



Cruachan Upgrade Project

Statement of Consultation

On behalf of **Drax Pumped Storage Limited**



Project Ref: 331201279 | Rev: AA | Date: January 2023

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Document Control Sheet

Project Name: Cruachan Upgrade Project

Project Ref: 331201279

Report Title: Statement of Consultation

Date: 12.01.2023

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For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved

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1 Introduction

1.1 Introduction

- 1.1.1 This Statement of Consultation has been prepared as part of an application submissions for consent under Section 36 of the Electricity Act 1989 to upgrade units three and four of existing pumped storage hydro power station, Cruachan Power Station (the 'Proposed Development').
- 1.1.2 Consultation was undertaken by Stantec on behalf of Drax Pumped Storage Limited ('the applicant') in September 2022. A public exhibition took place in Taynuilt Village Hall, a village local to the site and the consultation materials were also available to view online at www.cruachanexpansion.com/unit-3-4-upgrade/.

1.2 Proposed Development

- 1.2.1 The application site ('the Site') is the existing Cruachan Power Station at Cruachan, Loch Awe, Argyll & Bute.
- 1.2.2 The proposal seeks to upgrade units three and four of the existing pumped storage hydro power station. The capacity of the individual units will increase from 100MW to 120MW. This brings the power station's total output to 480MW. A full set of information about the proposal can be found in Appendix 1, as presented at the public consultation event.
- 1.2.3 This project is separate to the Cruachan Expansion Project.

1.3 Purpose and Structure of this Report

- 1.3.1 This Statement provides a summary of the pre-application consultation (PAC) undertaken in respect of the Proposed Development. Whilst public consultation is not a statutory requirement for an application of this nature, it is encouraged as best practice. The applicant opted to host an in-person public exhibition and online consultation due to the high level of interest in and regard for Cruachan Power Station in the local area.
- 1.3.2 The purpose of the report is to reflect the information given in advance of the submission, the feedback received and how any suggestions were taken into account by the applicant.
- 1.3.3 Information will be presented through the following sections:
- Chapter 1: Introduction
 - Chapter 2: Consultation Approach
 - Chapter 3: Consultation Outcomes and Feedback
 - Chapter 4: Post Consultation Changes and Response

2 Consultation Approach

2.1 Introduction

- 2.1.1 This chapter outlines the process taken to consult the community and other relevant stakeholders.
- 2.1.2 The aim was to consult with residents, communities and interested parties, and gather feedback on the project prior to the submission of the Section 36 application to Scottish Ministers.

2.2 Notification of New Project Form & EIA Screening

- 2.2.1 The Notification of New Project Form was submitted to the Energy Consents Unit (ECU) in July 2022, generating project code ECU00004537.
- 2.2.2 An EIA Request for a Screening Opinion was submitted to the ECU in June 2022 and an Opinion confirming the proposal is not considered to be an EIA development was received in October 2022. This screening opinion can be found in Appendix 2.

2.3 Public Exhibition

- 2.3.1 A public exhibition took place on Wednesday the 14th of September 2022 (2pm – 6:30pm) at Taynuilt Village Hall. Members of both DRAX Group and Stantec were present to allow attendees to discuss their thoughts on the project and ask any questions directly to members of the project team.
- 2.3.2 One public exhibition was held for this project. A suitable time and date, and accessible location were chosen to encourage optimum participation.

Online

- 2.3.3 The information boards shown at the exhibition, found in Appendix 1, were also available to view on the project website, www.cruachanexpansion.com, from the 13th of September 2022. A form for public comments and feedback was available and remained open for three weeks, until the 5th of October 2022. The website and form made clear that public comments sent to the applicant are not representations to Scottish Ministers, with inclusion of the following statement:

Please note, comments made to the applicant are not representations to the Scottish Ministers. When the applicant submits an application, there will be opportunity to make representations on that application to the Scottish Ministers.

- 2.3.4 The consultation material currently remains available to view on the project website and although the formal period for comments closed on 5th October 2022, members of the public and stakeholders can contact the project team about the proposals using the project email address cruachanupgrade@stantec.com.

Exhibition Materials

- 2.3.5 The exhibition provided five boards presenting key information about the project, as summarised below.
- Board 1 – This board offers a welcome note as well as an introduction to the project, with information on the background of the power station and rationale for the proposal.

- Board 2 – This board outlines the necessary works to be carried out during construction, as well as how the existing Cruachan operation will be impacted. This board also outlined the project stages and its operational lifespan.
- Board 3 – This board highlights the predicted impacts of the proposal.
- Board 4 – This board provides an annotated diagram of the unit, with information of its' weight and different parts.
- Board 5 – This board offers a timeline of the project from the initial screening request stage through to the final stage of full operation. This board also provides information about giving feedback on the exhibition and how to get in touch with any thoughts or queries.

Feedback

2.3.6 Feedback forms were available at the consultation to enable visitors to leave comments on the proposals. Paper copies were distributed at the exhibition to be completed at the event or a later date. There was a feedback form on the project website alongside the exhibition materials, which could be completed and submitted electronically. This was available to fill out between the 13th of September 2022 to 5th of October 2022.

2.3.7 A copy of the feedback form can be found in Appendix 3.

Attendance

2.3.8 The event was well attended by local residents and a local councillor.

Notification of Event

2.3.9 The event was advertised in the Oban Times on Thursday the 1st of September 2022. The advertisement can be found in Appendix 4.

2.3.10 Posters were put up around the local area advertising the event. This poster can be found in Appendix 5.

2.3.11 Community councils were invited to attend via email, such as:

- Taynuilt Community Council
- Glenorchy and Innishail Community Council
- Avich and Kilchrenan Community Council
- Oban Community Council
- Connel Community Council
- Inveraray Community Council

3 Consultation Outcomes and Feedback

3.1 Summary of Consultation

- 3.1.1 There were 10 attendees at the consultation event.
- 3.1.2 100% of respondents viewed the exhibition material, and 75% said their opinion had not changed since viewing this. 100% of respondents were in favour of the proposed works.

3.2 Respondent Profiles

- 3.2.1 All respondents were residents of the local area, living in either Taynuilt or Oban.

3.3 Feedback

- 3.3.1 The comments provided have been considered and reviewed across the final set of proposals.

Feedback Form Responses

- 3.3.2 The responses received verbally and in writing indicated a high level of support for the proposed development.

