

Argyll and Bute Council  
By Email

**HASKONING UK LTD.**

74/2 Commercial Quay  
Leith  
Commercial Street  
Edinburgh  
EH6 6LX  
United Kingdom

Phone: +44 131 5550506  
Email: [info@uk.haskoning.com](mailto:info@uk.haskoning.com)  
Website: [haskoning.com](http://haskoning.com)

Our reference: PC7833-HAS-XX-XX-LT-X-0001  
Your reference: n/a  
Date: 20 February 2026  
Contact name: Evonne Maxwell  
Telephone: 07502 831405  
Email: [Evonne.Maxwell@haskoning.com](mailto:Evonne.Maxwell@haskoning.com)  
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**Glen Mallan Works EIA Screening Request**

## 1 Introduction

This letter is a request for an Environmental Impact Assessment (EIA) screening opinion from Argyll and Bute Council with regards to a Proposed Development at Glen Mallan Ministry of Defence (MOD) Site (Figure 3-1).

To inform the EIA screening request, this report provides an outline description of the proposed works, identifies the key environmental issues, and detail the way in which MOD proposes to address them. It should be noted that all information is indicative given the early stage in the development of the proposed works; however, where required, worst case assumptions have been applied to ensure a robust and precautionary screening exercise has been undertaken.

## 2 Relevant Legislation

### 2.1 Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017

The process of EIA in the context of town and country planning in Scotland is governed by The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the 2017 Regulations').



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The 2017 Regulations include Schedule 1 and Schedule 2 which list different types of development. If a development is listed in Schedule 1 ('Schedule 1 development'), an EIA is required in every case.

Developments are classed as 'Schedule 2 development' if the development is included in the first column of Schedule 2 and exceeds the applicable thresholds of criteria set out in the second column. In these cases, the local planning authority needs to screen the development to determine whether significant effects on the environment are likely and, therefore, whether EIA is required. Developments listed in Schedule 2 which are located in a 'sensitive area' (as defined in the 2017 Regulations) are also Schedule 2 development and need to be screened, regardless of whether or not they meet the applicable thresholds or criteria.

It is concluded that the proposed development falls within the following category of development listed in Schedule 2 of the 2017 Regulations: 10 (a) – Infrastructure projects: Industrial estate development projects.

Having regard to the applicable thresholds and criteria for the above category of development, it is concluded that the proposed development falls above the applicable thresholds, and criteria of an area greater than 0.5 ha.

On the basis of the above, it is concluded that the proposed development does constitute a Schedule 2 development and therefore is required to be screened against the criteria in Schedule 3, based on the characteristics, location and potential impacts of the proposed development, to determine whether an EIA is required.

A separate EIA screening request has been sent to Marine Directorate Licensing Operations Team (MD-LOT) under the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

### **3 Proposed Development**

The Glen Mallan site is currently an area of undeveloped hardstanding (Plate 3-1). The Proposed Development includes the development of the site to provide welfare facilities. Modifications required to the existing site are described in further detail below and will comprise:

- Preparatory works (vegetation clearance and rock breaking);
- Erection of a two-storey building;
- Provision of a turning circle and parking for 30 cars and four coaches;
- Installation of a small security check kiosk;
- Erection of a security fence around the site perimeter; and
- Seawater extraction and storage.



Plate 3-1 View of existing site

### 3.1 Preparatory works

Although the majority of site footprint is currently hardstanding, there is a requirement to create a level area for the building and parking, and for a 10 m clearance around the site perimeter. Therefore, it is necessary to remove an area of the rock outcrop to the north of the site, and also to clear the vegetation around the perimeter, resulting in a total site area of 3.097 ha.

At this time it is expected that 15,000 m<sup>3</sup> of material (rock) will need to be cleared. It is likely that this will be done through the use of small charges and breaking. Where possible material will be graded and re-used on site. It has been suggested that any surplus rock can be used for maintenance of tracks and roads between Glen Mallan and Glen Douglas. It may be necessary to clear up to 8,025 m<sup>2</sup> of vegetation around the site perimeter.

