of the development. There needs to be a clear idea of how and where the material will be used. It is our view this should be assessed in the EIA. Our clear preference is for the materials to be put to local beneficial use (e.g. SG/Transport Scotland funded infrastructure projects).	Noted - these matters will be considered in the dedicated EIA Report chapter.
	Any waste materials will need to be removed from the site and disposed of to a suitably licenced facility or made use of via a suitable waste management exemption. We understand that there may be significant transportation issues with removal of any of the material from the site so, although not an issue directly within our remit, we recommend that the assessment includes information on transport implications.	Noted - however the term 'disposed' should be used with caution as the material could be reused off-site either as a non waste; or as a waste either as a recovery activity or disposal. The interface with transport is also noted and will be considered.
ABC	It is considered by the Planning Authority to be premature at this time to scope out effects from waste management: There is little detail on what scale of waste material will require to be mitigated, how it will be stored, how it will be transported and to where and for what purpose. In the absence of greater clarity on such fundamental matters, the Planning Authority does not consider that the scoping out of waste matters is appropriate, nor to have details of this as a conditional matter on any consent that may be granted	Noted - these matters will be considered in the dedicated EIA Report chapter.
Marine and Coastal Development Policy Officer - ABC	I1. Under Table 5-1: Technical Scope, it is stated that Waste Management is proposed to be scoped-out. If Waste Management is scoped-out, I would have concerns at this early stage. A full Site Waste Management Plan (SWMP), with appropriate mitigation measures should be included within the EIA as a supporting document;	Noted - these matters will be considered in the dedicated EIA Report chapter.

# 4 Next Steps

## 4.1 Overview

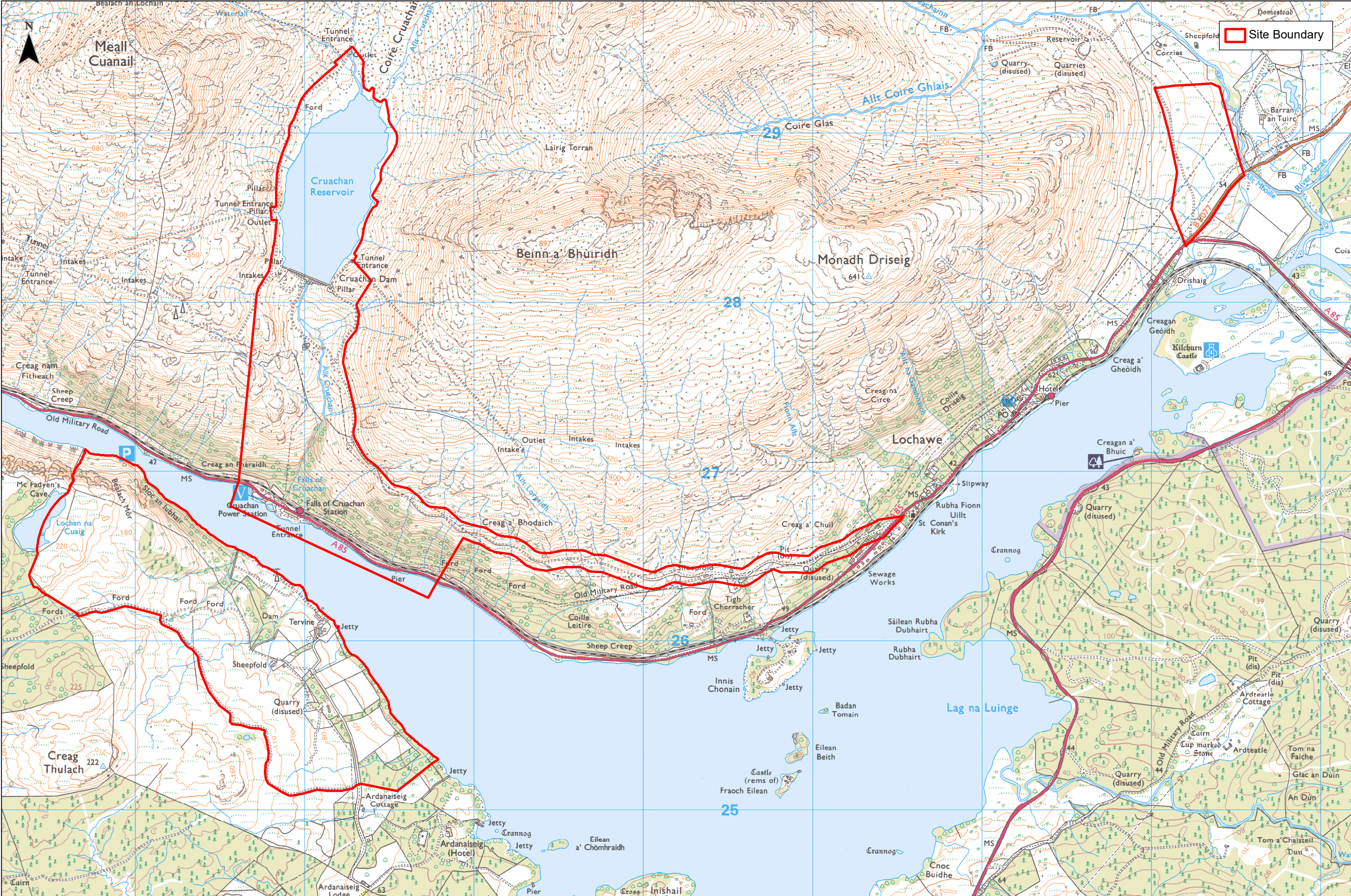
4.1.1 Following the EIA Design Freeze in February 2022, the completion of the EIA Report, and further public consultation, the Applicant intends to:

