

## **Chapter 8: Hydrology and Hydrogeology**

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### 8. Hydrology and Hydrogeology

#### 8.1. Executive Summary

- 8.1.1. SSE Generation Limited (hereafter 'the Applicant') is proposing to vary Achany Extension Wind Farm (hereafter 'the Consented Development') to increase the height of all 18 turbines to a new maximum tip height of up to 200 m (hereafter 'the Proposed Varied Development').
- 8.1.2. **Chapter 10: Hydrology** of the **2021 EIAR** found that, subject to implementation of appropriate mitigation measures, managed through the Construction Environment Management Plan (CEMP), Pollution Prevention Plan (PPP), and adherence to regulatory guidance, there would be no significant effects on the hydrology and hydrogeology of the Site associated with construction, operation or decommissioning of the Proposed Development.
- 8.1.3. The proposed amendments to the Consented Development do not change the findings of the 2021 EIAR (**Chapter 10: Hydrology, 2021 EIAR**) and the good practice measures detailed therein remain wholly applicable and relevant to the Proposed Varied Development.
- 8.1.4. The significance of likely effects therefore remains as assessed in the 2021 EIAR and no significant effects would arise as a result of the Proposed Varied Development. No further or additional site investigation or monitoring, over and above that identified in the 2021 EIAR, is required.

#### 8.2. Introduction

- 8.2.1. A description of the Proposed Varied Development is provided in **Chapter 2: Design Iteration and Proposed Development**.
- 8.2.2. This chapter considers the potential effects of the Proposed Varied Development on hydrology and hydrogeology. Potential effects on soils and geology are considered in **Chapter 9: Geology and Carbon Balance**.

#### 8.3. Scope of Assessment

8.3.1. The scope of this assessment has been informed by the previous assessment on hydrology and hydrogeology presented in the 2021 EIAR for the Consented Development and consultation responses from statutory consultees from the Scoping Report for the Proposed Varied Development.



#### 8.4. Consultations

- 8.4.1. Consultation, regarding hydrology and hydrogeology, with statutory consultees that was received prior to the 2021 EIAR being submitted is outlined in the **Chapter 10: Hydrology** of the **2021 EIAR**.
- 8.4.2. **Table 8.1** sets out relevant consultee responses with respect to hydrology and hydrogeology following submission of the Scoping Report for the Proposed Varied Development (**Technical Appendix 3.1: Scoping Report**).

Table 8.1: Consultee Responses for the Proposed Varied Development

Consultee	Summary of Key Issues	Response to Comments
Energy Consents Unit (ECU) Scoping Opinion 13 August 2025	Scottish Water did not provide any information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. It did not respond to the consultation. However Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development and includes details in the EIA report of any relevant mitigation measures to be provided.	It has been confirmed in  Chapter 10 of the 2021 EIAR that there are no Scottish Water assets or DWPAs within or hydraulically connected to the Proposed Development. This remains the same for the Proposed Varied Development and therefore no further consultation has been undertaken.
ECU Scoping Opinion 13 August 2025	Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.  As the proposed development has no infrastructure within 250m of a private water. supply (PWS), it is possible that a detailed risk assessment on PWS abstractions may be scoped out. However, Scottish Ministers advise that the applicant submits information detailing the assessment undertaken to date, and the sources of information which have informed the conclusion.	Noted, potential impacts of the Proposed Varied Development on PWS sources are discussed in Section 8.8 of this chapter.  PWS are shown on <b>Figure 8.4</b> .
ECU	General guidance recommended advice by Scottish Ministers include, but are not limited	A detailed NVC survey was completed as part of the 2021