Support for the Proposed Development

- 3.3.3 100% of the respondents were in favour of the upgrade of units 3 & 4 in Cruachan Power Station. Positive comments received during the feedback are noted below:
 - “Will help towards climate targets and help employment in the area”
 - “Good to see an existing facility made more efficient”
 - “Good environmental reason to improve the power station and bring it up to date.”
 - “Should be minimum disruption as all work is done inside and out of sight.”
 - “Anything that gives us more power is very welcome”
- 3.3.4 No negative comments were made about the proposed upgrade works and no issues were raised.

4 Conclusion

- 4.1.1 Drax undertook voluntary public consultation to inform members of the public, stakeholders, and interest groups of the proposed works to upgrade units 3 and 4 at Cruachan Power Station. The consultation also gave opportunity for people to raise any concerns and have any questions answered about the proposed development.
- 4.1.2 The consultation event held in Taynuilt in September 2022 was attended by interested residents who all expressed support for the proposal. Attendees recognised that investment by Drax to upgrade Power Station would help to ensure the station remains viable and able to function efficiently to provide secure and reliable energy and the security of jobs associated with running the station.
- 4.1.3 The project website will continue to be updated when key milestones are reached including submission of the application and will advise the public how to make representations to Scottish Ministers regarding the application for Section 36 Consent. The project email address will remain active throughout the consenting process to ensure those interested in the project or with concerns can communicate with the project team and seek information about the proposed development.

Appendix 1 Consultation Boards

Cruachan: Proposed Upgrade of Units 3 & 4

Welcome

Drax is pleased to share the plans to replace and upgrade Units 3 & 4 at Cruachan Power Station ('The Hollow Mountain'). Drax is committed to enabling a zero carbon, lower cost energy future through engineering and innovation, and believe that these proposals present an opportunity to improve generation efficiency and increase power output with minimal impact on the environment and local communities.

Cruachan Power Station

Cruachan Power station opened in 1965, and was acquired by Drax in 2018. It is one of only four pumped storage hydro stations in the UK and currently has a capacity of 440MW – enough to power almost 500,000 homes.

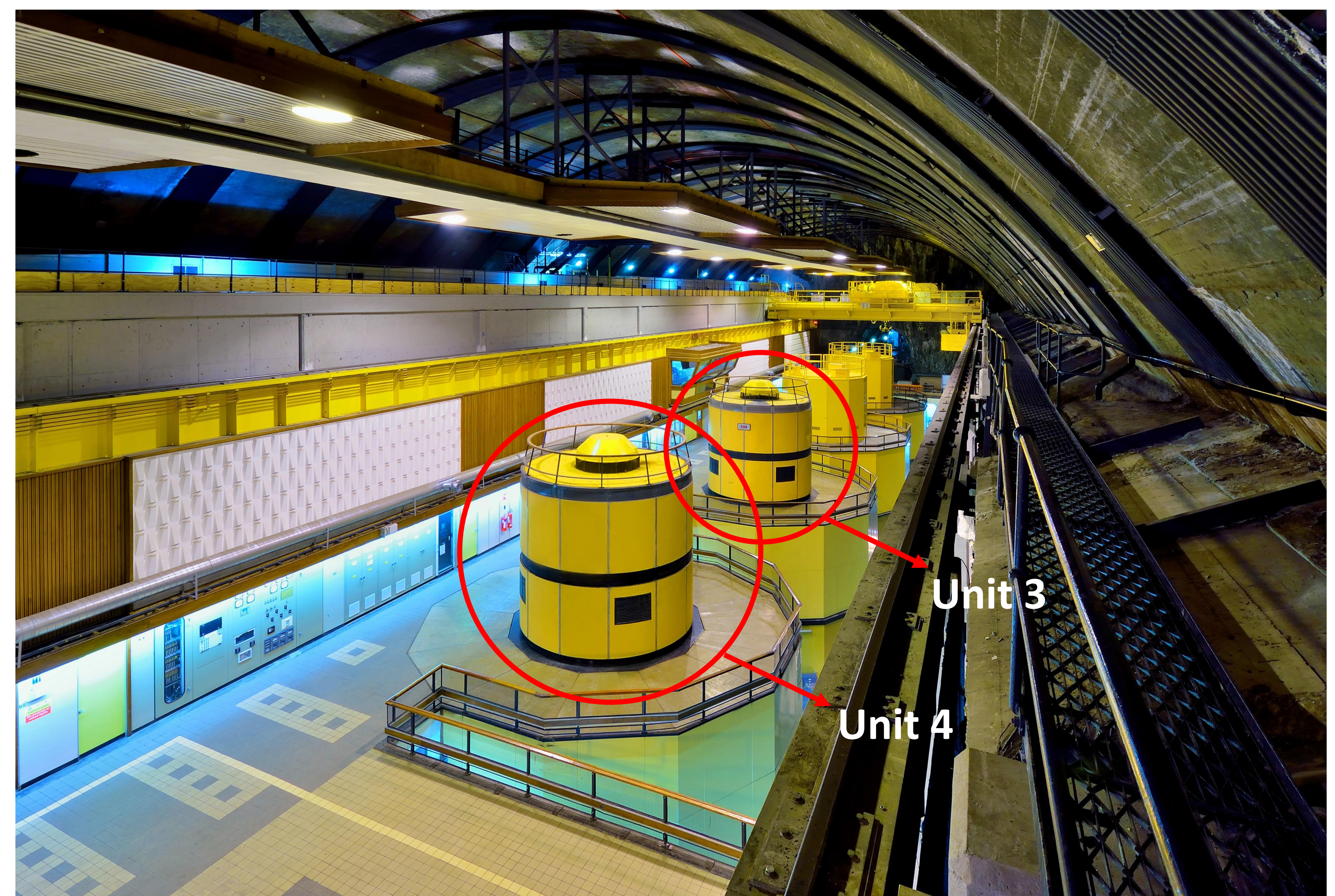
Project Background & Rationale

The original Cruachan Units were designed and constructed during the 1960s, and whilst some equipment has been replaced over the intervening years, other components are reaching the end of their operational lifespan.

Following an assessment of current operations at Cruachan, Drax has identified potential to improve operational efficiency of Units 3 & 4; the power output can be increased by 20%.

Replacing Units 3 & 4 will:

- increase power output.
- help ensure environmental improvements and other associated operational benefits.
- enable other renewable generation to connect to the electrical network.
- have limited visual change to the appearance of the Units within the machine hall, as existing plant housing will be retained.



Cruachan Power Station Machine Hall

Cruachan: Proposed Upgrade of Units 3 & 4

Works Required

The work includes the complete replacement of the generator, turbine impellor and other turbine components. All embedded parts of the Units will remain in situ but will be validated for future operation.