- (i) submit a Section 36 application, and seek a Direction for deemed planning permission from Scottish Ministers;
- (ii) submit an application for a Licence under the Water Environment (Controlled Activity) (Scotland) Regulations 2011;
- (iii) submit an application for Listed Building Consent, and
- (iv) submit an accompanying EIA and supplementary Reports for the Proposed Development to the Scottish Ministers in April 2022.

4.1.2 The next steps of the project are therefore:

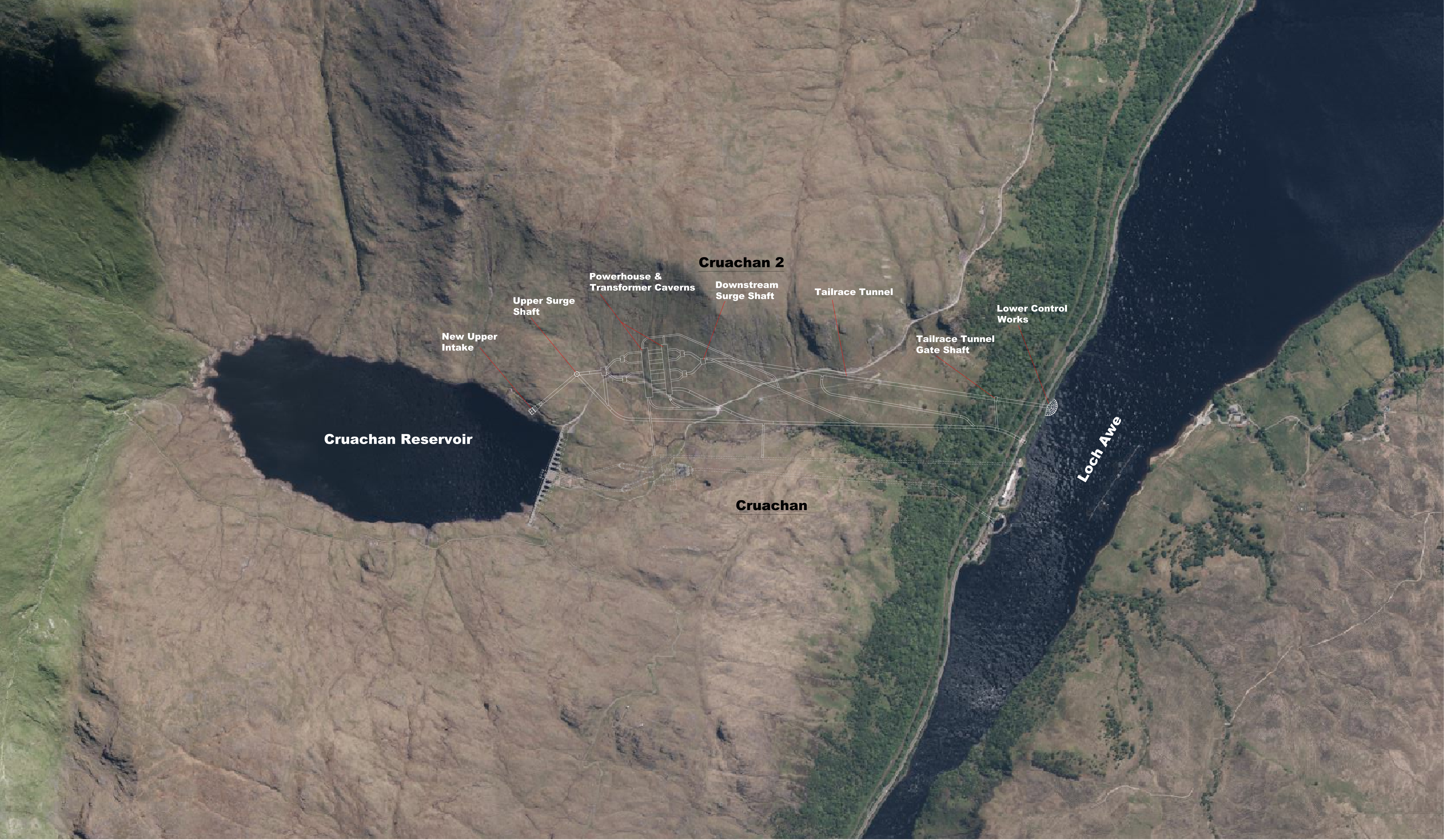
- Further public consultation in March 2022;
- Ongoing consultation with stakeholders following the EIA Design Freeze, and responding on comments to the EIA Scoping Report;
- Feedback from the ECU on this EIA Gatecheck Report;
- Complete remainder of environmental surveys to be undertaken during February and March 2022;
- Complete EIA and all supporting supplementary Reports and S36 application to be lodged in April 2022.

