

## **Glenorchy and Innishail Community Council Loch Awe Water Levels**

### **Issues paper for discussion with key stakeholders.**

Loch Awe is an environmentally important, ecologically sensitive, shared natural asset. It has multiple users that include riparian owners, local property owners, tourist businesses, SSE, DRAX, and locals and visitor recreational use.

There have been ongoing issues over water levels on the loch. Flood events in 2023-24, changing weather patterns, the current flood level assessment and its implications for planning and planning applications for an additional 2 new pumped storage hydro schemes using the loch have all led to concerns raised with the community council. At an initial meeting with Jenni Minto MSP in March the community council agreed to consult and set out issues for a meeting with all stakeholders in July.

This paper agreed by the community council at its meeting on July 10th sets out our current position.

### **1. Day to day water levels**

SSE manage the overall water levels on the loch via the operation of the barrage which they do under licence from SEPA. In their response to Jenni Minto, they state: 'We would like to reiterate that we remain committed to operating the Awe scheme in a manner that seeks to balance all of the competing interests around the loch and on the river downstream'. They argue that environmental issues constrain their ability to maintain the loch at lower levels. These include the requirement to provide short duration 'freshets' to facilitate salmon migration which are also extensively used for angling and other recreational activities such as commercial rafting and competitive canoeing events during the summer and autumn months.

It would be helpful to know what the target levels set out in the licence are and how these differ for winter and summer. Also, what conditions initiate the use of the flood gates to lower water levels on the loch. Riparian owners/users have consistently argued for a reduction in levels. The extension of winter levels in 2022 from 1st October to March 31st was welcomed but it is believed that more can be done. The reduction in water levels post Oct 7th saw the re-emergence of the shoreline - now often resubmerged following the move to summer levels on April 1st.

As a result of higher water levels, riparian owners continue to lose land to the loch. Some estimate that they have lost 4-5 meters in the last 20 years and the most recent OS maps have widened Loch Awe by a couple of meters compared to 10 years ago.

### **2. Periods heavy rainfall/ flooding**

With already high water levels, any significant rainfall leads to flooding. According to a local hydrologist, SEPA's high risk flood level was exceeded three times on 7th/8th Oct

and 23 Dec, 2023 and 6th Feb 2024. The level on 7th/8th October was the highest many people had seen in many years and threatened damage to properties around the loch-side. In the wet weather pre-flood in October 2023, the loch was already flooded even though it should have been operating at winter levels. This raises the question whether the loch was being held at a higher level prior to 7th October in preparation for the SEPA Freshet planned to start on 13th October. 3 or 4ft lower would have made a big difference.

Flooding not only affects properties and land around the loch but the whole of the catchment area. In October 2023, the A85 in Dalmally was impassable and Stronmilchan crofters suffered damage to land, supplies and livestock. If, as it appears, rainfall patterns are changing there is a need for an effective early warning system and proactive management of loch levels in anticipation of significant rainfall.

### **3. Future flood risk assessment**

In July 2023, SEPA confirmed that it couldn't support plans for a new build Portsonachan Hall positioned closer to the loch as there would be an increase in flood risk which would not meet NPF4 Policy 22. On further investigation, it has been confirmed that SEPA's flood risk assessment is based on that prepared by DRAX for their planning application for Cruachan 2.

This assessment was undertaken by Stantec Consultants on behalf of Drax. This gives a 1 in 200-year flood level of 39.8m AOD. An Argyll and Bute climate change uplift of 59% has been added to give an overall figure of 42.32m. This is some 2.4m higher than the present hall floor. For new builds, a further 0.6m freeboard has been added to give a figure of 42.92m. This is almost 6m higher than the maximum operating level of the barrage which is 37.19m AOD. At this level the A85 would be under water as would much of Stronmilchan and parts of Dalmally.

If this flood risk assessment is to be used by SEPA, it appears strange that the whole catchment area has been removed from the revised PVAs schedule. The use of these figures has already jeopardised plans to redevelop a local community facility and at least one application to build 3 houses near to the loch-side has been refused planning permission. This will have major implications for future development and the ability to insure properties both around the loch and the river Orchy area.

### **4. Impact of proposed developments**

There are currently proposals for two new pump storage hydro schemes which will make use of the loch. Cruachan 2 has already received planning permission and Balliemeanoch will be submitted in the next few weeks. Both applications suggest that their operations will have little impact on loch levels and/or flooding, yet SSE in their response to Jenni Minto state that these developments are 'likely to need

comprehensive review of the operation of the Awe barrage and releases to the River Awe below'.

With three major energy generation schemes utilising the resources of the loch, even with effective co-ordination between them, there will inevitably be an impact on local land, businesses, property and recreational opportunities which require attention. If/when the three PSHs are generating, can SEPA provide reassurance that the loch will be managed to accommodate impoundment from PSH generation without flooding or causing further erosion to low lying areas around the loch?

### **The way forward**

To address these issues, we are looking for the following:

- Independent monitoring of loch levels by SEPA with information published and in the public domain as happens for other lochs in Scotland.
- An agreement between all stakeholders (including the community council) on appropriate winter and summer water levels.
- An effective early warning system with proactive and not reactive opening of the barrage to minimise flooding.
- Investigation of alternative methods to reduce water levels at peak points such as installation of improved drainage at Ford.
- In the light of all of the above, SEPA to commission a flood risk assessment to ascertain an appropriate 1 in 200-year level.
- SEPA to carry out an urgent review of the implications of future PSH developments on future loch levels and to review licenses with all users to ensure there is no detriment to other shared users of the loch

G&ICC July 2024.