The work will require approximately 50 additional people on site at peak times during the assembly of the new Units.

The new Units will arrive in parts via the main access tunnel and will be assembled underground. All construction equipment required for the new Units and parts removed from the old Units will be transported out of the power station using the main access tunnel.

Impact on the Existing Cruachan Operation

During the build process Unit 3 and Unit 4 will have separate outage periods. Each outage will be for approximately 6 months, with Unit 3 out of service in 2026 and Unit 4 in 2027. Exact outage periods will be agreed with the appointed contractor.

Project Stages

- Environmental Impact Assessment (EIA) Screening Request submitted to Scottish Ministers in June 2022 with a response expected by October 2022. This will determine the supporting studies and information required to be submitted with the Section 36 Application. The application will then be prepared and submitted towards the end of 2022.
- Drax are in the process of tendering the design and construction work. Feedback from prospective contractors is due around December 2022.
- Design work for the new turbine impellor will take around 12-months, including construction and testing (using a scale model of the turbine).
- It is expected that manufacturing the turbine impellor will take around 24-months.
- The works will take place during 2026 and 2027.

Operational Lifespan

The upgraded Units will be designed to last for a 40-year period. At the end of this period, there will be some original parts that have reached 100-years of operational service – a testament to the original design and an ongoing schedule of maintenance.



drax

Cruachan: Proposed Upgrade of Units 3 & 4

Impacts

As a proposal to replace existing plant in-situ, impacts will be limited. The application will address the following topics:

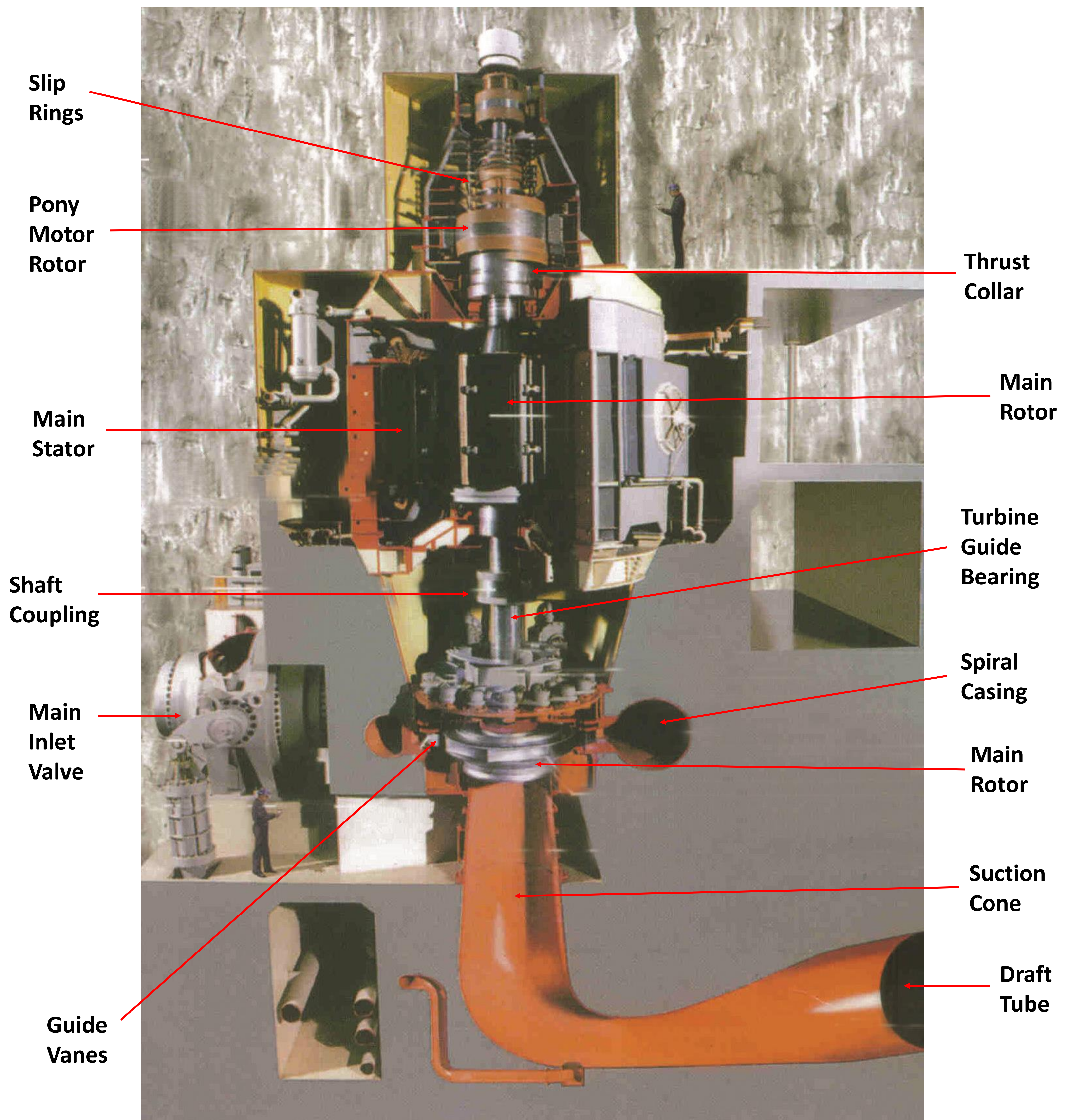
- **Construction noise:** there will be limited impact on the surrounding area as the work will be completed underground.
- **Traffic:** whilst there will be a small increase in traffic, the removal of the existing unit components and supply of new equipment will take place over several months and so a daily increase of traffic per day is relatively limited.
- **Increased activity:** there will be around 50 additional staff on-site at peak times during the build process, and where possible local recruitment will be prioritised.
- **Water management:** Cruachan Power Station has a very limited operational impact on the water level of Loch Awe. Water levels on Loch Awe are managed by Scottish and Southern Energy and Drax has an agreement in place in this regard.
- **Overhead lines:** the upgrade of Units 3 and 4 will not impact on the existing overhead lines and no new overhead lines are required as a result of the proposals.
- **Fisheries:** the installation may result in a change to the water flow between Cruachan Reservoir and Loch Awe (around 15%) and impact on fish populations in Loch Awe will be assessed.