# Appendix A Figure 1: Site Location Plan



	Client	<b>CRUACHAN EXPANSION PROJECT</b> Site Location Plan			1:20,000 @ A3	Date: 10/02/2022
	Drax Generation Enterprise Ltd		© Crown copyright and database rights [2021] Ordnance Survey 0100031673 Contains public sector information licensed under the Open Government Licence v3.0.		Drawn: JP	Checked: CL
					Figure 01	Rev A

# Appendix A Figure 2: Indicative Schematic



**Cruachan 2**

Powerhouse &  
Transformer Caverns

Downstream  
Surge Shaft

Tailrace Tunnel

Lower Control  
Works

Tailrace Tunnel  
Gate Shaft

Upper Surge  
Shaft

New Upper  
Intake

**Cruachan Reservoir**

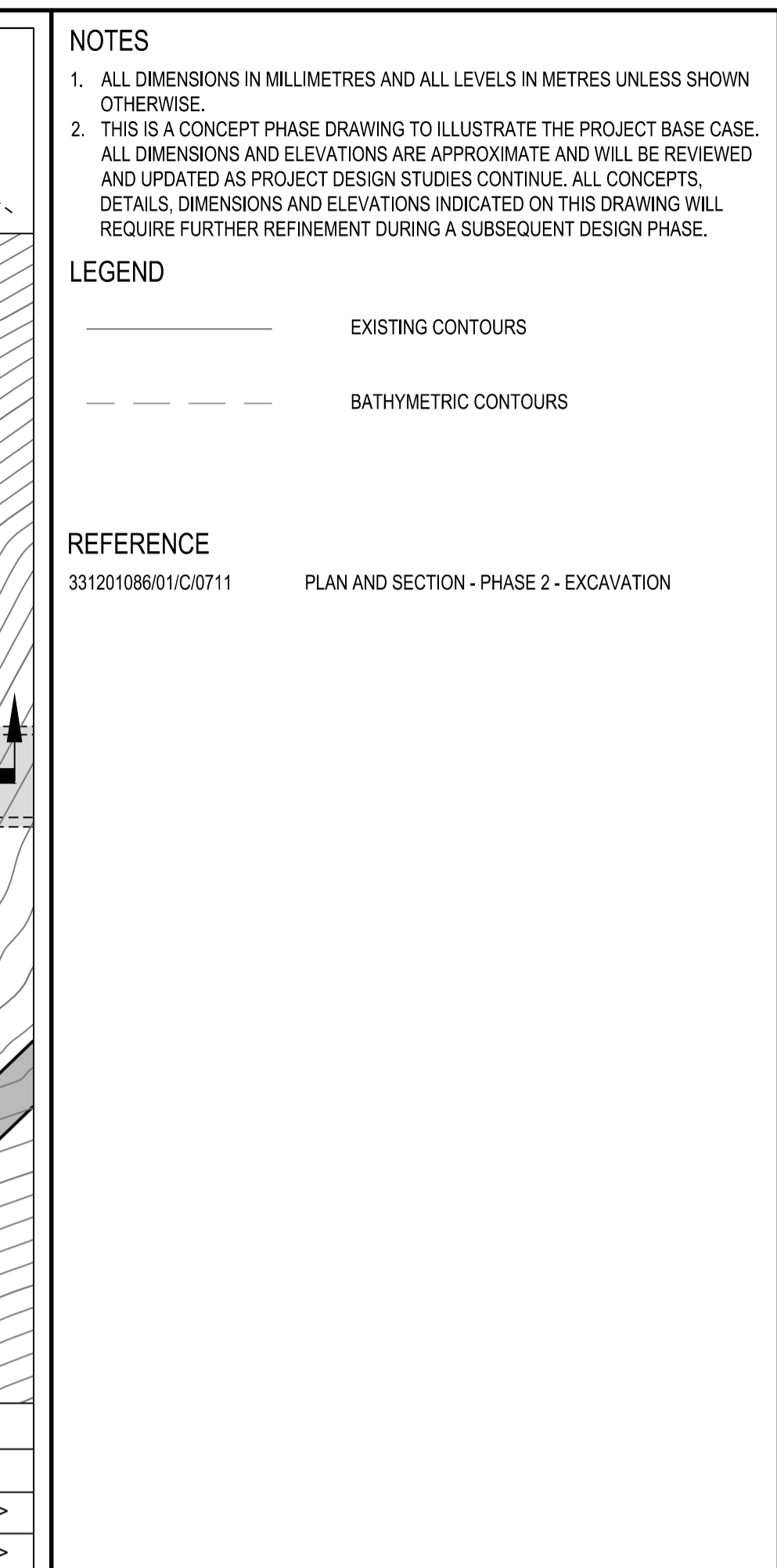
**Cruachan**

**Loch Awe**

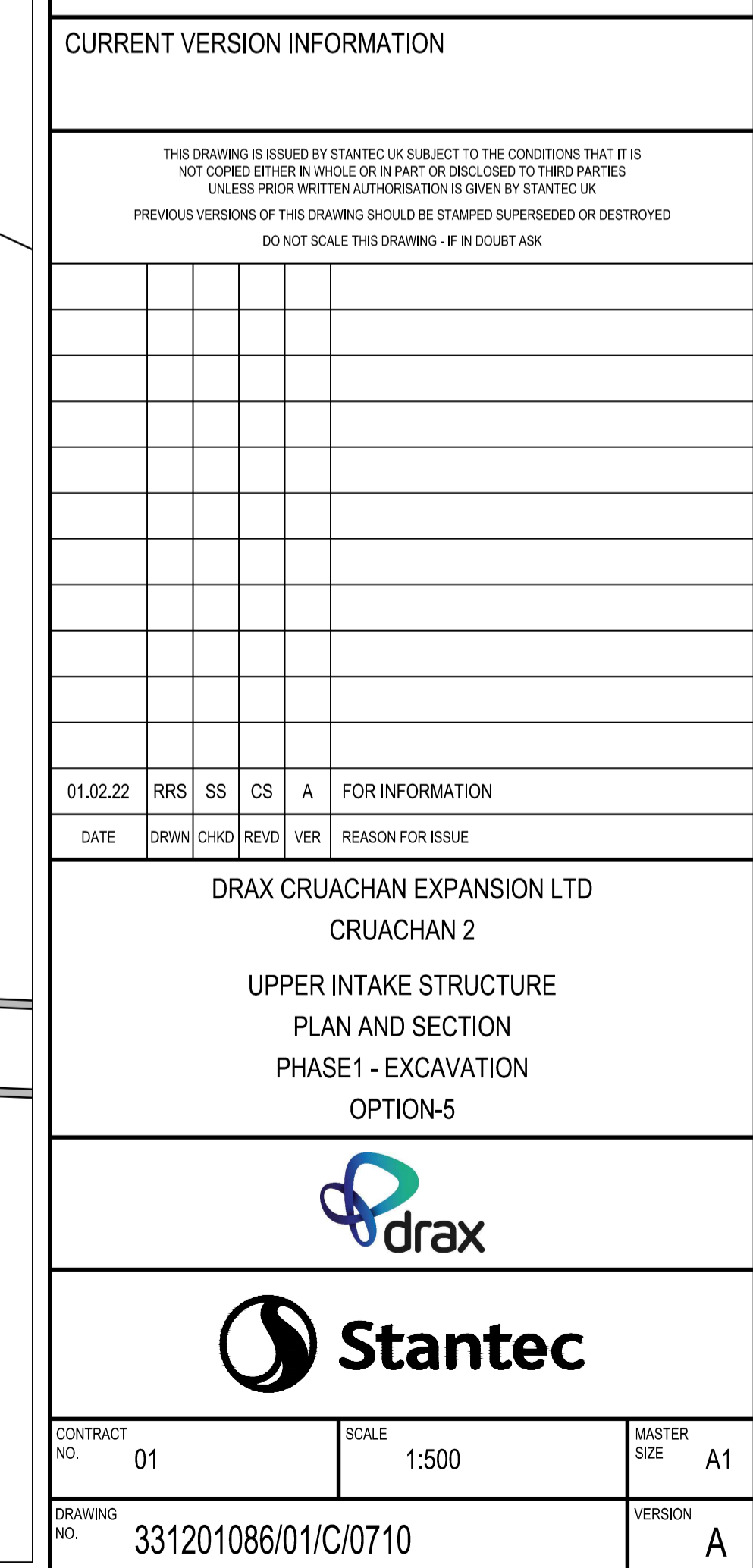
# Appendix A Figure 3: Upper Intake Drawings

