

**From:** [Haslam, Susan](#)  
**To:** ["William Dickins"; Susan Macmillan](#)  
**Cc:** ["Corrina Mertens"; Scott, Russell; Conaghan, Margaret](#)  
**Subject:** Pre-commencement condition 1 for Glen Etive Hydro Schemes  
**Date:** 10 June 2019 12:42:46

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William, Susan

Good to meet up last week and walk three of the sites. My comments are as follows:

**General comments**

- Our expectation is that all sites will be constructed in a way that ensured that they meet the requirements of the conditions outlined in the consents. If alternatives come forward then the full environmental effect of these needs to be assessed and it would need to be demonstrated that the alternative posed a similar or lower environmental risk than what has already been agreed.
- The penstock working corridor (ie both sides) needs to be marked out, not just the central line. This is needed to ensure that the 20 m corridor is observed and impacts are minimised. A similar approach needs to be taken with other temporary works such as borrow pits, laydown areas and construction compounds.
- Watercourses should be reformed over the top of the restored penstock route – they must not be culverted underneath.
- In areas of cutting, where the temporary track will eventually be “pulled” back over the penstock route as part of final restoration then we would be content for the penstock route to be only partially restored until this takes place. The style of partial restoration should minimise the potential for silt run-off as much as possible.
- Good turfs are going to be limited. All of them must be reused – and the sooner the better.

**Allt Chaorainn**

- It was disappointing that much of the discussions at this site concentrated around the contractors views that it was not technically possible to construct the site in line with the conditions outlined in the consent. This shows the importance of including construction contractors in the planning process and employing a contractor who can meet the requirement of the consent. It's clear William that you need to discuss method of construction further with this contractor.
- If required we would consider alternative working arrangements if clearly justified and shown to adequately protect the water environment and not reduce the likelihood of good restoration. To be clear leaving all the penstock open for the duration of the works is not an option. A phased approach – with different conditions/requirements in different areas - may be acceptable. However it did seem that the most environmentally risky works (on the hill corner about 100 m below the intakes – NN 19888 50194) are located where bedrock is located and works will be slowest. If there was to be a trade-off then length of unrestored penstock open at one time is probably more important to SEPA than length of time open (although I would imagine it would be the direct opposite from SNH).
- Further investigation is required relating to the extent of rock that will need to be excavated before detailed layout designs and timing can be agreed. We would want to see cross sections to show the extent of excavations required to get the corridor around the hill corner referred to above.
- We would be supportive of the proposal to using the pipe bridge to form a temporary access bridge at the top of the site and for a single machine to do the works between the intakes, with only the need for a single fording.

- The location of the intakes, especially the intake to the west, is in a very confined gorge area – detailed plans should be included to show the extent of excavations required to access and work in these areas.
- Of the three sites we visited, this one will need the most comprehensive package of plans and detailed drawings to enable us to support the discharge of the related conditions.

#### **Fhaolain**

- There is a requirement to avoid the M25 GWDTE at the powerhouse. This looks like it will be relatively easy to achieve as the deer fence marks the transition between the forest felling and M25 habitat. The tailrace will need to go through this area – which is fine – but excavations should be kept to a minimum. Any laydown or construction compounds in this area should be located as far away from the M25 (and river) as possible. Final submission should include clean plans showing proposals.
- We would be likely to be supportive of any proposal to move the penstock further away from the river and to within the same corridor as the access track. If this is the case the penstock would need to ascend the bank that the existing forest track is located on top of and it should do that at a location that is as far away as possible from the river and over as short a length as is practical.
- The main in-take area will be very “busy” and it is confined with very limited flat space. This will therefore be a very high risk area from a pollution prevention perspective. Finalised plans should show the extent of excavations required in this area, for example the extend of bank re-profiling required to provide a working area for construction.
- There were some discussions regarding the method of constructing the dam (half-and-half with coffer dams or complete river diversion). We would wish the construction method used to minimise potential impacts on the water environment as much as possible and suggest that advice is taken from our local operations team on this (Russell and Margaret copied in)

#### **Gaoirean**

- We would want to see the penstock moving away from the side of the river at the intake more rapidly than is currently shown on the site plan; the soon it is > 10 m from the river the better. Based on the local topography it looked like this would be easy to achieve and would slightly reduce the length of the penstock.

I hope the above is helpful and as always happy to discuss further,  
Kind regards

Susan

**Susan Haslam**

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*Please note I am not at work Friday afternoons*