### 3.2 Erection of a two-storey building

It is proposed to construct a two-storey welfare building. The proposed building dimensions are approximately 9 m wide, 21 m long and up to 9.6 m high, excluding any roof mounted services. The details of building construction are still to be determined but will be either modular or a traditional build. This building will provide welfare facilities to MOD personnel at Glen Mallan.

### **3.3 Parking**

The entire site will be surfaced with tarmac and road marking paint used to demarcate 30 car parking bays (2.5 m x 5 m) and four coach parking bays (16 m x 5m). A 28 m diameter turning circle will also be marked.

### **3.4 Erection of a security fence**

In order to provide the level of security required on MOD sites, it is proposed that a metal post and mesh security fence of approximately 3 m, with a 0.6 m razorwire top, will be erected around the perimeter of the proposed development. CCTV and lighting columns will be located within the site boundary combining and affording coverage to a combination of fixed and pan tilt zoom (PTZ) cameras mounted to the lighting columns.

### **3.5 Security kiosk**

A small security kiosk will be installed within the site. The construction of the kiosk is yet to be determined but is anticipated to be a standard glass reinforced plastic security kiosk such as those supplied by Gladstone<sup>1</sup>.

### **3.6 Drainage**

Drainage will be required to convey surface water and foul water from the site. Roof water and rock face/land run-off will be conveyed through a filter trench/cutoff drain at the base of the rock cutting. Car and coach park run-off will be conveyed into an underground interceptor, and foul water from the building will be processed through a foul treatment plant. Following relevant treatment, all three sources will converge into a single pipe to outfall either into the Glenmallan Burn south of the site, or into the marine area (to be determined following further design work).

The southern end of the site is proposed to be raised, using site-won material where possible, to reduce the risk of flooding from surface water and to aid drainage.

### **3.7 Seawater extraction and storage**

In order to align with the current legislative requirement for firefighting capabilities within new developments for the welfare building it is proposed to install a 45m<sup>3</sup> tank with an accompany pumping system to utilise the nearby seawater for any firefighting requirements. The area has limited access to fresh water and the low levels of pressure available in the Proposed Development area prevents the use of more convention firefighting systems such as sprinklers. This proposed infrastructure system will include a seawater extraction pump, a pump to pump it into a dedicated tank onshore and the dedicated tank for storage. To facilitate this, civil structures will be required in the form of foundations to support the tank and asset of dedicated Loss Prevention Certification Board (LPCB) listed fire pumps and all required and functional accessories installed within an enclosure to prevent tampering and other potential damage.

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<sup>1</sup> <https://uk.glasdon.com/buildings-housings/grp-kiosks-prefab-booths>