Cruachan: Proposed Upgrade of Units 3 & 4

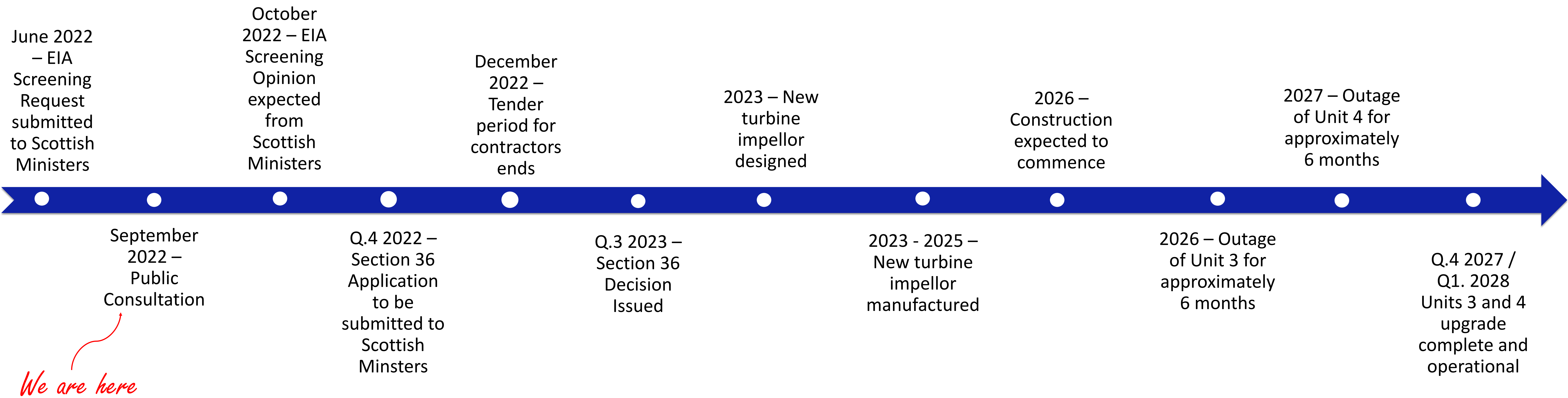
Inside the Units

Each unit weighs over 650 tonnes and houses many parts which all work together to generate electricity.



Cruachan: Proposed Upgrade of Units 3 & 4

Timeline



Feedback

Exhibitions are an important part of the development process, helping engage the local community and interested parties with proposals and work undertaken before an application is submitted to Scottish Ministers.

This exhibition is a chance for us to share our plans and is an opportunity to raise questions, concerns, ideas or comments that can be considered as part of the development process. Now that you’ve seen the initial proposal, we would be grateful if you can share your thoughts with us in any of the following ways:

Complete a Feedback Form Available from the team today	Email: cruachanupgrade@stantec.com
Writing to: Stantec, 5 th Floor, Lomond House, 9 George Square, Glasgow, G2 1DY	Comments should be submitted by: 5 th October 2022

All information is available on the project website: www.cruachanexpansion.com



Appendix 2 Screening Opinion

E: Victoria.Bonner@gov.scot

Lynsey Fraser
Stantec
Engineering Consultant
5th Floor,
9 George Square,
Glasgow,
Scotland,
G2 1DY

By email only to: Lynsey.Fraser@stantec.com
Our ref: ECU00004537
18 October 2022

Dear Lynsey Fraser,

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)

SCREENING OPINION OF THE SCOTTISH MINISTERS

IN RESPECT OF THE PROPOSED APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 TO UPGRADE GENERATORS THREE AND FOUR AT THE EXISTING CRUACHAN PUMPED HYDRO STORAGE POWER STATION, DALMALLY

Thank you for your request dated 29 June 2022 requesting, on behalf of Drax Power Ltd (“the Company”), prepared by Stantec UK Ltd, a screening opinion in respect of an application under section 36 of the Electricity Act 1989 (“the Electricity Act”) to upgrade generators three and four at the existing Cruachan Pumped Hydro Storage Power Station, located in Dalmally.

The proposed upgrade is to replace existing turbines three and four within the existing structures at Cruachan located at The Cruachan Power Station, Dalmally, Argyll and Bute, Scotland, PA33 1AN, within the planning authority area of Argyll and Bute Council (“the Planning Authority”).

The proposal requires to be screened by the Scottish Ministers in accordance with regulation 7 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (“the Regulations”). Following a request for a screening opinion made under regulation 8(1),

Scottish Ministers are required to adopt an opinion on whether the Development is or is not EIA development.

The screening application letter was accompanied by supporting documentation, which included a Site Layout map, details of the proposed Development and surroundings with a review of the environmental baseline and assessment of effects including:

- The size and design of the development;
- Cumulation with other existing development and/or approved development;
- The use of natural resources, in particular land, soil, water and biodiversity;
- The production of waste;
- Pollution and nuisances;
- The risk of major accidents and/or disasters which are relevant to the project concerned;
- Including those caused by climate change, in accordance with scientific knowledge;
- The risk to human health (for example due to water contamination or air pollution).

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

The Regulations set out at 8(2) the information that must accompany a request to the Scottish Ministers to adopt a screening opinion. Regulation 10 requires that the Scottish Ministers must seek that information if it is not included within the application documentation. Scottish Ministers consider the information included in the application letter and supporting documents is sufficient to meet the requirements set out in regulation 8(2), and that the submitted information has been compiled taking into account the selection criteria in schedule 3 of the Regulations.

Statutory Consultation

Under regulation 8(5) of the Regulations, Scottish Ministers are required to consult the planning authority within whose land the proposed application is situation. The Planning Authority was consulted and responded on 14 September 2022 advising that, in their view, the Proposed Development does not constitute EIA development. A copy of the Planning Authority's response is annexed to this screening opinion (**Annex A**).

In its response, the Planning Authority advised that, should an application be made to Scottish Ministers for the proposed upgrade, it would be required to be accompanied by supporting information in order to address matters including:

- Landscape and Visual Impact Assessment required for final layout including details of mitigation and cumulative impact;
- Full Noise Assessment;
- Flood Risk Assessment;
- Traffic Assessment;
- Ecological Impact Assessment, including relevant survey's;
- Biodiversity Surveys including implementation of appropriate wetland species;
- Comprehensive Landscape Plan;
- Archaeological/Cultural Watching Brief.

Please see attached the consultation response from the Planning Authority, which sets out the reasoning behind its conclusion that EIA would not be required for the proposed development.

Scottish Ministers' Considerations

EIA development is defined in the Regulations, in respect of an application, as a proposed development, which is either Schedule 1 development, or Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The proposed development constitutes Schedule 2 development in terms of the Regulations.

In adopting a screening opinion as to whether Schedule 2 development is EIA development, the Scottish Ministers must in all cases take into account such of the selection criteria in Schedule 3 of the Regulations as are relevant to the proposed development, and the available results of any assessment.

