Anderson, Catherine

From:	Laura Stewart - Planning <Laura.Stewart2@highland.gov.uk>
Sent:	Tuesday, March 5, 2019 9:32 AM
To:	Anderson, Catherine
Cc:	David Mudie
Subject:	Red John Pumped Hydro Scheme - Landscape Officer response
Attachments:	18_05427_S36_LandV.DOCX

Hi Catherine,

Please find attached the Landscape Officers comments on the scheme. She has kept this relatively short and highlighted our main concerns over the landscape and visual impact. We are seeking mitigation to be demonstrated as highlighted in the response. As we have previously discussed our main concern relates to landscape and visual impacts. We would be grateful if the comments can be taken on board and new information submitted as necessary.

We are particularly concerned about the visual impacts of the embankment, the significant sky lining of the intake structure and the current proposed road geometry.

We also have concern over the tailpond infrastructure and structures when viewed from the other side of Loch Ness. Is there anyway to reduce the scale of all buildings and indicate a design at this time which would help to assess how the buildings will sit within the landscape. At the shore, we would particularly be looking for the mass of any buildings to be well broken up to reduce the visual impact.

Kind Regards
Laura

Laura Stewart
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Development and Infrastructure
Town House, Inverness, IV1 1JJ
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The Highland Council
Comhairle na Gàidhealtachd

LANDSCAPE OFFICER - Consultation Response

Application Name	Red John Hydro
Planning Reference	18/05427/S36
Planning Case Officer	Laura Stewart
Date of Response	28/02/2018

Response

There are a number of aspects of the design which, as currently presented, create unacceptable impacts on the landscape and visual resource of the local area. There do, however, appear to be opportunities to create further embedded amelioration which might overcome these issues.

Main design issues relating to Landscape and Visual Impacts:

Embankment:

- Geometric form:
  - Level crest, emphasised by 'kerb' and Wave wall - contrasts with the natural skylines of the area, drawing attention and emphasising bulk of the artificial form. The wave-wall is likely to be obscured from the majority of vantage points, but the 'kerb' structure appears to be of similar scale and positioned more prominently on the outward edge of the embankment crest
  - Consistent outer gradient - which limits variation in light and shade cast on the slope and militates against natural variation in the grass-sward.

Existing proposed mitigation of landscape embankments will be effective, but are limited in their extent as they rely on masking the reservoir embankment. Too much of the embankment, and specifically, the crest is left potentially appearing overly and overtly artificial.

Potential further mitigation:. Amelioration of the slope geometry to develop a more complex slope with subtle variation in gradient and a more convex form could maximise the natural variation to appearance from light and vegetation changes. From viewpoints at lower elevations, a move convex slope would tend to obscure the level top to the embankment.

Successful mitigation of these effects would effectively reduce the impacts experienced at areas represented by viewpoints 1, 3, 8, 9 and 10

Structures on embankment

- Security fence-lines
  - Fencing is indicated to run along the toe of the embankment. Where the toe of the embankment is met by landscape embankments or backs onto forestry areas, this works well. However, where the toe of the embankment is in an elevated location at the south end of the reservoir, this lifts it into an unduly prominent location and from some vantage points appears sky-lined.

Potential further mitigation: Embedded mitigation may involve identifying a more subtle and appropriate fenceline, although this may require enclosing ground which is not part of the constructed embankment.

Successful mitigation of these effects would effectively reduce the impacts experienced at areas represented by viewpoints 5 and 6.

Main Intake Structure

- Prominence in landscape and views
    - Sky-lining
    - Scale in landscape

Existing proposed mitigation largely addresses effects of the building when back-clothed by rising ground. The breaking up facades with colour will not assist in skyline locations, where the structure will be backlit against a bright sky for much of the time, tending to create a silhouette form

Potential further mitigation: Amelioration of the slope geometry may assist in mitigating appearance of intake structure building. As sky-lining is apparent only from viewpoints at a lower elevation, such mitigation may be achieved by creating a convex, rather than straight slope.

Successful mitigation of these effects would effectively reduce the impacts experienced at areas represented by viewpoints 1, 3, 8, 9 and 10

Battery House and Sub-station

- Prominence in landscape and views
    - Scale in landscape
    - Appropriateness of design

While the ES suggest the Battery House building would be designed and clad in the style of agricultural sheds in the area, the scale and proportions of the building are sufficiently at odds with that form that it is not be appropriate.

Potential further mitigation: Other avenues of embedded mitigation should be explored, such as screening by sensitive earthworks and development of green roof.

Substation detail should also consider surfacing material design, from elevated viewpoints the pale surfacing such as used at Knocknagael would be prominent visually and draw attention.