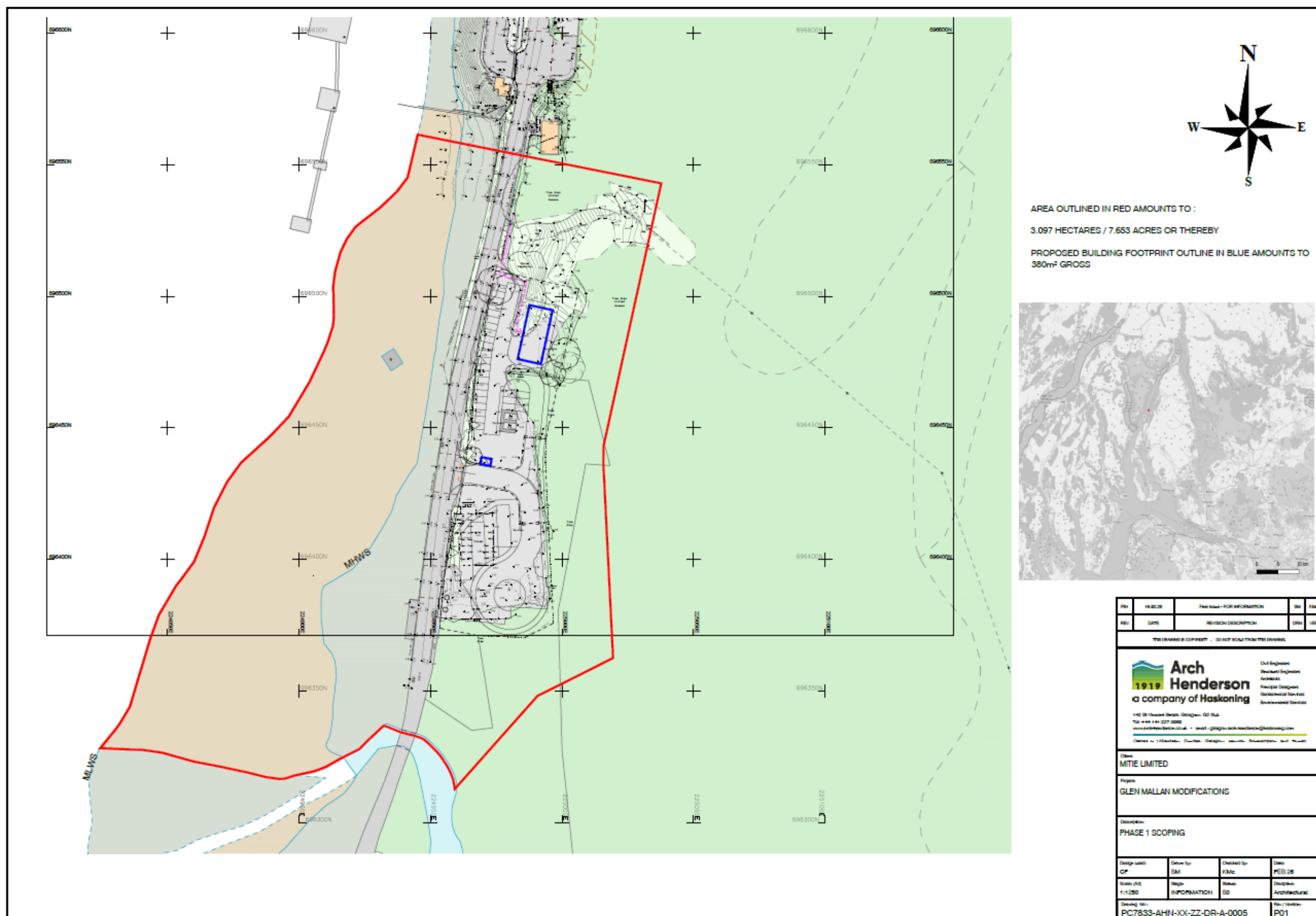


Figure 3-1 Site location and expected site layout

## 4 Site and Surrounding Area

### 4.1 Location

Glen Mallan MOD site is in a quiet rural setting. The area north, east and south of the Proposed Development is encompassed by a steep wooded hillside, and to the west the site is bounded by the A814 and eastern banks of sea loch, Loch Long. There are very few residential properties in proximity of the site, which all lie empty. The Glen Mallan Jetty, utilised by the MOD, is situated on the banks of the Loch, approximately 100 m north west of the site, along the A814.

## 5 Baseline Environment

### 5.1 Environmental designations

The nature conservation designated sites within 5 km of Glen Mallan MOD site are listed in Table 5-1 and shown in Figure 5-1.

*Table 5-1 Nature conservation designated site within 5 km of proposed works*

| Designation                               | Site Name                         | Qualifying Features                                                                                                                           | Distance |
|-------------------------------------------|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|----------|
| National Park                             | Loch Lomond and Trossachs         |                                                                                                                                               | 0.5 km   |
| Geological Conservation Review (GCR) Site | Portincaple, Dumbarton            | Dalradian                                                                                                                                     | 3.1 km   |
| Marine Protected Area (MPA)               | Upper Loch Fyne and Loch Goil MPA | Burrowed mud<br>Flame shell beds<br>Horse mussel beds<br>Ocean quahog aggregations<br>Sublittoral mud and specific mixed sediment communities | 3.6 km   |