Scottish Ministers have taken the selection criteria in Schedule 3 and all of the information submitted in respect of the screening request in account, and have taken into account the views of the Planning Authority. Scottish Ministers adopt the opinion that **the proposal does not constitute EIA development and that any application submitted for this development does not require to be accompanied by an EIA report.**

In accordance with regulation 7(2), this opinion is accompanied by the following written statement with reference to the relevant selection criteria within Schedule 3 of the Regulations. In accordance with the Regulations, a copy of the screening opinion has been sent to the Planning Authority.

Written Statement

Characteristics of Development

In overview, the upgrade is to replace existing turbines three and four within the existing structures at Cruachan Pumped Hydro Storage Power Station. The new units will appear almost identical to the existing units, the only minor differences being the location of the auxiliary components such as coolers. The main changes to the turbine and generator are not visible, even within the powerhouse. They are contained within the generator housing or the turbine itself, all of which is underground. The new design of turbines three and four will enable a wider operating range and a level of 40-120 MW is planned.

The proposed Development lies in the existing Cruachan Pumped Hydro Storage Power Station, located in Dalmally, in Argyll & Bute. The surrounding area is mostly agricultural.

As a physical replacement of existing plant, cumulation of impact is insignificant. There is currently a separate proposal for the expansion of Cruachan with the Scottish Ministers Energy Consents Unit - ECU Reference ECU00004492. The expansion and upgrade proposal are separate, and this application is accompanied by a hydrological assessment to determine any

impacts upon Loch Awe, taking into account the revised discharge rates from both schemes when operational.

The Company state the flow of water through each turbine will increase, as the existing units have a design water discharge of 30m³/s when generating. The revised turbine discharge is still to be determined but will be around 36m³/s. There will be no change to the use of natural resources of land, soil, water or biodiversity as the proposed works do not require any new or additional land take.

The facility is expected to generate construction waste, decommissioning waste and operational waste when the turbine and generators reach end of life and require to be replaced and or recycled. Waste will include small amounts of chemical waste of oils and lubricants over lifetime of turbines.

The operation and upgrade of the proposed Development is not expected to give rise to pollution or nuisances therefore it would not present a significant risk to human health, and will be designed to comply with industry standards with no significant effects predicted. The Company note all proposed works are underground in existing pump hydro (PH) cavern, so are not expected to create nuisance. There is little pollution or nuisances anticipated, as the only discharge expected is clean water.

The proposed Development works are within the cavern, so the impact of flood risk will be within this context. A supporting Hydrological Assessment will be included with any submitted application to assess the flood risk associated with the proposed works, and SEPA will be consulted by Scottish Ministers on any application.

No major disasters are considered likely as a result of this replacement. The Company will be required to install and operate the proposed Development to all relevant safety standards to reduce this risk.

The risk to human health of water contamination or air pollution is not significant as the works are located underground in existing PH cavern. There will also be no significant pollution anticipated. However, there will be some emissions from traffic during construction and operation of the proposed Development.

Construction traffic would mainly consist of heavy goods vehicles (HGVs) and light commercial traffic. During the operational phase, traffic will be generally low as there is no permanent staff based at the site and visits will be for maintenance activity only. A Construction Traffic Management Plan is expected to be implemented to ensure traffic is managed and routed carefully, and Scottish Ministers will consult Transport Scotland.

Scottish Ministers consider that the proposed Development will not likely give rise to significant environmental impacts in respect of criteria listed above and is in agreement with the reasoning presented by the Company in the screening request submission.

Location of Development

The proposed upgrade site is located at the Cruachan Power Station, located in Dalmally, Argyll and Bute, Scotland, PA33 1AN. The area and surroundings is undeveloped and mostly agriculture. The site is located within the Argyll and Bute Council area. The area immediately surrounding the site is predominately-rural comprising primarily open agricultural land.

No additional natural resources would be required over and above what is currently used at the site. The proposed Development is located within a rural location, and will replace and add to existing approved use. No new land will be required and all works will take place in existing PH cavern, which is underground.

There is potential for migratory fish to be impacted during the operational phase of the proposed Development. The upstream migrating adult salmon and sea trout are likely to be attracted to the outfall during generation, downstream migrating smolts and European eels. This is likely to result in delays to migration or entrapment of fish within the underground waterway system, causing translocation, injury or mortality. Scottish Ministers will consult Marine Scotland and the relevant Fisheries Boards and require the Company to consider this in full in any submitted application, and ensure appropriate mitigation is adhered to.

The site is not located within any designated wetlands. The proposed Development is not relatively close to the coast as it is land-locked, and therefore; impacts are unlikely, as it does not lie within the coastal zone. Loch Awe is fresh water so not considered to have any impacts.

There will be no impact on mountain, forest areas or nature reserves around the site and there is no need for tree removal. Although the proposed Development would take place inside the mountain, it is all within PH cavern, and no mountain areas are expected to be disturbed and there will be no aboveground visibility.

The site falls within the classified or protected European national legislation sites of Glen Etive and Glen Fyne Special Protection Areas (SPA), Coille Leitire Site of Special Scientific Interest (SSSI) and Loch Etive Woods Special Area of Conservation (SAC). It is predicted there will be no impacts due to sub-terranean location. Scottish Ministers state the Company should provide information on potential impact and any mitigation required regarding this matter in any submission of an application.

The site does not fall within any densely populated areas. Cruachan is situated on the north bank of Loch Awe, 19 miles east of Oban on the A85.

The site is located within an A-Listed structure, however due to the upgrade and proposal the impact is expected to be limited. The new units will look identical to the existing units, and the only minor differences will be the location of auxiliary components such as coolers. The changes to the turbine and generator will not be visible, even within the powerhouse. Scottish Ministers will consult the Planning Authority and Historic Environment Scotland on this proposal, and will assess any potential impacts this could have on the A-Listed structure. A full Cultural and Heritage Survey should be submitted in support of any application.

Characteristics of the Potential Impact

The proposed Development is not likely to have a significant effect on designated sites, given its distance from both nationally and locally designated sites and location. However, there may be potential for effects as it is located within an A-Listed structure. The proposed Development is within a rural location.

The magnitude and nature of impact is very limited due to the location of the proposal being underground and replacing existing plant. The site was initially selected for having relatively low prominence from the surrounding area. Loch Awe is the third largest freshwater loch in Scotland with a surface area of 38.5 square kilometres. The volume of water is estimated at 1.2km³. With the upgrade of turbine, three and four generated for an hour at the discharge level of 36m³/ then Loch Awe would increase in level by approximately 1.1 mm assuming no other flows and a simple spread of volume.

