

Loch Kemp Storage - EIA Report

Appendix 5.5: Further Consultation with Consultees

November 2023

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Appendix 5.5: Further Consultation

Consultee	Date	Summary of Engagement
SSE Renewables	15 th October 2021	Contact was made with SSE Renewables in relation to sharing hydrological data. Communication with SSE Renewables is ongoing and the Applicant signed a Non-disclosure Agreement (NDA) at end of September 2023 to allow for sensitive information to be shared between the parties.
SEPA	24 th November 2021	Following an introductory meeting on 9 th November 2021, SEPA provided some initial (pre-Scoping advice) on the Proposed Development.
NatureScot	25 th November 2021	NatureScot provided some initial (pre-scoping) advice regarding the designated sites which could be affected by the Proposed Development, including the Ness Woods SAC, Easter Ness Forest SSSI, River Moriston SAC and Loch Ness, Knockie Lochs and nearby Lochs SPA and Knockie Loch SSSI. The Applicant provided responses to these initial comments on the 7 th December 2021.
ECU	1 st December 2021	Following an introductory meeting on 1 st December 2021, ECU provided some initial information for the Proposed Development. This included a suggested list of community councils or other parties which may be interested or affected by the Proposed Development. ECU confirmed that a PLHRA will usually be required as part of the EIA Report, unless it can be demonstrated beyond doubt that one is not required in this case.
Robertson Trust	18 th February 2022	The Applicant contacted the Robertson Trust in relation to opportunities for the Proposed Development to provide job and apprenticeship opportunities.
University of Highlands and Islands	28 th February 2022	The Applicant contacted the University of Highlands and Islands in relation to opportunities for the Proposed Development to provide job and apprenticeship opportunities.
NatureScot	24 th March 2022	Following an introductory meeting on 24 th March 2022, NatureScot provided their internal European sites casework guidance (via email).

NatureScot	10 th May 2022	<p>A site visit conducted by NatureScot, was undertaken on 27th April 2022. Feedback was provided via a memorandum dated 10th May 2022, which in summary included:</p> <ul style="list-style-type: none"> Confirmation that most of the woodland within the Ness Woods SAC within the site boundary corresponds to Old sessile oak woods with Ilex and Blechnum in the British Isles. The main areas of Tilio-Acerion forests of slopes, screes and ravines were identified in the immediate vicinity of the ravines, especially the Allt an t'Sluichd, and also the unnamed burn draining from the Lochan a' Choin Uire; and Comments and notes were provided for specific areas of interest, and a request made for detailing features of interest within the bryophyte and lichen reports.
Jacobite Cruises	25 th May 2022	Contact was made with Jacobite Cruises in relation to tourism and use of the powerhouse building as a visitor centre.
NatureScot	16 th June 2022	NatureScot provided information (via email) on assessing impacts on the Ness Woods SAC and preparing a suitable compensatory measures package.
SEPA	29 th June 2022	SEPA confirmed (via email) that information on the morphological impact of the Proposed Development on Loch Kemp, as requested in their Scoping Opinion is not required as part of the EIA Assessment.
FLS	4 rd July 2022	A call between the Applicant and FLS was undertaken to discuss the potential to coordinate an approach to improve the condition of the Ness Woods SAC and the FLS 'CAMAS' woodland area, located along the shoreline of Loch Ness, immediately north of the Dell Estate boundary. Discussions with FLS on this matter are ongoing.
FLS	7 th July 2022	Following the call on the 4 th July 2022, FLS provided further advice (via email) about how a collaborative approach to improving the condition of the Ness Woods SAC could be undertaken between FLS and Dell Estate.
SEPA	13 th July 2022	<p>Following the design workshop on the 24th May 2022, SEPA provided some written advise (via email), including:</p> <ul style="list-style-type: none"> That all works should be carried out at a suitable buffer from the top of the gullie / ravine / banks of the Allt a' Chinn Mhonaich, preferably at least 50 m; That the final version of the peat probing plans should show the extent of area that will be disturbed by construction and not just the final infrastructure;