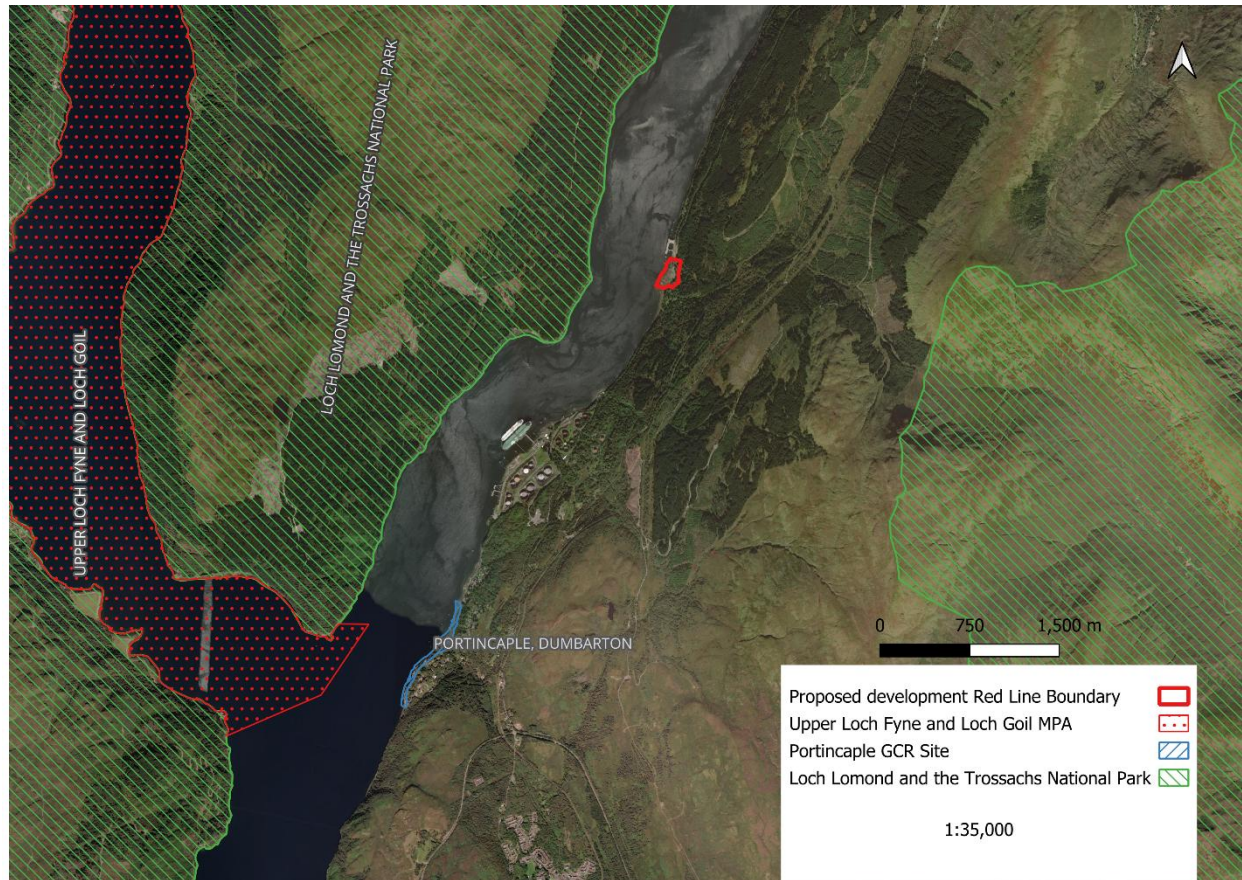


Figure 5-1 Designated sites within 5 km of the Proposed Development

## 5.2 Biodiversity

A desk study has been conducted to identify the potential presence of features of interest within the vicinity of the Proposed Development.