There is potential for migratory fish to be impacted during the operational phase of the proposed Development. Upstream migrating adult salmon and sea trout, as well as downstream migrating smolts may be impacted. The Company will implement mitigation measures to help prevent impact such as fish being sucked into the pipes or stuck to the side of screens.

Once upgrade construction has finished and the site is in operation, it will continue to have a visual impact with the new energy related infrastructure. This visual impact will be permanent for the duration of construction and operation. Scottish Ministers request visual impacts be assessed in any submitted application.

Scottish Ministers do not anticipate any visual and landscape effects, as the Development will take place underground.

There will be traffic during the construction and decommissioning phases to deliver and remove equipment from Site. During operation, it is expected to have generally low traffic flows. A Construction Traffic Management Plan will be implemented during the construction phase, and Transport Scotland and the Planning Authority will be consulted on this.

There will be no cumulative impact by virtue of the proximity of the proposed Development with other energy related developments. Proposal to expand Cruachan PSH are under consideration, and are not likely to result in a significant additional or cumulative impact.

There are no impacts of a transboundary nature as this development falls only within the Argyll and Bute Council administrative and authority area.

The application should include details of an assessment carried out by the Company to determine the potential for any private water supplies and their catchments to be affected, as well as mitigation measures for any public or private water supply affect by the development from the start of construction throughout the operational period to the conclusion of decommissioning.

Scottish Ministers endorse the comment from the Planning Authority that appropriate environmental considerations and mitigation should accompany the application, as outlined

above. Continued engagement with the Planning Authority during the pre-application stage is strongly encouraged.

This screening opinion does not constitute pre-application advice, and is provided without prejudice to the assessment of any future application under 36 of the Electricity Act 1989.

Yours sincerely

Victoria Bonner

A member of the staff of the Scottish Government

Cc Argyll and Bute Council

18 October 2022

Our Ref. : 22/01424/SCREEN
Your Ref. : ECU:00004537

Contact: Mr D Moore
Direct Line: Redacted
e-mail address: Redacted

FAO: Victoria.Bonner@gov.scot

Dear Sirs,

Section 37 Screening Consultation
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Request for Screening Opinion Input by Argyll and Bute Council from the Scottish Ministers.

APPLICANT : Drax Power Ltd
PROPOSAL : Upgrade of Existing Generators
ADDRESS : Cruachan Power Station, Lochawe

I refer to your request for Environmental Impact Assessment screening consultation advice in relation to replacement of turbines 3 and 4 at Cruachan. For your general information, the Council and Historic Environment Scotland (HES) are also undertaking pre-application discussions with the applicants in respect of any necessary Listed Building Consents required for this work.

Details of the Proposals

The applicants have provided the following details in their screening report:

The proposal is to replace existing turbines 3 and 4 within the existing structures at Cruachan. The new units will appear almost identical to the existing units, the only minor differences being the location of auxiliary components such as coolers. The main changes to the turbine and generator are not visible, even within the powerhouse. They are contained within the generator housing or the turbine itself, all of which is underground.

As a physical replacement of existing plant, cumulation of impact is negligible. Separate proposals for the expansion of Cruachan are the subject of an application to Scottish Ministers (ECU reference ECU00004492). Whilst the two proposals are separate, the upgrade application is accompanied by a hydrological assessment to determine any impacts upon Loch Awe taking into account the revised discharge rates from both schemes when operational.

The screening submission provides detail and opinion in respect of the schedule 3 tests to be applied to the proposals. Having reviewed these submissions and having regard to the nature/scale and characteristics of the proposals the Planning Authority is in agreement that no EIA is considered necessary.

With regard to Schedule 3, Part 2(c)(viii) the Planning Authority is of the opinion that such matters, and the consideration of any historic or cultural significance can be properly addressed through the Planning Listed Buildings and Conservation Areas Act 1997 and do not require to be considered as part of an EIA.

Overall Conclusion

Given the above, the screening report submissions and the matters set out at Appendix A, The Planning Authority considers that an EIA is not required for this proposal.

Officers would emphasise that these views are without prejudice to the opinion of Members to any further consultation on the detail of the proposals as part of any potentially necessary Listed Building Consent application and should not be taken at this stage as reflecting any decision or stance to support or oppose the proposals.

Please do not hesitate to contact me should you wish further clarification in respect of any of the above matters.

Yours faithfully

David Moore

Senior Planning Officer
Major Applications Team
Helensburgh and Lomond

APPENDIX A

SCHEDULE 3 Regulation 7(2) - SELECTION CRITERIA FOR SCREENING SCHEDULE 2 DEVELOPMENT

Having determined that the proposals fall within Schedule 2 Part 2(a) relating to Energy Infrastructure the Council has undertaken an evaluation exercise against the criteria set out at Schedule 3 of the Regulations. For clarity, this exercise has been carried out by the Council as a consultee to the screening request sent to Scottish Ministers and therefore constitutes a clarification of the reasoning behind the consultation response view that no EIA is required, not a formal screening exercise.

1. Characteristics of development

The characteristics of development must be considered having regard, in particular, to—

- (a) the size and design of the development;
- (b) cumulation with other existing development and/or approved development;
- (c) the use of natural resources, in particular land, soil, water and biodiversity;
- (d) the production of waste;
- (e) pollution and nuisances;
- (f) the risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge;
- (g) the risks to human health (for example due to water contamination or air pollution).

The Planning authority is content that the proposal will not likely give rise to significant environmental impacts in respect of criteria (a) to (g) above and is in agreement with the reasoning presented by the applicant in the screening request submission.

2. Location of development

The environmental sensitivity of geographical areas likely to be affected by development must be considered having regard, in particular, to—

- (a) the existing and approved land use;
- (b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
- (c) the absorption capacity of the natural environment, paying particular attention to the following areas—
 - (i) wetlands, riparian areas, river mouths;
 - (ii) coastal zones and the marine environment;
 - (iii) mountain and forest areas;
 - (iv) nature reserves and parks;
 - (v) European sites and other areas classified or protected under national legislation;
 - (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
 - (vii) densely populated areas;
 - (viii) landscapes and sites of historical, cultural or archaeological significance.

The Planning authority is content that the proposal will not likely give rise to significant environmental impacts in respect of criteria (a) to (c)(viii) above and is in agreement with the reasoning presented by the applicant in the screening request submission.