Successful mitigation of these effects would effectively reduce the impacts experienced at areas represented by viewpoints 2,3, 7, 8, and 10.

Realigned Road

- Landscape Fit
    - While the EIS states that the road alignment has been designed to minimise both visual intrusion and earthworks, the visualisations from elevated viewpoints across the loch illustrate a readily identifiable horizontal line in the landscape.
    - This line runs parallel to the crest-line of the embankment. Echoing of the line serves to emphasise the edges of both structures and by defining the upper and lower extents of the embankment face, also emphasises the embankment's geometric simplicity, further setting it apart from the receiving landscape.

Existing proposed mitigation: development of woodland will reduce this impact over time, but there remains potential for it to be re-emphasised in the future, if and when the productive natural woodland to the north west of the road is subject to clear felling.

The present proposal for the road to define the junction between different woodland types

may tend to highlight the road line in views across Loch Ness.

Potential further mitigation :The prominence of the road line could be ameliorated by extension of the proposed mixed natural woodland from the reservoir side of the road to the Loch Ness side. Consideration should also be given to varying the vertical geometry of the road, to minimise the echoing of the embankment crest.

Successful mitigation of these effects would effectively reduce the impacts experienced at areas represented by viewpoints 2, 7 and 10

While some parts of the LVIA tend to under-rate the value of landscapes and sensitivity of receptors, the general conclusions as to the significance/non-significance for viewpoints and on the landscape are sound.

Overall it seems that design could be pushed much further in creating embedded mitigation which may bring impacts within acceptable limits of significance.

Name	Anne Cowling		
Email	anne.cowling@highland.gov.uk	Phone	01463 702509 (direct dial)

Red John Pumped Storage Scheme

THC Landscape Officer Section 36 Response

Thank you for your response dated 28th February 2019 which was received on the 5th March 2019. The Applicant has reviewed the comments and wishes to provide the following response – we have broken the response down in to sections so that the Applicants response directly relates to the comments made by the Landscape Officer for ease of reference:

Landscape Officer Comments	Applicants Response

Embankment:
• Geometric form:
  • Level crest, emphasised by 'kerb' and Wave wall - contrasts with the natural skylines of the area, drawing attention and emphasising bulk of the artificial form. The wave-wall is likely to be obscured from the majority of vantage points, but the 'kerb' structure appears to be of similar scale and positioned more prominently on the outward edge of the embankment crest
  • Consistent outer gradient - which limits variation in light and shade cast on the slope and militates against natural variation in the grass-sward.
Existing proposed mitigation of landscape embankments will be effective, but are limited in their extent as they rely on masking the reservoir embankment. Too much of the embankment, and specifically, the crest is left potentially appearing overly and overtly artificial.
Potential further mitigation: Amelioration of the slope geometry to develop a more complex slope with subtle variation in gradient and a more convex form could maximise the natural variation to appearance from light and vegetation changes. From viewpoints at lower elevations, a move convex slope would tend to obscure the level top to the embankment.
Successful mitigation of these effects would effectively reduce the
	The embankment provides the inherent structural form to the Headpond. There are technical structural requirements which dictate the form and profile of the embankment to ensure the safe impoundment of water, which result in the more uniform profile exhibited. In order to meet the necessary safety requirements, changes to the slope geometry by way of introducing a more complex slope with subtle variations in gradient is not possible. Beyond the area of structural integrity, additional material can be placed to create these variations in gradient which has been achieved by the introduction of the landscape embankments. These areas can only be introduced where they don't impinge on the structural integrity of the embankment and consequently can't mask the upper sections of the embankment and embankment crest.
	Whilst larger vegetation (including trees) cannot be planted on the embankment slopes in order that their structural integrity is maintained and to not hinder safety inspections, planting does not need to be limited to a consistent grassland sward. Ericoids including heather and bilberry will be seeded which will add complexity to the appearance of the embankment, creating variation in the colour and texture. This information would be outlined in the finalised LEMP and secured by the appropriate planning condition.
	The kerb structure extending along the length of the embankment would be smaller than the wave wall providing a low upstand (600mm) along the outer edge of the embankment. This is unlikely to be legible from anywhere other than in close range views.

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Structures on embankment: • Security fence-lines: • Fencing is indicated to run along the toe of the embankment. Where the toe of the embankment is met by landscape embankments or backs onto forestry areas, this works well. However, where the toe of the embankment is in an elevated location at the south end of the reservoir, this lifts it into an unduly prominent location and from some vantage points appears sky-lined. Potential further mitigation: Embedded mitigation may involve identifying a more subtle and appropriate fenceline, although this may require enclosing ground which is not part of the constructed embankment. Successful mitigation of these effects would effectively reduce the impacts experienced at areas represented by viewpoints 5 and 6.	The fence line can be adjusted as part of the detail design to ensure that it doesn't appear sky-lined and follows a lower alignment particularly at the south end of the Headpond to reduce its relative prominence from some views. This design change could be secured through an appropriate Planning Condition and the Applicant welcomes the opportunity to discuss this.