		<ul style="list-style-type: none"> Highlighting several sections of access track that were located in deep peat and requested that these were rerouted away from these areas where feasible; and Noting that the east dam (Dam 3) would be located in very deep peat. SEPA advised that the Applicant will need to clearly justify why there needs to be infrastructure in this area and why the exact location is best in relation to peat disturbance. A wide set of peat probes were recommended for this area.
THC	10 th – 11 th August 2022	<p>On the 10th August 2022, the Applicant issued a letter (Ref: 120019-L-THC2-1.0.0) to THC (via email) regarding the pre-application advise from THC on impacts on trees. This letter advised that the Applicant intended to assess the impacts on commercial conifer forestry (including clear fell areas) within the forestry assessment in the EIA Report and impacts on the remaining woodland within the Site, including the woodland within the Ness Woods Special SAC, would be assessed within the terrestrial ecology assessment of the EIA Report.</p> <p>The letter confirmed that the Scottish Government's Control of Woodland Removal (CoWRP) policy would apply to any loss of woodland related to the Proposed Development, whether commercial conifer forestry, birch woodland or any other type of woodland.</p> <p>The Applicant stated that the recommendation for a Tree Survey to BS 5837:2012 requested in the pre-application advice is not necessary within the areas of commercial conifer forestry, where rotational felling and thinning operations are on-going. Instead, they propose to include a Woodland Management Plan covering the commercial conifer forestry which would identify areas of woodland impacted by the Proposed Development within the context of a 20-year Felling and Replanting Plan. This would include a Compensatory Planting and Maintenance Plan.</p> <p>Non-designated, non-commercial woodlands will be described according to Phase 1 Habitat and National Vegetation Classification and impacts assessed within the EIA Report. Impacts on designated woodlands within the Ness Woods SAC would be assessed as part of the EIA Report, and additionally within the Shadow HRA.</p> <p>THC confirmed on the 11th August 2022 (via email) that they agreed with the approach to assessing impacts on trees and woodland set out in letter Ref: 120019-L-THC2-1.0.0.</p>
Atlantic Salmon Trust	22 nd August 2023	Initial contact was made with Atlantic Salmon Trust to discuss latest developments on smolt mitigation.
THC	23 rd August 2022	<p>The Applicant contacted THC (via phone and email) regarding whether planting around the inundation area could be classified as compensatory planting (CP) under the CoWRP if undertaken pre-construction and pre-consent.</p> <p>THC confirmed that whilst technically the CP should not occur before consent is granted, they understood the benefit of undertaking this CP early, as it would be getting established when construction commences. In a situation like this, where the CP is specifically associated with</p>

		<p>a planning application that is yet to be made, THC confirmed that they would be more inclined to accept it, providing the commitment is made clearly in writing at this stage.</p> <p>THC requested that the Applicant provide a plan of the planting location and agree a planting mix and, maintenance schedule prior to the planting being undertaken.</p>
Ness DSFB	1 st September 2022	Initial contact was made with Ness DSFB to discuss possible impacts of the Proposed Development on smolt mitigation.
THC	23 rd – 26 th September 2022	<p>The Applicant contacted THC (via email) regarding a further query about the THC Pre-Application response where it states that an 'outline BNG Proposal' should accompany the application. The Applicant requested clarification from THC whether a full Biodiversity Net Gain (BNG) assessment that is run through a metric was required or if a more qualitative appraisal would be acceptable.</p> <p>THC responded (via email) on the 26th September 2022 and clarified that they would be looking for something similar to what has been done for the recent Beaully Substation Extension Application by SSEN, which looked at the biodiversity on the site, impacts of the Proposed Development on that biodiversity, and how the biodiversity loss on the site can be mitigated and an enhanced beyond the base level. They noted that this enhancement could be delivered through a habitat management plan.</p>
Ness DSFB	17 th October 2022	The Applicant discussed (via call) the feasibility of undertaking a smolt tracking study in Loch Ness with Ness DSFB.
THC EHO	21 st October 2022	<p>The Applicant wrote to the THC EHO (via email) to agree the methodology of the operational noise assessment and baseline noise monitoring locations.</p> <p>The email confirmed that measurements will be undertaken in accordance with procedures outlined in BS 4142:2014 and BS 7445-2:1991.</p>
THC EHO	2 nd November 2022	The THC EHO responded to the Applicant (via email) to confirm that they were happy with the proposed methodology of the operational noise assessment and baseline noise monitoring locations for the noise and vibration assessment, as set out in the Applicant's email on the 23 rd September 2022.
RSPB / Highland Raptor Study Group	9 th November 2022	In response to the RSPB's scoping response, the Applicant contacted the Highland Raptor Study Group to obtain data on breeding golden eagle, osprey, red kite and hen harrier. The Applicant requested this information within a 2 km buffer area from the Site.
THC	10 th November 2022	On the 10 th November 2022, the Applicant issued a letter (Ref: 120019-L-THC3-1.0.0) to THC (via email) on the LVIA. This letter followed on from the previous letter (Ref: 120019-L-THC1-0.1.0) issued on 25 th May 2022 (in response to the THC scoping response) and confirmed matters in respect of the LVIA (see Chapter 8: Landscape and Visual Impact Assessment).