Data obtained from National Biodiversity Network Atlas (NBN Atlas, 2026<sup>2</sup>) within 5 km of the Proposed Development in the last 20 years identified the following notable terrestrial mammal species:

- Red squirrel
- Otter
- Pine marten
- Common pipistrelle

Data from NBN Atlas (2026) within 5 km of the Proposed Development in the last 20 years also identified the following Scottish Biodiversity List and Wildlife and Countryside Act 1981 Schedule 1 bird species:

- Black grouse (Schedule 1)
- Black-headed gull
- Bullfinch (Schedule 1)

<sup>2</sup> Only data available under OGL, CCO and CC-BY licences used.

- Cuckoo (Schedule 1)
- Curlew
- Grasshopper warbler (Schedule 1)
- Hen harrier
- Herring gull
- Hooded crow
- House sparrow (Schedule 1)
- Lesser redpoll (Schedule 1)
- Red-throated diver
- Reed bunting (Schedule 1)
- Siskin
- Spotted flycatcher (Schedule 1)
- Tree pipit (Schedule 1)
- Wood warbler

Invasive Non-Native Species (INNS) of note within the proximity of the Proposed Development (NBN Atlas, 2026) include:

- Grey squirrel
- Rhododendron

Habitat Map of Scotland's Native Woodland Survey of Scotland (NWSS)<sup>3</sup> classifies the woodland surrounding the site of the Proposed Development as Native Woodland which is surrounded by Planted Ancient Woodland Sites. The species structure<sup>4</sup> of the woodland surrounding the site, has 60% identified as INNS Rhododendron, with remaining 40% made up of the following native species:

- Ash
- Pedunculate oak
- Downy birch
- Hazel
- Grey willow

### 5.3 Water quality

The proposed development is adjacent to Loch Long, Clyde Water Framework Directive (WFD) coastal water body (ID: 200051) Loch Long North. The current overall classification of this water body is Good as of 2024<sup>5</sup> data.

The Glenmallan Burn collects hillside drainage and conveys it into Loch Long approximately 30 m south of the site. The burn is not a WFD classified watercourse and therefore status is unknown.

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<sup>3</sup> [Map | Scotland's environment web](#)

<sup>4</sup> [Native Woodland Survey of Scotland - Data Explorer](#) (Accessed February 2026)

<sup>5</sup> [Water Classification Hub](#) (Accessed February 2026)

The Proposed Development site is adjacent to the Loch Long protected shellfish waters (SEPA48) which had a classification of Good Overall Status in 2023<sup>5</sup>.

## 5.4 Flood risk

The Scottish Environment Protection Agency (SEPA) flood maps<sup>6</sup> indicate the area of the proposed development assigned for the coach parking and turning circle are within the high likelihood of surface water flooding (10% chance of flooding each year). The northern part of the site, where the building is proposed to be built, does not fall within any area with a likelihood of surface water flooding.

The site falls outside of the potential of any coastal or river water flooding areas.

## 5.5 Noise

The Proposed Development is in a rural setting, with woodland covering the hill behind the site and the loch directly adjacent to the A814. There are no human receptors within 1 km of the site. The hamlet of Glenmallan was abandoned in the mid-19<sup>th</sup> century<sup>7</sup>, and the properties within 1 km of the site are understood to be unoccupied. The closest human receptor is likely to be at the Lochside Cottage, Finnart, 1.07 km from the Proposed Development, adjacent to the now closed Finnart Oil Terminal. This property was sold and purchased in 2025<sup>8</sup> and is therefore assumed to be occupied.

## 5.6 Climate and air

There are no occupied residential properties within 1 km of the proposed development. The closest human receptor is approximately 1.07 km away. No Air Quality Management Area information is currently available for Glen Mallan.<sup>9</sup>

## 5.7 Heritage

The area within 1 km of the Proposed Development has no scheduled monuments, battlefields, world heritage sites, gardens and designed landscapes, or conservation areas. There is one listed building, Finnart, Arrochar Road, Glenmallen House, Stables and Gatepiers (LB14442<sup>10</sup>), this is a category B listed building, added in March 1994. The building and surrounding infrastructure was listed due to the special interest of it reputedly built for the mistress of Lord Colquhoun of Luss in the 1820s.