Structures on embankment:
Main Intake Structure
• Prominence in landscape and views
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	The height and scale of the Intake Structure was designed to provide flexibility to the future operational requirements of the Development. This, however, will be rationalised during detailed design and the height and form of the structure will be reduced. This is a consistent commitment the Applicant has made to the Dores and Essich community council.
	Articulation of the building form (height, appearance and roofline) can also be achieved through detailed design with variation created in order to further reduce its apparent prominence in the landscape and views, particularly when seen against the skyline.
	These design changes could be secured through an appropriate Planning Condition.

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	There will be an opportunity during the detail design to further integrate these structures into the landscape and reduce their prominence by the careful design of localised earthworks and planting to assist in their screening. The height of the structures will also be rationalised during the detail design to ensure that the buildings are no larger than operationally required with the overall height of these structures reduced as much of the housed equipment can be constructed partially underground.
	These design changes could be secured through an appropriate Planning Condition.

Realigned Road
• Landscape Fit
  • While the EIS states that the road alignment has been designed to minimise both visual intrusion and earthworks, the visualisations from elevated viewpoints across the loch illustrate a readily identifiable horizontal line in the landscape.
  • This line runs parallel to the crest-line of the embankment. Echoing of the line serves to emphasise the edges of both structures and by defining the upper and lower extents of the
	The new alignment of the road will be subject to detailed design and further discussion and agreement with THC Highways Authority and a supporting Planning Condition. During this process the detailed landscape design of the road corridor will be carried out. The landscape design will seek to provide a small embankment / berm with a varied profile along sections of the western side of the road which would be planted with native tree planting. This would effectively screen large sections of the road from year 1 of operation until roadside vegetation has fully established. Vegetation to the west of the road would further soften the appearance of the landform. The realigned road would then appear much like the existing roads within the context of the landscape and similar views.
	Furthermore as part of the detail design for the Forestry Reinstatement Plan, a 10m buffer

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Red John Pumped Storage Scheme

THC Landscape Officer Section 36 Response

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Summary of comments on 190318_THC Landscape Officer_ISSUED-AC Comment

Page: 1

Page: 1

Type: Highlight Author: annec Subject: Highlight Date: 20-Mar-19, 12:18:17 PM

Can they clarify the difference between being part of the embankment and being a thing that masks it? Essentially can they demonstrate reason why the bank has to be the very shape it is and no other?

Page: 1

Type: Highlight Author: annec Subject: Highlight Date: 20-Mar-19, 12:20:03 PM

Page: 1

Type: Highlight Author: annec Subject: Highlight Date: 20-Mar-19, 12:36:20 PM

That's good news and something I had not picked up from the documentation. I am curious as to how they are acceptable however given that trees would hinder inspection but these ground cover plant's wont?
That notwithstanding, a condition would be acceptable for this aspect

Page: 1

Type: Highlight Author: annec Subject: Highlight Date: 20-Mar-19, 12:16:02 PM

Can they point us to a source for these requirements to back up this view?

Page: 2

Page: 2

Type: Highlight Author: annec Subject: Highlight Date: 20-Mar-19, 12:38:45 PM

While the height and scale reductions and intention to articulate the building are all welcome, they don't provide sufficient assurance of the scale of mitigation achievable and dismiss without explanation to eh possibility of using the profile of the constructed landform to mitigate skylineing further.

Page: 2

Type: Highlight Author: annec Subject: Highlight Date: 20-Mar-19, 12:29:01 PM

A condition would be acceptable for this

Page: 3

Page: 3

Type: Highlight Author: annec Subject: Highlight Date: 20-Mar-19, 12:41:49 PM

This part is welcome

Page: 3

Type: Highlight Author: annec Subject: Highlight Date: 20-Mar-19, 12:44:16 PM

More evidence that such alterations are achievable and the extent of mitigation they would provide would need to be provided before a condition was acceptable on this aspect of the design.

Page: 3

Type: Highlight Author: annec Subject: Highlight Date: 20-Mar-19, 12:47:53 PM

Localised screening around the edges is not going to address the perception from elevated locations on the north side of the loch where the topside of the roof is seen. It is also possible that localised earthworks can end up drawing more attention to the facility.

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Page: 4

Type: Highlight Author: annec Subject: Highlight Date: 20-Mar-19, 12:46:36 PM

A planning condition is probably acceptable for this aspect.