THC	15 th November 2022	<p>On the 15th November 2022, the Applicant issued a letter THC (Ref: 428.V04707.00036) (via email) with the aim of agreeing a broad approach to biodiversity enhancement for the Proposed Development.</p> <p>In response to THC's email on the 26th September 2023, the letter highlighted that the approach taken by SSEN as part of their Beauly Substation Extension application involves applying a metric, and has been developed and applied internally by SSEN.</p> <p>The letter stated that the Applicant intends to provide a substantial package of ecological compensation measures and biodiversity enhancements for the Proposed Development. These measures would be detailed within the relevant chapters of the EIA Report, and in the case of compensation specifically relating to Ness Woods SAC, within a separate Compensation Package.</p> <p>Enhancement measures will first consider the opportunities for enhancement within the site but given the scale of the project and relatively limited opportunities within the site it is likely that off-site enhancements will also be required. Off-site enhancements would be undertaken within the wider Dell Estate where feasible. Enhancement works outside of Dell Estate may be required in the instance that suitable areas within Dell Estate cannot be identified.</p> <p>The letter requested that THC confirm whether the proposed approach is acceptable.</p> <p>THC responded (via email) on the same date with a request for the Applicant to bring forward an approach which would allow this to be quantified as part of the application process to allow THC to consider whether the provisions of the Proposed IMFLDP2 and those set out in NPF4 can be met. They clarified that this would not necessarily need to be a metric but some way of quantifying the losses and the gain, with the value of both being set out, would be required to demonstrate the proposals compliance with policy.</p>
THC	17 th November 2022	<p>THC responded (via email) to the Applicant's letter (Ref: 120019-L-THC3-1.0.0) and confirmed they consider the proposed viewpoint locations generally appropriate but advised that the Applicant should exercise caution when taking the photography to ensure that screening by vegetation or buildings is avoided. THC also requested two additional viewpoints from the Great Glen Way, in the vicinity of Portclair Forest, and at the end of the canal towpath in Fort Augustus.</p> <p>THC also requested Dunmaglas and Aberarder Wind Farms are included in the cumulative assessment if they are within the 10 km study area. They advised that although Red John PSH is outwith the study area, it would benefit from consideration in the cumulative assessment, particularly at elevated locations on the northwest of Loch Ness.</p>
THC	18 th November 2022	<p>The Applicant responded (via email) to the THC email regarding the proposed approach to biodiversity enhancement (Ref: 428.V04707.00036).</p> <p>The Applicant clarified that the loss of biodiversity as a result of the Proposed Development would be quantified within the EIA Report, by evaluating the importance of the habitats and species present, and quantifying the loss, including quantifying the area of the habitat types to be directly lost, and quantifying any habitat loss / degradation from indirect impacts. Habitat creation and restoration would then be</p>