Consultee	Summary of Key Issues	Response to Comments
Scoping Opinion 13 August 2025	to, an up-to-date National vegetation Classification (NVC) survey for the EIAR, a map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems (GWDTE).	EIA which has been verified as part of this assessment.  Potential areas of GWDTE are included as <b>Figure 8.5</b> and discussed in Section 8.8 of this chapter.
THC Scoping Response 25 July 2025	The EIAR needs to address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on water courses, water supplies including private supplies, water quality, water quantity and on aquatic flora and fauna. Impacts on watercourses, lochs, groundwater, other water features and sensitive receptors, such as water supplies, need to be assessed. Measures to prevent erosion, sedimentation or discolouration will be required, along with monitoring proposals and contingency plans. Assessment will need to recognise periods of high rainfall which will impact on any calculations of run-off, high flow in watercourses and hydrogeological matters. You are strongly advised at an early stage to consult SEPA as the regulatory body responsible for the implementation of the Controlled Activities (Scotland) Regulations 2005 (CAR), to identify if a CAR license is necessary and the extent of the information required by SEPA to assess any license application.	Noted. Chapter 10 of the 2021 EIA and Chapter 6 of the 2022 AIR presented details of the baseline hydrological and hydrogeological conditions at the Site and considered potential effects on the hydrology and hydrogeology in full.  This assessment has been reviewed and verified for the Proposed Varied Development, as discussed in Section 8.8 of this chapter.
THC Scoping Response 25 July 2025	If culverting should be proposed, either in relation to new or upgraded tracks, then it should be noted that SEPA has a general presumption against modification, diversion or culverting of watercourses. Schemes should be designed to avoid crossing watercourses, and to bridge watercourses where this cannot be avoided. The EIAR will be expected to identify all water crossings and include a systematic table of watercourse crossings or channelising, with detailed justification for any such elements and design to minimise impact. The table should be accompanied by photography of each watercourse affected and include dimensions of the watercourse. It may	A commitment has been made in the 2021 EIAR to ensure that watercourse crossings are designed in accordance with SEPA guidance. The detailed design of watercourse crossings will permit flood water conveyance to accommodate a 1 in 200 (0.5%) AEP plus climate change design standard. The location and photographs of each of the proposed crossings are shown in <b>Technical</b> Appendix 10.2, Watercourse



Consultee	Summary of Key Issues	Response to Comments
	be useful for the applicant to demonstrate choice of watercourse crossing by means of a decision tree, taking into account factors including catchment size (resultant flows), natural habitat and environmental concerns. Further guidance on the design and implementation of crossings can be found on SEPA's Construction of River Crossings Good Practice Guide.	Crossing Assessment, of the 2021 EIAR.  No new watercourse crossings are required as a result of the Proposed Varied Development.
THC Scoping Response 25 July 2025	The Council's Flood Risk Management Team has reviewed the information in the scoping report and has no comments to make at this stage. However, there are a number of watercourses and waterbodies on the site therefore the following applies:  • A minimum of a 50m buffer of all watercourses / bodies and turbines/crane hard-standings, which should be shown on a suitably scaled drawing;  • All tracks should be kept a minimum 10m away from any waterbody except water crossings;  • Access tracks not acting as preferential pathways for runoff and efforts being made to retain existing natural drainage wherever possible;  • Natural flood management techniques should be applied to reduce the rate of runoff where possible; use of SuDS to achieve pre-development runoff rates and to minimise erosion on existing watercourses;  • Water crossings in the form of culverts or bridges, or upgrades to existing crossings must be designed to accommodate to 1 in 200 year flood event, plus climate change;  • Land rising within any floodplain to be avoided; if ultimately required, compensatory storage must be provided; and,  • The EIAR should be informed by the Council's Flood Risk and Drainage Impact Assessment Supplementary Guidance (SG).	As per Chapter 10 of the 2021 EIAR assessment a 50m buffer to 'natural watercourses' has been applied for the Proposed Varied Development, as shown on Figures 8.1 to 8.3. No new development proposed for the Proposed Varied Development is located within the 50m watercourse buffer.  SuDS are proposed as part of the drainage design of the Consented Development, as outlined in Chapter 10 of the 2021 EIAR. It is confirmed this will also be applied for the Proposed Varied Development.  As outlined in the 2021 EIAR proposed watercourse crossings will be designed to pass a 1 in 200 (0.5%) AEP plus an allowance for climate change.  No new watercourse crossings are required as a result of the Proposed Varied Development.