## 5.8 Landscape

The area of the Proposed Development is not in any National Scenic Area, it is in a secluded predominantly wooded area, with few visual receptors. The site sits on the A814, adjacent to the existing jetty infrastructure.

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<sup>6</sup> [SEPA Flood Maps](#) (Accessed February 2026)

<sup>7</sup> [Loch Long hamlet of Glenmallan is no more](#) (Accessed February 2026)

<sup>8</sup> [House Price History](#) (Accessed February 2026)

<sup>9</sup> [Air Quality Management Areas](#) (Accessed February 2026)

<sup>10</sup> [FINNART, ARROCHAR ROAD, GLENMALLEN HOUSE, STABLES AND GATEPIERS \(LB14442\)](#) (Accessed February 2026)

## 5.9 Traffic & transport

The proposed development is situated on the A814 which connects Dumbarton and Arrochar, although the main route between these two locations is the A82 on the western shore of Loch Lomond. The Average Annual Daily Flow (AADF) from 2000-2024<sup>11</sup> from a mixture of estimates and manual counts are detailed in Table 5-2.

Table 5-2 AADF from 2000 - 2024 for count point 80367

| Direction | Pedal cycle | Motorcycles | Cars | Buses | LGVs | HGVs | Total |
|-----------|-------------|-------------|------|-------|------|------|-------|
| North     | 2           | 10          | 243  | 5     | 63   | 14   | 334   |
| South     | 2           | 6           | 267  | 4     | 66   | 13   | 356   |

## 5.10 Waste

There are no demolition activities therefore the only waste expected to be produced is the removal of rock/ground material. This is expected to be utilised on site with any remaining rock to be used in repairs to the track between the Proposed Development site and Glen Douglas MOD property.

## 6 Potential Environmental Effects

The characteristics of the Proposed Development presented in this EIA screening request are considered to be representative of the worst case scenario. An assessment of the potential environmental impacts of the Proposed Development, based on professional opinion, consultation with Argyll and Bute Council and published sources, is presented in Table 6-1. It is assumed that any amendments to the design would fall within the envelope of worst case scenario assessment and therefore a separate assessment would not be required. However, should the scale or potential impacts of the project change significantly, the project would be re-screened.

<sup>11</sup> [Road Traffic website - Count point 80367](#)

Table 6-1 Potential environmental effects and potential mitigation

| Topic / Receptor | Potential Impacts                                                                                                                                            | Potential Effects and Mitigation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Likely Significance |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| Designated sites | <p>Landscape and visual effects</p> <p>Generation of vibration from construction activities</p> <p>Changes to water quality from construction activities</p> | <p>The Proposed Development does not lie within any designated sites.</p> <p>Loch Lomond and the Trossachs National Park lies approximately 0.5 km from the Proposed Development. The site comprises an existing hardstanding area set within a steep, wooded hillside, which provides a high degree of visual containment. As a result, the site is not visible from the east, including from within the National Park boundary in that direction.</p> <p>While limited visibility may be possible from across Loch Long, the modest scale of the site, together with the presence of existing development (the jetty) and the wider landscape context, means the proposal would not give rise to perceptible changes to landscape character or visual amenity at the National Park scale.</p> <p>The GCR site designated for Dalradian geology is located approximately 3.1 km from the Proposed Development. The GCR site represents a high-value geological receptor designated for the protection of national important rock exposures. Construction activities may include rock blasting, which has the potential to generate ground-borne vibrations. However, given the substantial separation distance between the site and the GCR site, together with rapid attenuation of vibration with distance, it is considered unlikely that construction generated vibration would be perceptible at the GCR site.</p> <p>In addition, any blasting would be undertaken in accordance with the relevant industry standards and controlled blasting practices (BS 5228-2<sup>12</sup>), further limiting vibration effects beyond the immediate vicinity of the site.</p> <p>The Upper Loch Fyne and Loch Goil MPA, designated for sensitive marine habitats and species, is located 3.6 km from the Proposed Development. The proposed activities are all inland and construction-phase surface water run off would be managed through standard pollution prevention and drainage controls in accordance with best</p> | Not significant     |