		quantified within the EIA (and any subsequent Habitat Management Plan(s)), including the areas of habitats to be created and restored, and an evaluation of their value. The losses and gains would then be compared against one another such that what constitutes enhancement is clearly demonstrated.
THC	21 st November 2022	THC confirmed (via email) that they are content with the proposed approach to biodiversity enhancement set in letter Ref: 428.V04707.00036 and the further clarification issued by the Applicant on 18 th November 2023. THC added that they would be keen that the methodology for attributing weight to the importance of habitats and species present to be lost / gained is clearly set out in the methodology for the assessment.
NatureScot	6 th December 2022	The Applicant attended an in-person meeting with NatureScot. Following the meeting, NatureScot issued further advice (via email) on the following: <ul style="list-style-type: none"> Information on small losses of qualifying habitats that have been deemed to have no adverse effects on site integrity of Natura sites in the past; and Noted that the slivers of 'Mixed woodland on base rich soils' priority habitat that will be impacted by the Proposed Development weren't previously flagged. The NatureScot woodland ecologist has advised that the oak woodland feature can contain a variety of small pockets of more base rich woodland within it, which are part of the range of woodland subtypes that are still within the oak woodland feature.
NatureScot	7 th December 2022	NatureScot provided the Applicant with internal NatureScot guidance relevant to the habitat restoration proposals for the Ness Woods SAC.
NatureScot	12 th December 2022	NatureScot provided further information (via email) on assessing impacts on the Ness Woods SAC and preparing a suitable compensatory measures package.
RSPB / Highland Raptor Study Group	13 th December 2022	The Highland Raptor Study Group provided the ornithology data requested on 9 th November 2022.
SEPA	14 th December 2022	Following an update call on 14 th December 2022, SEPA provided written advice (via email), including that they: <ul style="list-style-type: none"> Requested that the final location of the northern track was moved slightly further south to avoid deep peat; Approved that the L-shaped dam (Dam 5) had been moved slightly to avoid the deepest peat;

		<ul style="list-style-type: none"> • Acknowledged that the peat probing info collected seems to show that it will not be possible to put in place the main east dam (Dam 3) without impacting on deep peat. Advised that the Applicant will need to demonstrate how disturbance has been minimised in relation to footprint; • Confirmed that the proposal to dispose of the disturbed peat in cells under the water line would not be acceptable as this would be classed as a waste disposal operation and would not make beneficial use of the material; • Advised that it would be helpful to understand further the extent of pier works now proposed, and to what extent they are temporary or permanent; • Advised that it would be helpful to understand more about the access track down to the loch and whether it is now designed so there are no excavation works within 50 m of the top of the ravine of the watercourse to the southwest; • Acknowledged that larger scale generation option (up to 600 MW) is to be pursued; • Have been advised by NS that there may be an issue with increased levels in Loch Ness as a result of the Proposed Development in conjunction with Red John. SEPA would be interested to learn more about this as it would potentially have an interest in relation to increased flood risk downstream; and • Advised that the Applicant will need to demonstrate how peat disturbance has been minimised in relation to footprint.
NatureScot	20 th - 31 st January 2023	NatureScot were consulted (via email) on the status of Fresh Water Pearl Mussel (FWPM) in the River Moriston and a licence to release historical data was signed. Historical survey efforts were conducted in 2003 and 2013, NatureScot stated that an additional survey effort would be required to inform updated population status within the river. It was proposed that three surveys would be conducted, two above the falls at Invermoriston and one at the mouth at Loch Ness, to place the population at the mouth into context of the entire population; NatureScot agreed this was an appropriate survey effort to inform the HRA. Survey methodologies followed the approved NatureScot method with the scope of works approved by NatureScot prior to conducting field surveys.
NatureScot	27 th February 2023	<p>Following the Applicant providing NatureScot on flow velocity models for the River Morison, NatureScot provided advice from their fish ecologist on the implications of the Proposed Development on the River Moriston SAC, including:</p> <ul style="list-style-type: none"> • Seeking out all available evidence for where the smolts travel in Loch Ness once they leave the mouth of the Moriston; • Assessing whether the modelled flows are likely to attract smolts and / or returning adult salmon; • Assessing the implications of these findings for the population of salmon in the SAC; and