Consultee	Summary of Key Issues	Response to Comments
THC Scoping Response 25 July 2025	The need for, and information on, abstractions of water supplies for concrete works or other operations should also be identified. The EIAR should identify whether a public or private source is to be utilised. If a private source is to be utilised, full details on the source and details of abstraction need to be provided.	As outlined in the 2021 EIAR any surface water or groundwater abstraction will only be undertaken in accordance with Controlled Activities Regulations (CAR) and be determined at the detailed design stage of the project.
THC Scoping Response 25 July 2025	The Council's Environmental Health Officer was consulted. The Scoping report has stated there will be no infrastructure within 250m of a private water supply. It may be that a detailed risk assessment can be scoped out however, the applicant will still be required to submit information detailing the assessment undertaken to date, particularly the sources of information which have led to that conclusion. It is understood that the CEMP or similar document will include details of embedded mitigation to prevent pollution or disruption to watercourses.	An updated assessment of PWS supplies near the Proposed Varied Development is provided in Section 8.8 of this chapter.
SEPA Scoping Response 27 June 2025	To avoid delay and potential objection the EIA submission must contain a series of scale drawings of sensitivities, for example peat depth, peat condition, Groundwater Dependent Terrestrial Ecosystems (GWDTE), proximity to waterbodies, overlain with proposed permanent and temporary development. This is necessary to ensure the EIA process has informed the layout of the development to firstly avoid, then reduce and then mitigate significant impacts on the environment. We request that the issues covered in Appendix 1 below, which provides details of our standard information requirements for EIA development and the form in which they must be submitted, and Appendix 2, which provides additional development type specific advice, be addressed to our satisfaction in the EIA process.	Chapter 10 of the 2021 EIA and Chapter 6 of the 2022 AIR considered potential effects on the hydrology and hydrogeology in full. This assessment remains wholly applicable for the Proposed Varied Development, as discussed in Section 8.8 of this chapter.  Potential areas of GWDTE are presented as Figure 8.5. An updated local hydrology figure, which shows the Proposed Varied Development and water features is presented as Figure 8.1. Hydrological features are also presented on Figure 8.2 showing both Consented Development and the Proposed Varied Development layout.



Consultee	Summary of Key Issues	Response to Comments
SEPA Scoping Response 27 June 2025	Crossings must be designed to accommodate the 0.5% annual exceedance probability flows with an appropriate allowance for climate change, or information provided to justify smaller structures. Our Climate change allowances for flood risk assessment in land use planning guidance sets out required allowances for climate change.	As outlined in Chapter 10 of the 2021 EIAR proposed watercourse crossings will be designed to convey the 1 in 200 (0.5%) AEP plus climate change event.  No new watercourse crossings are required as a result of the Proposed Varied Development.

#### 8.5. Assessment Methodology

- 8.5.1. The methodology used for this assessment is the same methodology as presented within **Chapter 10: Hydrology of the 2021 EIAR**.
- 8.5.2. It is noted that since submission of 2021 EIAR the following policy and guidance documents have been updated:
  - Scottish Planning Policy has been superseded by National Policy Framework
     4 (NPF4) (Scottish Government, 2023);
  - SEPA's guidance on groundwater abstractions (including PWS sources) has also been updated (SEPA, 2024a); and
  - SEPA's LUPS 31 guidance regarding GWDTEs has been updated (SEPA, 2024b).
- 8.5.3. The assessment is cognisant of these updated documents and the Proposed Varied Development has been assessed using these.

### 8.6. Consented Development EIAR Baseline

- 8.6.1. This section summarises the hydrology and hydrogeology baseline setting for the Consented Development which is also applicable for the Proposed Varied Development (see EIAR 2021 Chapter 10: Hydrology and 2022 AIR Chapter 6: Hydrology).
- 8.6.2. The 2021 EIAR considers the original 20 turbine layout, while the 2022 AIR presents the revised assessment following removal of turbines T10 and T20 and their associated tracks, e.g. the 'Consented Development'. The 2022 AIR concluded there would be no change to the effects on hydrology and hydrogeology, groundwater dependent terrestrial ecosystems (GWDTE) or watercourse crossings identified in the 2021 EIAR. As the 2021 EIAR contains the detailed baseline assessment information it has been used as the predominant reference source for comparative purposes for this assessment of the Proposed Varied Development effects.