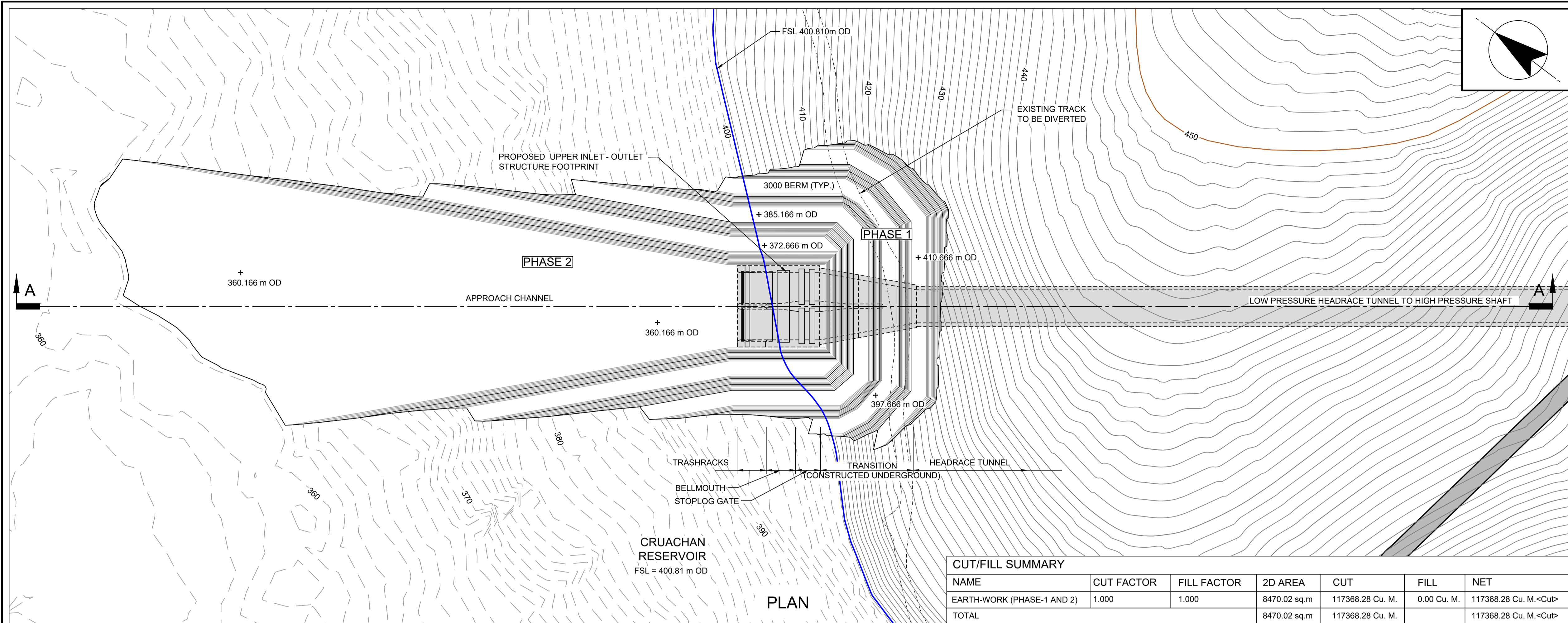


**Updated Intake Structure**



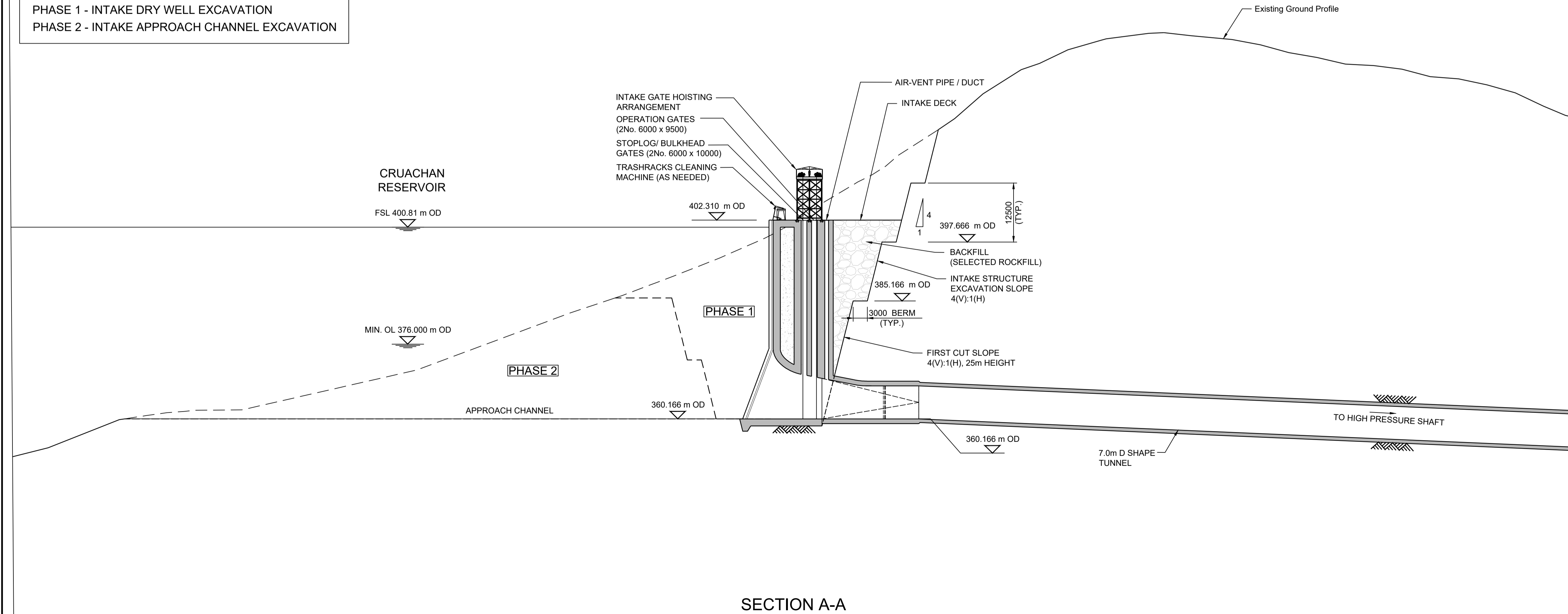
PHASE 1 - INTAKE DRY WELL EXCAVATION  
PHASE 2 - INTAKE APPROACH CHANNEL EXCAVATION





CUT/FILL SUMMARY						
NAME	CUT FACTOR	FILL FACTOR	2D AREA	CUT	FILL	NET
EARTH-WORK (PHASE-1 AND 2)	1.000	1.000	8470.02 sq.m	117368.28 Cu. M.	0.00 Cu. M.	117368.28 Cu. M.<Cut>
TOTAL			8470.02 sq.m	117368.28 Cu. M.		117368.28 Cu. M.<Cut>

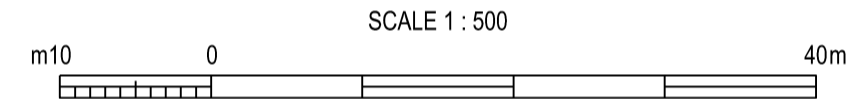
INTAKE EXCAVATION PHASES :  
PHASE 1 - INTAKE DRY WELL EXCAVATION  
PHASE 2 - INTAKE APPROACH CHANNEL EXCAVATION



- NOTES
- ALL DIMENSIONS IN MILLIMETRES AND ALL LEVELS IN METRES UNLESS SHOWN OTHERWISE.
  - THIS IS A CONCEPT PHASE DRAWING TO ILLUSTRATE THE PROJECT BASE CASE. ALL DIMENSIONS AND ELEVATIONS ARE APPROXIMATE AND WILL BE REVIEWED AND UPDATED AS PROJECT DESIGN STUDIES CONTINUE. ALL CONCEPTS, DETAILS, DIMENSIONS AND ELEVATIONS INDICATED ON THIS DRAWING WILL REQUIRE FURTHER REFINEMENT DURING A SUBSEQUENT DESIGN PHASE.