		<ul style="list-style-type: none"> Additionally, although the focus is understandably on key periods of migration, as fish move throughout the year attention should also be paid to the likelihood of effects out with these key times.
Game and Wildlife Conservancy Trust	11 th April 2023	Initial contact was made with the Game and Wildlife Conservancy Trust to discuss impacts of the Proposed Development on smolt mitigation.
NatureScot	13 th April 2023	An early draft of the sections of this HRA report specifically relating to Ness Woods SAC was shared with NatureScot for comment, and feedback relating to evaluating the impacts on qualifying woodland habitats was given by NatureScot, in a meeting held on 13 th April 2023.
NatureScot	2 nd May 2023	<p>NatureScot provided additional comment (via) email on the draft Shadow HRA and Compensatory Measures Package for the Ness Woods SAC, including:</p> <ul style="list-style-type: none"> Commitment to controlling grazing pressure needs to include a target impact level, and monitoring to ensure that this is being achieved; and Monitoring should use the Woodland Herbivore Impact Assessment and aim for Low impacts.
THC	9 th May 2023	<p>On the 9th May 2023, the Applicant wrote to THC (via email) to confirm the visualisation locations and LVIA scope for the Proposed Development.</p> <p>The Applicant confirmed that they have endeavoured to include the two additional visualisations suggested by THC in their email on 17th November 2022. However, having now undertaken the baseline photography and further site investigation, it has been concluded that visibility from these two locations is too limited to be of use for inclusion as visualisations to THC and NatureScot standards.</p> <p>The Applicant confirmed that they would be happy to include a marked-up photograph pinpointing the location of the powerhouse in views from the canal towpath in Fort Augustus towards the powerhouse building, which would be seen at a considerable distance (over 10km) and at an oblique angle, making it barely perceptible.</p>
Scottish Forestry	10 th May 2023	A site visit with Scottish Forestry was undertaken on 10 th May 2023 with Scottish Forestry to assess compensatory planting proposals for the Proposed Development.

NatureScot	23 rd May 2023	<p>NatureScot's initial comments (via) email on the draft Derogation Report for the Ness Woods SAC:</p> <ul style="list-style-type: none"> • Noted the report was well structured to comply with the guidance; • Recommended including more evidence to demonstrate whether or not the alternatives considered will meet the project objectives / can be delivered; and • Recommended examining the effect of alternative designs on all the SAC conservation objectives that will be impacted, not just the extent of qualifying habitat that will be lost.
Scottish Forestry	10 th May 2023	The Client submitted a screening request to Scottish Forestry (via email) to determine whether the felling works required for the Proposed Development would require EIA consent under the Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017.
Scottish Forestry	7 th June 2023	<p>Scottish Forestry issued a letter (Ref: 030902580) that the felling works required for the Proposed Development would not require EIA consent under the Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017.</p> <p>Scottish Forestry confirmed that there are no sensitivities present on the site and there will be no negative impacts created, therefore no mitigation measures are required. They also confirmed that they considered the sites selected for the compensatory planting suitable for the proposals.</p> <p>Scottish Forestry stated that work in relation to this forestry project is expected to start within 5 years and be completed within 10 years from the date of this letter.</p>
NatureScot	20 th - 22 nd June 2023	A draft of the 'Eco-hydrological assessment of the impacts of Loch Kemp Storage on Urquhart Bay Wood SAC,' Report was provided to NatureScot for initial comment on 4 th May 2023. A meeting was held on 20 th June 2023, and follow-up meeting minutes and recommendations were provided by email on 22 nd June 2023.
THC	23 rd May 2023	<p>THC responded (via email) to the Applicant's email sent on the 9th May 2023 regarding the visualisation locations and LVIA scope for the Proposed Development.</p> <p>THC confirmed that they are content with the proposed VPs 1-6 being used as photomontages. THC agreed with the Applicant's findings regarding the two additional VPs requested by THC on 17th November 2022 and are content with these not being used for the full photomontages.</p>

THC	21 st June 2023	The Applicant issued a summary (via email) of the compensatory planting, including a planting plan. THC were asked to confirm if, based on this information, the planting around the inundation area could be classified as CP under the CoWRP if undertaken pre-construction and pre-consent, as agreed in principle on the 23 rd August 2022 (subject to additional information).
THC	3 rd July 2023	The Tree Officer at THC responded to the Applicant's email from 21 st June 2023 (via email). They stated that whilst the principle of early compensatory planting is welcome, NPF4 Policy 6 has changed the position in relation to development in ancient and / or native woodlands. Given the stronger protection now afforded to woodlands in NPF4 Policy 6, THC would be keen to see how the draft development layout has been revised to safeguard ancient and native woodland before commenting further on CP.
Scottish Canals	6 th July 2023	The Applicant issued the Outline Canal Management Plan (as detailed in Chapter 16: Traffic, Access and Transport) to Scottish Canals for comment.
Community Housing Trust	12 th July 2023	Contact with the Community Housing Trust was made in relation to housing provisions.
Red John PSH (relating to the THC Scoping Response)	25 th - 26 th July	In their scoping response, THC requested that the operator of Red John PSH should be contacted in relation to water management. The Applicant made contact with the Developer of Red John PSH (via phone and email) with SSE Renewables (who own Foyers PSH) to request whether they could provide information on their agreement on their stop pumping level to inform the hydrological modelling for the Proposed Development. The Developer of Red John PSH responded (via email) the following day to confirm that they are unable to share this information due to their NDA with SSE Renewables.
THC	10 th August 2023	The Applicant responded to the THC Tree Officer (via email) on the 10 th August 2023 to advise that they would like to commence the implementation of the CP areas around the inundation area (through fencing) in Autumn 2023 and would be willing to commit to this CP regardless of whether the Proposed Development is ultimately consented. The Applicant highlighted that the proposed CP proposals would be required to address the requirements of the CoWRP regardless of whether or not the Proposed Development would impact ancient woodland and requested that these two issues are addressed separately.
NatureScot	15 th August 2023	The revised the 'Eco-hydrological assessment of the impacts of Loch Kemp Storage on Urquhart Bay Wood SAC,' was issued to NatureScot (via email) on 21 st July 2023.