8.6.3. Where relevant, data presented in **Chapter 10 of the 2021 EIAR** has been checked again current published data sources and baseline conditions verified. A site visit was also undertaken by SLR hydrologist and geologists in August 2025 to confirm ground conditions where realigned infrastructure is proposed.

#### **Surface Hydrology**

- 8.6.4. The Site is located within the surface water catchment of the River Cassley and is drained by several of its tributaries which include the Allt an Leacach, Allt Bad an t-Sagairt and Allt an Ràsail.
- 8.6.5. Surface water channels across the Site as shown on the OS 1:10,000 scale mapping (and as illustrated on **Figure 8.1**, **8.2 and 8.3**) have been denoted as 'natural watercourses' or 'ephemeral watercourses' based on site observations undertaken in the 2021 EIAR. The 'ephemeral watercourses' were found to be areas of relatively stagnant surface water accumulation and not considered to represent formal watercourses.
- 8.6.6. The northern extent of the Site is located within the catchment of the Badintagairt Private Water Supply (PWS), as shown on **Figure 10.2 of the 2021 EIAR** and **Figure 8.4**.

#### Water Quality

- 8.6.7. The River Cassley has been designated as part of the River Oykel Special Area of Conservation (SAC). The SAC is designed for the presence of Atlantic salmon (*Salmo salar*) and freshwater pearl mussels (*Margaritifera margaritifera*) which are considered sensitive to changes in water quality.
- 8.6.8. The River Cassley is classified by SEPA as being in a 'Good' overall condition in 2023 (the latest reporting cycle). This is the same classification as what was reported in the 2021 EIAR.

#### **Groundwater Bodies**

- 8.6.9. The BGS 1:625,000 scale hydrogeological mapping indicates the Site is underlain by a low productivity aquifer. Such aquifers are characterised as having limited groundwater potential, with small amounts of groundwater limited to near surface weathered zones and secondary fractures. No springs or wells were identified within the Site.
- 8.6.10. The Site is underlain by the Northern Highlands groundwater body which is classified by SEPA as being in a 'Good' overall condition in 2023 (the latest reporting cycle). This is the same classification as what was reported in the 2021 EIAR.



#### **Groundwater Dependent Terrestrial Ecosystems (GWDTE)**

8.6.11. Due to the underlying hydrogeological conditions, topography and land use, the potential GWDTE considered in the 2021 EIAR were identified as not likely to be groundwater dependent, but rather sustained by surface water and rainfall.

## 8.7. Summary of Effects Predicted & Mitigation Measures suggested for the Consented Development

8.7.1. **Table 8.2** summarises the identified effects and proposed mitigation measures for the Consented Development for the construction and operational phase of the site life.

**Table 8.2: Summary of Potential Significant Effects** 

Likely Significant Effect Without Mitigation	Mitigation Proposed	Means of Implementation	Outcome / Residual Effects
Construction			
Release of chemical pollutants.  Major (significant) potential impact on surface waters	Storage, containment and operational best practice shall be implemented.	Environmental management measures within the CEMP and	Not Significant
(including the River Oykel SAC) within and downstream of the Site, due to release of chemical pollutants.	Suitable emergency spill or leak response kits and procedures shall be in place.	associated Pollution Prevention Plan.	
Increased sediment loads.  Major (significant) potential impact on surface waters within and downstream of the Site, due to effects on water quality due to increased sediment loads.	Implementation of 50m buffers to watercourses.  Implementation of best practice with regards to construction methods in close proximity to watercourses. To include diversion ditches around excavation works.  Implementation of best	Environmental management measures within the CEMP and associated Pollution Prevention Plan. Monitoring of works by the ECoW during the construction phase.	Not Significant
	practice with regards to construction of watercourse crossings.  Baseline and subsequent water quality monitoring.		