- LEGEND
- EXISTING CONTOURS
  - BATHYMETRIC CONTOURS

REFERENCE  
331201086/01/C/0710 PLAN AND SECTION - PHASE 1 - EXCAVATION



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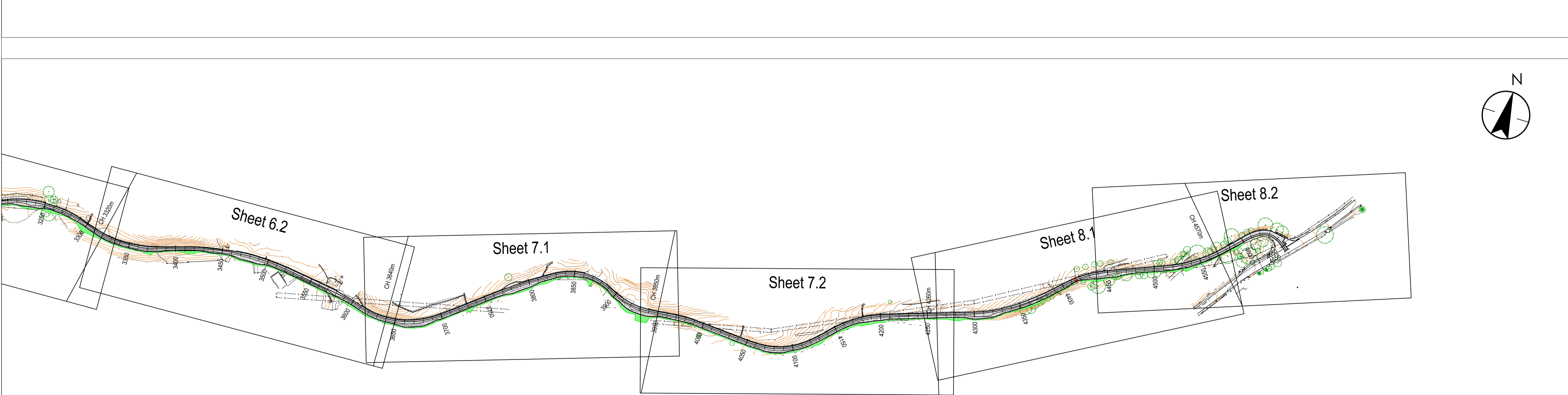
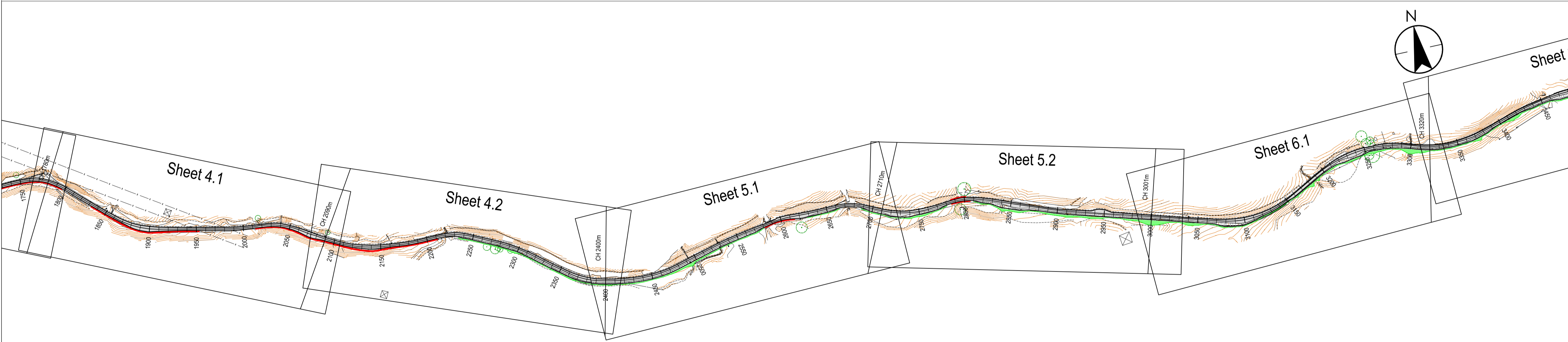
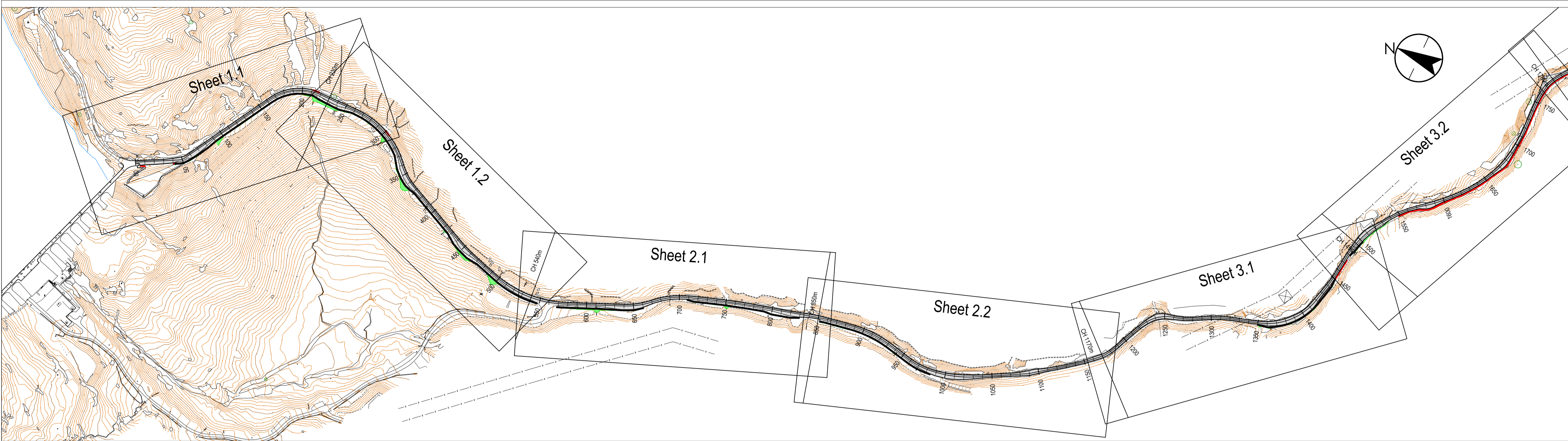
01.02.22	RRS	SS	CS	A	FOR INFORMATION
DATE	DRWN	CHKD	REVD	VER	REASON FOR ISSUE