In respect of Criteria c,(viii). It is not considered that the proposals will have any significant impact on any historical or cultural matters that cannot be properly addressed/evaluated through consideration of the proposals through any necessary Listed Building Consent (LBC) process. No formal determination has been made by the Planning Authority that LBC is required for these works, however ongoing discussions with HES and the Councils Conservation Officer ensure that potential historical/cultural issues can and will be adequately defined and considered through the Planning

Listed Buildings and Conservation Act requirements and therefore an EIA in respect of these matters is not considered to be required

3. Characteristics of the potential impact

The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(3), taking into account—

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- (b) the nature of the impact;
- (c) the transboundary nature of the impact;
- (d) the intensity and complexity of the impact;
- (e) the probability of the impact;
- (f) the expected onset, duration, frequency and reversibility of the impact;
- (g) the cumulation of the impact with the impact of other existing and/or approved development;
- (h) the possibility of effectively reducing the impact.

The Planning authority is content that the proposal will not likely give rise to significant environmental impacts in respect of criteria (a) to (h) above and is in agreement with the reasoning presented by the applicant in the screening request submission.

Overall Conclusion

Taking the above as a whole, it is not considered by the Council that the location, design or likely scale of works, nor duration of and characteristics of any impacts would require an EIA.

Appendix 3 Consultation Form



Cruachan Units 3 & 4 Upgrade Project Public Consultation Feedback Form

Please complete this form by 5th October 2022 to have your view taken into account in the Public Consultation. You can also complete this form and view all consultation material online at: www.cruachanexpansion.com/unit-3-4-upgrade/

We take your privacy seriously: Stantec UK Ltd, hosting this consultation on behalf of Drax Group is 100% compliant with the General Data Protection Regulation (GDPR). To learn more about how we collect, keep, and process your private information in compliance with GDPR, please view our privacy policy at: <https://www.stantec.com/en/copyright>.

Please provide your name

Please provide your postcode

Question 1 – Do you welcome the proposals for upgrading Units 3 & 4 in Cruachan Power Station? Please give reasons for your answer.

Question 2 – Did your opinion change after viewing the exhibition?

Yes ☐ No ☐

Question 3 – Do you have any comments about the proposed upgrade works that you wish to bring to our attention?

Question 4 – How did you find out about the project and public consultation? (Please tick)

Advert / Newspaper	
Word of Mouth	
Poster	
Website	
Social Media	

Once you have completed the form, please place it in the comments box or return it to a member of the Project Team. Alternatively, the form can be returned in the following ways:

Email: cruachanupgrade@stantec.com

Writing to: Stantec, 5th Floor, Lomond House, 9 George Square, Glasgow, G2 1DY

Website: www.cruachanexpansion.com/unit-3-4-upgrade/

Comments should be submitted by: 5th October 2022

Please note, comments made to the applicant are not representations to the Scottish Ministers. When the applicant submits an application, there will be opportunity to make representations on that application to the Scottish Ministers.

Appendix 4 The Oban Times Public Exhibition Notice

The Oban Times

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No 8630

Thursday 1 September, 2022

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Oban Games heavy weight Brian Robin honoured

INSIDE: Your bumper Holiday West Highland magazine AND Independent Schools feature

Speeding shoutout



Parents call for crackdown over safety fears

• See page 7 for more

Kilmore's iron lady



Alison brings home a bronze from Slovakia

• See back page for more



Oban and Lorn pipers take pride of place at Tattoo

Connel piper Emma Hill has been wowing crowds at the Edinburgh Tattoo as part of the military pipes and drums band, and, as well as meeting other musicians and military personnel from all over the world taking part in the Tattoo, Emma also met former Oban High School Pipe Band member Jamie Killorn, who is now serving with the 4th Battalion of The Highlanders of the Royal Regiment of Scotland (4 SCOTS). For the full story, turn to page 11.

PARENTS REMAIN ON HIGH ALERT

by Kathie Griffiths
kgriffiths@obantimes.co.uk

Parent groups who campaigned against cluster school proposals for Argyll and Bute are staying on high alert despite the plans being officially dropped.

Controversial plans for education changes, which would have seen executive head teachers in charge of school collectives, were discontinued at a meeting of the council's community services committee on Thursday August 25 after a three-hour debate.

Fears are now being expressed that the council could go 'underground' with the next round of proposed changes for schools and that people could lose their chance to have a say.

The community services committee (CSC) meeting did agree that work should continue to deliver improvement and address local and national challenges the education service is encountering.

More than 800 responses were given as part of a consultation exercise that generated huge debate and protests across communities, including parent councils and the region's largest teaching union, the Educational Institute of Scotland (EIS).

A report that went before the community services committee accused lobbying groups and teaching union the Educational Institute of Scotland (EIS) of spreading 'misinformation' about the Empowering Our Educators (EOE) plans, and of being 'disruptive' and detracting from the real focus of the consultation.

Dalmally Primary Parent Council (DPCC) was one of many groups that objected to the proposals and wanted clearer and better engagement as part of the consultation that cost Argyll and Bute Council £25,000 to market.

The council's policy lead for education Councillor Yvonne McNeilly has called for the authority to move forward but says the need for school

Continued on page 4.



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**TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997
PLANNING (LISTED BUILDING AND CONSERVATION AREAS) (SCOTLAND) ACT 1997**

The applications listed below, along with plans and other documents submitted with them, may be examined online at <http://wam.highland.gov.uk>

Written comments should be made to the EPC at the contact details below within the time period indicated from the date of this notice. Anyone making a representation about this proposal should note that their letter or email will be disclosed to any individual or body who requests sight of representations in respect of this proposal.

Reference Number	Development	Address	Proposal Description
22/03032/PIP	Land 55M NW Of Casaelca, Upper Inverroy, Roy Bridge		Erection of house
22/03631/FUL	15 Lovat Road, Kinlochmore Kinlochleven, PH50 4RQ		Siting of pod (holiday letting use)
22/03479/MSC	Land 400M NE Of Bjar Mhor Industrial Estate, Lochside, Fort William		Erection of 122 residential units with associated works (Phase 1)
22/03498/PIP	Land 50M SW Of Millburn Cottage, Arisaig		Erection of house
22/01436/FUL	Woodside House, Glenanross Morar, Mallaig, PH40 4PD		Proposed holiday cabin
22/03561/FUL	Land At Hill View Croft, Banavie, Fort William, PH33 7PB		Erection of house
22/03602/FUL	Land 180M North East Of Glasnacardoch Lodge, Mallaig		Erection of house
22/03554/FUL	Conival, Arisaig PH39 4NJ		Erection of extensions to house and erection of chalet

Time period for comments is 14 days from the date of this notice
ePlanning Centre, The Highland Council, Glenurquhart Road, INVERNESS IV3 5NX
Email: eplanning@highland.gov.uk

Public Exhibition: Cruachan Power Station Generators 3 & 4 Replacement

Date: Wednesday 14th September

Location: Taynuilt Village Hall, Taynuilt, PA35 1JH

DRAX Group propose to upgrade generators three and four at the existing Cruachan pumped hydro storage power station at Cruachan, Loch Awe, Argyll & Bute.