Likely Significant Effect Without Mitigation	Mitigation Proposed	Means of Implementation	Outcome / Residual Effects
Creation of preferential drainage pathways.  Major (significant) potential impact on surface waters within and downstream of the Site, due to hardstanding and compacted surfaces leading to increased rates of surface runoff on the area of the Proposed Development and for infrastructure to create preferential drainage pathways.	Drainage management proposals to ensure preconstruction rates/volumes of runoff maintained.  The drainage management works would be monitored by the ECoW.	Detailed drainage calculations to be submitted by the contractor to quantify potential increases in surface runoff and define operational parameters for SuDS measures.	Not Significant
Reduction in the water supply to downslope mire habitats.  Major (significant) potential impact on surface waters within and downstream of the Site, due to restriction of surface water flows and near-surface flows downslope across the Site. This leads to the potential for a reduction in the water supply to downslope mire habitats.	Track design in accordance to best practice measures for the construction of tracks on peat.  Maintenance of 'clean' water flows around construction locations.  Suitable distribution of surface waters from SUDS measures.	Detailed design of tracks and infrastructure. Environmental management measures within the CEMP.	Not Significant
Alteration of sub-surface flows.  Minor (non-significant) effects on groundwater, associated with chemical pollution, alteration of sub-surface flows and lowering groundwater table.	None required.  Good practice drainage management proposals to ensure groundwater flow and hydraulic continuity is maintained.	Condition of Consent requiring scope of final CEMP to be agreed.	Not Significant
Effects on GWDTE.  Moderate/ minor (non-significant) effects on GWDTE	None required.  Good practice drainage management proposals to ensure groundwater flow and hydraulic continuity is maintained.	Condition of Consent requiring scope of final CEMP to be agreed.	Not Significant



	Implementation	Residual Effect
None required.  Ongoing maintenance for all proposed drainage measures on the Site, particularly including water crossings and sustainable drainage features designed to manage water quality and runoff rate.  Maintenance schedule for site operation to follow good practice for managing hazardous	Relevant legislation and good practice measures for site operation to be followed.	Not Significant
None required.	N/A	Not Significant.
oning Effects		
	Ongoing maintenance for all proposed drainage measures on the Site, particularly including water crossings and sustainable drainage features designed to manage water quality and runoff rate.  Maintenance schedule for site operation to follow good practice for managing hazardous chemicals.  None required.	Ongoing maintenance for all proposed drainage measures on the Site, particularly including water crossings and sustainable drainage features designed to manage water quality and runoff rate.  Maintenance schedule for site operation to follow good practice for managing hazardous chemicals.  None required.  And good practice measures for site operation to be followed.

# 8.8. Revised Assessment of Effects for the Proposed Varied Development

- 8.8.1. The Proposed Varied Development is located within the same surface water and groundwater catchments as the Consented Development. There has been no change to the drainage pathways, water quality or water dependent designations since the Consented Development was assessed.
- 8.8.2. It is confirmed that no new development associated with the Proposed Varied Development is located within the 50m buffers to the 'natural watercourses' in comparison to the Consented Development. In addition, no new additional watercourse crossings are required.



- 8.8.3. PWS locations are shown on **Figure 8.4**. A review of THC PWS database (THC, 2025) and site observations confirm that there is only one PWS source located within 250m of the Proposed Varied Development. The PWS source is for a borehole for the existing Achany substation which is operated and managed by the Applicant and therefore no further assessment is required. No other PWS sources are noted within 250m of the Proposed Varied Development and no additional PWS sources to those that were assessed in the 2021 EIAR have been identified. It is therefore considered that no additional assessment on PWS is required in accordance with SEPA's guidance (SEPA, 2024a).
- 8.8.4. The proposed hardstanding areas are marginally larger for the Proposed Varied Development compared to the Consented Development, including those proposed within the catchment of the Badintagairt PWS. However, subject to the adoption of the good practice and mitigation measures outlined in the 2021 EIAR no additional effects on the downstream surface water catchments, including the catchment of the Badintagairt PWS are identified.
- 8.8.5. As discussed in Section 8.5, the guidance for assessing GWDTE has been updated since submission of the 2021 EIAR (SEPA, 2024b). The guidance has provided updated methodology for assessing potential areas of GWDTE and updated the NVC communities which may indicate groundwater dependent habitats depending on the hydrogeological setting. All NVC communities listed in the updated guidance now hold the same importance and are no longer classified as potentially moderate or high groundwater dependency. An updated GWDTE assessment for the Site is presented in **Table 8.3**. Areas of potential GWDTE are shown on **Figure 8.5**.