DRAX CRUACHAN EXPANSION LTD  
CRUACHAN 2  
UPPER INTAKE STRUCTURE  
PLAN AND SECTION  
PHASE 2 - EXCAVATION  
OPTION-5



CONTRACT NO.	01	SCALE	1:500	MASTER SIZE	A1
DRAWING NO.	331201086/01/C/0711	VERSION	A		

# Appendix A Figure 4: Access Road Plans



- NOTES
1. ALL DIMENSIONS IN METERS AND ALL LEVELS IN METERS UNLESS SHOWN OTHERWISE.
  2. EARTHWORK SLOPES ASSUMED TO BE 1:2. SLOPE STABILITY ANALYSIS TO BE CARRIED OUT TO CONFIRM
  3. ROAD SIGNAGE REQUIREMENTS TO BE CONFIRMED
  4. ROAD DRAINAGE REQUIREMENTS TO BE CONFIRMED

- LEGEND
- EXISTING ROAD SURFACE TO BE SCARIFIED AND RESURFACED
  - NEW HAUL ROAD CONSTRUCTION
  - NEW VERGE
  - NEW EARTHWORKS
  - NEW VEHICLE RESTRAINT BARRIER

REFERENCE

CURRENT VERSION INFORMATION

B. LIST OF CURRENT VERSION

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15.09.21	BR	DMcL	MP	P01	DRAFT
DATE	DRWN	CHKD	REVD	VER	REASON FOR ISSUE

DRAX CRUACHAN EXPANSION LTD  
CRUACHAN 2  
HAUL ROAD  
LAYOUT PLAN OVERVIEW



CONTRACT NO.	02	SCALE	1:2500	MASTER SIZE	A1
DRAWING NO.	331201086-001-C-0801	VERSION	P01		