<sup>12</sup> BS 5228-2:2009 Code of practice for noise and vibration control on construction and open sites. Vibration (+A1:2014), British Standards Institution - Publication Index | NBS (Accessed February 2026)

| Topic / Receptor | Potential Impacts                                                                     | Potential Effects and Mitigation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Likely Significance |
|------------------|---------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
|                  |                                                                                       | practice. New operational drainage will be subject to appropriate treatment and licensing prior to discharge.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                     |
| Biodiversity     | <p>Habitat loss</p> <p>Species mortality</p> <p>Disturbance</p> <p>Spread of INNS</p> | <p>In order to maintain the required security around the site it will be necessary to clear a 10 m buffer on the outside of the fenceline. This is included within the red line boundary.</p> <p>Based on spatial analysis of the National Woodland Survey of Scotland GIS layer, the required native woodland removal for the 10 m standoff is 0.96 ha. However, based on aerial mapping, taking account of areas that are currently hardstanding, it is anticipated that up to 0.803 ha vegetation may need to be cleared. The Native Woodland comprises 60% shrub cover and with a smaller proportion of mature and immature trees. Where larger trees of high biodiversity value are required to be felled, these will be pulled back into the adjacent woodland for natural decomposition processes, thereby maintaining habitat continuity and providing ongoing ecological benefits. This approach benefits deadwood dependent species and minimise the loss of biodiversity value associated with tree removal and ensures the woodland structure and ecological function are largely retained.</p> <p>Whilst the red line boundary indicates the project limits will go down to MLWS and to the Glenmallan Burn in the south, it is not expected that the entirety of this area will be required to be cleared, as this is primarily for the facilitation of drainage to sea or river outfalls. The extent of the red line boundary is to encompass the outfall locations and not for woodland clearance.</p> <p>Ecological surveys will be undertaken in accordance with best practice, to determine the presence of protected species in the vicinity of the site.</p> <p>European Protected Species licences will be applied for if protected species are identified that could be impacted by the works. Best practice measures, such as vegetation clearance outside of the breeding bird season, angled lighting, etc., will be in applied during construction and further mitigation measures will be identified as necessary.</p> <p>The operational boundary lighting required on the fenced perimeter will be sensitively designed to reduce disturbance, for instance with angled cowl and reduced lumens.</p> <p>Spread of INNS would be managed using standard mitigation measures in line with recommendations in the Scottish Government Code of</p> | Not significant     |

| Topic / Receptor        | Potential Impacts                                                                                                                                           | Potential Effects and Mitigation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Likely Significance |
|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
|                         |                                                                                                                                                             | <p>Practice on Non-Native Species, a precautionary approach will be taken for materials/equipment used.</p> <p>The shrub layer within the affected woodland is dominated by non-native species, <i>Rhododendron ponticum</i>. Control and treatment of the <i>Rhododendron</i> would be undertaken in accordance with current Forestry and Land Scotland management measures, including appropriate follow-up treatment to prevent regrowth and re-establishment. This approach contributes towards long-term woodland restoration and improved ecological resilience goals.</p> |                     |
| Water quality           | <p>Surface water run-off from construction activities</p> <p>Accidental spills or leaks from construction</p> <p>Surface water run-off during operation</p> | <p>Surface water run-off and accidental spills and leakages are standard construction industry hazards and are commonly and routinely managed using current industry standard practices and procedures and a Construction Environmental Management Plan (CEMP).</p> <p>Surface water run-off during operation will be managed through incorporation of drainage strategies, including the raising and levelling of the carpark area within the high risk to surface water flooding area. Drainage will be treated and will be subject to licensing by SEPA.</p>                  | Not significant     |
| Flood risk              | <p>Risk to construction compounds from surface water flooding</p> <p>Flood risk during operation</p>                                                        | <p>The implementation of best practice measures and CEMP will be adopted (including signing up to flood alerts) to avoid flood risk to the construction compound and workers during the construction phase.</p> <p>Risk of surface water flooding will be significantly reduced with the raising and levelling of the carpark, bus parking and turning circle area of the proposed development.</p> <p>Surface water drainage and treatment is incorporated into the Proposed Development.</p>                                                                                   | Not significant     |
| Noise                   | Generation of noise during construction                                                                                                                     | There are no residential receptors within 1 km of the Proposed Development therefore impacts of noise are likely to be limited. The implementation of best practice measures and CEMP will manage potential noise impacts during construction.                                                                                                                                                                                                                                                                                                                                   | Not significant     |
| Climate and Air quality | <p>Dust emissions from construction activities.</p> <p>Embodied carbon in construction materials</p>                                                        | Application of the standard dust control and management techniques, as laid out in the Institute of Air Quality Management (IAQM) guidance document <sup>13</sup> and CEMP would minimise the risk of significant effects in respect of dust or fine particulate matter.                                                                                                                                                                                                                                                                                                         | Not significant     |