**Table 8.3: Updated GWDTE Assessment** 

NVC Community	Distribution within the Site and Likely Groundwater Dependency
M6	M6 dominant habitats and habitats that contain M6 are located in small linear features across the Site. The habitats are located along the banks of the mapped watercourses, surface water drainage channels and mapped surface water flow paths shown in SEPA flood mapping. It is therefore considered that the M6 habitats are predominately sustained by surface water runoff and waterlogging of soils adjacent to watercourses rather than by emerging groundwater. No further assessment is required.
M15	M15 dominant habitats are shown across large areas of the Site. The habitat is shown at a range of elevations including local hill tops and valleys. The habitat is underlain by several geologies including peat, glacial till and metamorphic bedrock. Limited groundwater is expected in the peat and glacial till deposits as a result of the bulk low permeability. Small amounts of perched groundwater could be anticipated within the near weathered zone of the metamorphic bedrock, however, the distribution of the habitat over large areas is not typical of that attributable to dominant groundwater discharge but rather by rainfall, surface water and waterlogging of soils above the low permeability deposits. It is also noted the M15 habitats are not rare and are found across large areas of



NVC Community	Distribution within the Site and Likely Groundwater Dependency
	Scotland. It is therefore considered that the M15 habitats are not sustained by groundwater, and no further assessment is required.
M23	M23 dominant habitats are located in small linear features within the centre of the Site. The habitats are located along the banks of the mapped watercourses or underlain by low permeability glacial till deposits. It is therefore considered that the M23 habitats predominately sustained by surface water runoff and waterlogging of soils adjacent to watercourses and above the low permeability deposits rather than by emerging groundwater. No further assessment is required.

- 8.8.6. Review of **Table 8.3** concludes that the potential areas of GWDTE are commonly located on ground adjacent to watercourses and underlain by either low permeability peat and glacial till deposits or across large areas of the Site. This distribution is not typical of that which is sustained by emerging groundwater, such as springs or seepage lines or associated with breaks of slopes or changing topography or geology, but rather is likely to be supported by rainfall, surface water ponding and water logging of soils adjacent to watercourses or above the low permeability deposits. This is consistent with the findings of the 2021 EIAR and no further assessment is required.
- 8.8.7. This revised assessment has confirmed that there are no new or increased sensitivity hydrological or hydrogeological receptors when compared to the 2021 EIAR.
- 8.8.8. The embedded mitigation and the commitment to use industry good practice during construction and operation made in the 2021 EIAR remain wholly applicable for the Proposed Varied Development.
- 8.8.9. It is therefore concluded that no new or additional effects on hydrology and hydrogeology are anticipated for the Proposed Varied Development, compared to those that have been fully assessed for the Consented Development in the 2021 EIAR.

## 8.9. Revised Mitigation Measures for the Proposed Varied Development

8.9.1. The mitigation measures outlined in Chapter 10 of the 2021 EIAR report (see **Table 8.2**) remain wholly applicable for the Proposed Varied Development. No additional mitigation measures are required.



## 8.10. Comparison of Effects of the Proposed Varied Development with the Effects of the Consented Development

8.10.1. The proposed amendments to the Consented Development do not change the findings of Chapter 10 of the 2021 EIA Report and no new or increased significant effects have been identified.

#### 8.11. Conclusion

8.11.1. The Proposed Varied Development will not result in any change to the significance of effects as presented in Chapter 10 of the EIA Report, which were not significant.

#### 8.12. References

Scottish Environment Protection Agency (2024a) Guidance on Assessing the Impacts on Groundwater Abstractions.

Scottish Environment Protection Agency (2024a) Guidance on Assessing the Impacts on Groundwater Dependent Terrestrial Ecosystems.

Scottish Government (2023) National Planning Framework 4.

The Highland Council (2025) Highland Council Open Map Data, available online at <a href="https://map-highland.opendata.arcgis.com/">https://map-highland.opendata.arcgis.com/</a> [Accessed August 2025].

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