We are holding a public exhibition to provide local residents, communities and interested parties with the opportunity to view the proposals, ask questions and leave feedback prior to submission of an application to Scottish Ministers for determination.

We are holding the public exhibition in Taynuilt Village Hall on Wednesday 14th September 2022 between 2pm and 6.30pm.

Copies of the exhibition boards and other consultation information will also be available for viewing and download via the website www.cruachanexpansion.com from 13th September. The closing date for receipt of comments and feedback will be 5th October.

Please note comments made to the applicant are not representations to the Scottish Ministers. When the applicant submits an application, there will be an opportunity to make representations on that application to the Scottish Ministers.

For questions about the project please contact:
Email: cruachanupgrade@stantec.com
Telephone: 0141 352 2360
Address: Stantec UK Ltd
9 George Square,
Glasgow,
G2 1DY

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Argyll and Bute Council

PLANNING

The applications listed below together with the plans and other documents submitted with them may be viewed electronically through Argyll and Bute Council website at www.argyll-bute.gov.uk. Having regard to Schedule 6, Part 3, s10 of the Coronavirus (Scotland) Act 2020, documents are only available to inspect electronically at this time. Customers requiring assistance can contact us by e-mail: planning.hq@argyll-bute.gov.uk or tel. 01546 605518.

TOWN AND COUNTRY PLANNING DEVELOPMENT MANAGEMENT PROCEDURE (SCOTLAND) REGULATIONS 2013 REGULATION 20(1) ADVERT STATEMENT TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997 (AS AMENDED), RELATED PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) (SCOTLAND) ACT 1997

Ref. No.	Proposal	Site Address
22/00782/PP	To construct and operate a 132/275 kilovolt (kV) GIS substation and associated infrastructure that will connect the existing 132 kV overhead line (OHL) from Taynuilt to Inveraray to a proposed 275 kV OHL to Dalnally. The works will comprise cut and fill to tie the platform into the existing ground level, landscaping, Sustainable Drainage Systems (SuDS) basins, new permanent access and upgrades to existing tracks.	Land Approximately 2.5 Km South West Of Cladich, Argyll And Bute
22/01339/PP	Erection of 3 Dwellinghouses and installation of sewage treatment plant	Land South West Of Monadhbeg Houses, Dervaig, Isle Of Mull, Argyll And Bute
22/01491/PPP	Site for the erection of 20 apartments and formation of 2 vehicular accesses	Land South Of Annait, Taynuilt, Argyll And Bute
22/01479/PP	Partial demolition and change of use of former cafe to form office and store	Former Sea Life Centre Café, Barcalidine, Oban, Argyll And Bute, PA37 1SE

Written comments can be submitted online <http://www.argyll-bute.gov.uk/planning-and-environment/find-and-comment-planning-applications> or to Argyll and Bute Council, Development Management, Kilmorey Castle, Lochgilphead, Argyll, PA31 8RT within 21 days of this advert. Please quote the reference number in any correspondence. Any letter of representation the Council receives is considered a public document and will be published on our website. Anonymous or marked confidential correspondence will not be considered. A weekly list of all applications can be viewed on the Councils website. Customers are requested to use electronic communication where possible during the coronavirus pandemic as our ability to process postal mail is restricted.

To find out more about living and working in Argyll & Bute visit us at: www.argyll-bute.gov.uk
Comhairle Earra – Ghàidheal agus Bhòid

FIRST REGISTRATION OF A CROFT

Catherine Rhona Purdie has registered their croft 25 Airds Bay, Ardchattan & Muckairn Parish on the Crofting Register held by the Registers of Scotland. Any person who wishes to challenge the registration may apply to the Scottish Land Court by 29th March 2022.

Details of the registration can be found at www.crofts.ros.gov.uk/register/home. The croft registration number is C8576.

CROFTING COMMISSION COIMISEAN NA CROITEARACHD DECROFTING DIRECTION ISSUED

1. C Purdy, Ardtoe, 164 Kentra, 0.106 ha, Croft House Site & Garden Ground, with fencing conditions (114362)

Full details at www.crofting.scotland.gov.uk

FIRST REGISTRATION OF A CROFT

Mrs M H Cameron has registered their croft 2 Pottie, Kilfinichen & Kilvickeon on the Crofting Register held by the Registers of Scotland. Any person who wishes to challenge the registration may apply to the Scottish Land Court by 08 May 2022.

Details of the registration can be found at www.crofts.ros.gov.uk/register/home. The croft registration number is C8596

FIRST REGISTRATION OF A CROFT

Mrs Catherine Duffy has registered their croft, Cuin croft, Cuin and Dervaig, Kilninian and Kilmore/C8625 on the Crofting Register held by the Registers of Scotland. Any person who wishes to challenge the registration may apply to the Scottish Land Court by the 23rd May 2023.

Details of the registration can be found at www.crofts.ros.gov.uk/register/home. The croft registration number is C8625

RECRUITMENT

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We are seeking Affordable Warmth Advisors to join our team.

The role will involve providing advice and support to householders to help save energy at home and reduce energy costs.

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Details see <https://www.alienergy.org.uk/about/vacancies/>

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Appendix 5 Public Exhibition Poster

Public Exhibition

Cruachan Power Station

Units 3 & 4 Upgrade

drax



Drax is proposing to upgrade Units 3 and 4 at Cruachan Power Station.

Drax is committed to enabling a zero carbon, lower cost energy future through engineering and innovation, and believe that these proposals present an opportunity to both improve generation efficiency and increase power output on two of the existing Units at Cruachan Power Station.

We are holding a public exhibition in order to provide the local community and interested parties the opportunity to view the proposals, ask questions and leave feedback.

Copies of the exhibition boards will be available for viewing and download via the project website from 13th September:

www.cruachanexpansion.com

For questions about the project please contact:

Email: cruachanupgrade@stantec.com

Telephone: 0141 352 2360

Address: Stantec UK Ltd
9 George Square, Glasgow, G2 1DY

Date: Wednesday 14th
September

Time: 2pm – 6.30pm

Location: Taynuilt Village Hall