<sup>13</sup> [Construction-Dust-Guidance-Jan-2024.pdf](#) (Accessed February 2026)

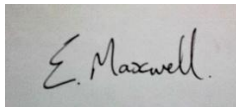
| Topic / Receptor      | Potential Impacts                                                                         | Potential Effects and Mitigation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Likely Significance |
|-----------------------|-------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
|                       |                                                                                           | Where possible materials will be re-used on site to reduce the need for additional construction materials.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                     |
| Heritage              | Direct or indirect physical impacts                                                       | There is only one listed building within 1 km from the Proposed Development. Given the separation distance between the site and listed building with the vegetation in between, the setting of the listed building would not be disturbed. There is no pathway for direct or indirect impacts on heritage features.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Not significant     |
| Landscape             | Disruption to visual characteristics                                                      | Whilst the Proposed Development will alter the immediate area and surroundings, visibility of the site is limited and the Proposed Development will be in context with existing infrastructure (Glen Mallan Jetty, Finnart Oil Terminal) in the area. It is not expected to have impact on any human receptors or their current views.                                                                                                                                                                                                                                                                                                                                                                                                                                              | Not significant     |
| Traffic and transport | Increased traffic due to construction activities<br><br>Increase traffic during operation | A temporary increase in traffic is expected during construction activities, including construction vehicles and material delivery. Construction traffic would be short term and time-limited. Construction traffic would be managed where necessary, through standard best practice measures, including routing, timing of deliveries, and site access management. By reusing materials on site as much as possible the volume of construction traffic will be reduced, and transport of any material towards the Glen Douglas site will be on the main A814 for only around 100 m before accessing the private road.<br><br>Given the scale of the development the operational traffic is not expected to result in a material change in traffic flows, congestion or road safety. | Not significant     |
| Waste                 | Disposal of construction waste                                                            | Material will be reused on site as much as possible, with landfill site being kept as low as possible. Where not possible to be used on site, rock and rubble removed from the hillside will be used for road repairs to the Glen Douglas track. Waste will be managed through a site water management plan and the appropriate waste licensing.<br><br>Operational waste generated on site will be managed in accordance with an operational site waste management plan and will be in line with MOD standard refuse collection arrangements. No dangerous or hazardous waste is anticipated on site.                                                                                                                                                                              | Not significant     |

## 7 Conclusion

Based on the potential effects resulting from the Proposed Development at Glen Mallan MOD site, we do not consider the proposed works to constitute an EIA development in accordance with the Town and Country (EIA) (Scotland) Regulations 2017. It is acknowledged that further surveys and studies will be undertaken prior to commencement of any construction activities to ensure that potential impacts on protected species are appropriately managed and mitigated.

We would be grateful if Argyll and Bute Council could provide a formal EIA screening opinion confirming that an EIA is not required for the proposed development.

Yours sincerely,



**Evonne Maxwell**

Principal Environmental Consultant  
Water & Maritime