



11 January 2019

SCOTTISH WATER

The Bridge
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www.scottishwater.co.uk
EIA@scottishwater.co.uk

Dear Mr McFadden

Red John Pumped Storage Hydro – EIA

Thank you for consulting with Scottish Water regarding the above proposed development. We have the following comments to make on this proposal:

Drinking Water Protected Areas (DWPAs)

The proposed site falls within the drinking water catchments within which Scottish Water abstractions from Loch Duntelchaig, Loch Ashie and Loch Ness are located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. Loch Duntelchaig and Loch Ashie supply Inverness Water Treatment Works (WTW), Loch Ness supplies Invermoriston WTW. It is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number **0800 0778 778**.

Scottish Water deem the activity to be high risk and has concerns over the location of the proposed works within Loch Duntelchaig and Loch Ashie and the impact it could have on public drinking water supplies. The Loch Ashie and Loch Duntelchaig catchment areas will be altered as a result of the construction of the Red John headpond and the landscaping involved in that. If the existing drinking water catchments were reduced at all, it could decrease the raw water yield and necessitate increased pumping from Loch Ness under the planned Scottish Water scheme.

Scottish Water is currently progressing a capital project with the objective of delivering a supplementary supply to Loch Ashie WTW from Loch Ness. The project team have undergone a protracted consultation phase with associated re-design of the scheme over several years, in order to meet SEPA's expectations relating to the prevention of spread of aquatic Invasive Non-Native Species (INNS). The proposals associated with the Red John development could facilitate the spread. Therefore Scottish Water would like to seek assurance from the Red John developers that their system is closed, and working methods adhere to strict biosecurity protocols, so there is no potential for INNS to migrate to Loch Ashie via the Red John scheme.

We welcome that reference has been made to the Scottish Water response to the previous consultation.

The fact that this area is located within a drinking water catchment should be noted in future documentation. Also anyone working on site should be made aware of this during site inductions.

We would request further involvement at the more detailed design stages, to determine the most appropriate proposals and mitigation within the catchment to protect water quality and quantity.

We would also like to take the opportunity, to request that in advance of any works commencing on site, Scottish Water is notified at protectdwsources@scottishwater.co.uk. This will enable us to be aware of activities in the catchment and to determine if a site meeting would be appropriate and beneficial.

The Scottish Water project, 503103 Inverness & Nairn, includes for the construction of a 600mm diameter raw water pumping main that will traverse the proposed Red John pumped storage scheme site boundary. Preliminary discussions have taken place between our delivery partner, CWA and the Red John project designers, Aecom. The route of the proposed Scottish Water will need to be altered to avoid a potential clash with their construction works. Continued co-ordination is required between both project teams through the respective design and construction periods to avoid any further clashes.

There is a duty under the CDM regulations for both projects to co-ordinate the design and construction activities to avoid potential for harm.

If you have any questions relating to the above, please do not hesitate to contact me.

Yours sincerely

Jacqueline Tait
Regulatory Advisor – Sustainable Land Management

Red John Pumped Storage Scheme

Response to Scottish Water

Thank you for your response dated 11th January 2019. We have reviewed the consultation response and wish to provide the following further information.

Response on Potential for Impact on Drinking Water Protected Areas

We note the comments made by Scottish Water and wish to confirm that there will be no physical works within Loch Ashie or Loch Duntelchaig. However the EIA Report does recognise that there is the potential for adverse effects from the construction phase works to be undertaken in the proposed Headpond area which could indirectly impact these two Lochs, in addition to the Tailpond Inlet / Outlet works in Loch Ness.

Chapter 10 Water Environment and its associated Appendix 10.5 Outline Surface Water Management Plan (SWMP) recognise this and outline the mitigation measures to be implemented during the lifetime of the Development.

Therefore we propose the following:

- To update the SWMP to include a clear statement on the Drinking Water Protected Area (DrWPA) and ensure that construction signage clearly marks any drainage or surface water management areas within the Development site boundary;
- To update the SWMP to include a statement that the Contractor will work closely with Scottish Water on their proposed project 503103 Inverness to Nairn should timescales coincide. The Applicant's consultant continues to liaise with Scottish Water via the Caledonia Water Alliance (CWA) and recent correspondence has confirmed that there will be no temporal or spatial conflict between the Development and their proposed project. A project update meeting is due to be held in the next few weeks; and
- To update the Construction Environmental Management Plan (CEMP) to include Scottish Water as a key member of the Project Liaison Group.

If Scottish Water are happy for these additional points to be added, please let us know and we will revise the documents accordingly.

Chapter 10 conclusions that the implementation of mitigation measures outlined in the Chapter and SWMP will not result in unacceptable adverse effects.

Response on Potential for Transfer of Invasive Species

The Applicant has liaised extensively with Scottish Environment Protection Agency (SEPA) and Scottish Natural Heritage (SNH) regarding the issue of invasive non-native species (INNS) and the potential for transfer of INNS between catchments. Section 3.4 of Chapter 3 Design Evolution and Alternatives outlines the design evolution of the Development, and how design changes have been informed by the presence of invasive species within Loch Ness. The implementation of the "closed loop system" is outlined here and in more detail of how the Development mitigates operational cross-catchment transfer are available in Section 6: Operation Risk INNS Assessment of Volume 5, Appendix 7.2: Invasive Non-native Species Risk Assessment of the EIA Report.

On the 2 October 2018, SNH confirmed that the INNS Risk Assessment addressed their concerns over INNS. SEPA also confirmed that were content with the INNS Risk Assessment within their Gate Check Response on the 2 October 2018.

During construction, the risk of INNS transfer will be minimised through the adoption of a Biosecurity Management Plan (BMP). An outline plan is presented within the Outline CEMP available in Volume 5, Appendix 3.1 of the EIA Report.