		On the 15 th August 2023 NatureScot confirmed (via email) that they agreed with the conclusion of the 'Eco-hydrological assessment of the impacts of Loch Kemp Storage on Urquhart Bay Wood SAC,' Report that there will be no adverse effect on site integrity on Urquhart Bay Woods SAC from the Proposed Development.
NatureScot	16-17 th August 2023	The Applicant issued a 2 nd draft of the Shadow HRA for the Proposed Development to NatureScot (via email). NatureScot responded the following day stating that they would review the Shadow HRA week commencing the 25 th September 2023. This version of the report did not include an assessment on the potential impacts of the Proposed Development on the qualifying feature of the River Moriston SAC, as this assessment was still being completed at this time.
NatureScot	28 th August 2023	NatureScot advised that they are currently undertaking updated site condition monitoring for the Ness Woods SAC but will not be able to complete the overall condition assessment until spring 2024. However, they hope to be able to conclude the condition assessment for Easter Ness Forest SSSI (which contains Dell Estate's ground) within a couple of months and will prioritise analysis of results from Dell Estate's ground.
ECU	12 th September 2023	The ECU issued a letter to the Applicant (via email), stating that any Section 36 applications to be advertised in 2023 needed to be received no later than 20 th November 2023.
NatureScot	14 th September 2023	The Applicant issued a 2 nd draft of the Derogation Report, including the proposed Compensatory Measures Package for the Ness Woods SAC to NatureScot (via email). NatureScot responded stating that it would not be able to provide further comment on the Compensatory Measures Package until the 21 st November 2023.
THC	18 th September 2023	The Applicant's forestry consultant spoke with the THC Tree Officer (via phone) to discuss the implementation of the advanced CP areas around the proposed inundation area (through fencing) in Autumn 2023. Following this call the forestry consultant provided the tree officer with further information on the overall woodland removal and compensatory planting areas for the Proposed Development (via email).
Scottish Canals	25 th September 2023	The Applicant made contact with Scottish Canals to discuss the interface with the Caledonian Canal during construction phase of the Proposed Development.
Scottish Canals	27 th September 2023	Scottish Canals provided feedback (via email) on the draft Outline Canal Management Plan issued by the Applicant on the 6 th July 2023.

NatureScot	27 th September 2023	NatureScot provided further written feedback on the Shadow HRA.
NatureScot	5 th October 2023	The Applicant wrote to NatureScot (via email) to confirm that whilst they would endeavour to revise the draft Shadow HRA to accommodate NatureScot's comments provided on the 27 th September 2023, prior to submission, these changes would also require updates to the Compensatory Measures Package for the Ness Woods SAC. The Applicant also advised that they intended to submit the S36 Application before 21 st November 2023 when NatureScot had stated that they would provide commentary on the Derogation Report. The Applicant therefore requested that NatureScot withheld from providing further comments on the Derogation Report, including the proposed Compensatory Measures Package for the Ness Woods SAC. NatureScot acknowledged this request (via email).
Scottish Canals	10-11 th October 2023,	Scottish Canals contacted the Applicant (via email) to request an update on the EIA Report preparation and the anticipated timescales for preparation / delivery. They also asked if the Applicant could advise on the consultation strategy, in particular to addressing issues raised by Scottish Canals, and similar issues raised by multiple consultees would be addressed. The Applicant responded to these queries on the 11 th October 2023 (via email).