

PE2109/J: Halt any further pump storage hydro schemes on Scottish lochs holding wild Atlantic salmon

NatureScot written submission, 13 October 2025

The Committee asks two questions:

- 1) what information is held by NatureScot on the impact of pumped storage hydro on wild Atlantic salmon and how this is considered when providing comment on planning applications in its role as a statutory consultee; and
- 2) what are NatureScot's considerations of the cumulative impact of numerous proposals for pumped storage hydro schemes.

NatureScot recognises that Atlantic salmon are ecologically, culturally and economically important and, within the UK, Scotland is a stronghold for this species. Catch data, which has been collected by the Marine Directorate since 1952, reflects an overall decline in the numbers of fish returning to Scottish rivers. This decline has led to the IUCN declaring that Atlantic salmon populations within Great Britain are 'Endangered'. Atlantic salmon are listed in Annex II of the EU Habitats Directive and are a protected feature in a total of 17 Special Areas of Conservation (SAC). Atlantic salmon ascend Scottish rivers in every month of the year and several of those rivers, and others which are not SACs, also contain on-line loch systems through which, at least some of, these fish must negotiate as they make their way to natal spawning locations. It is important to ensure that these fish are allowed to do so, in a way that avoids unnecessary mortality or delay. As with all abstractions and releases of water it is important to design schemes in such a way that they do not attract or impinge downstream migrating Atlantic salmon smolts or create in-loch conditions which cause confusion or disorientation. For adults (both upstream migrants and downstream migrating kelts), whilst impingement is perhaps less likely, it is also important to consider whether changes in the uptake and discharge of water will affect their ability to reach spawning areas. It is also vital to ensure that Atlantic salmon of all life-history stages (particularly smolts and kelts) can successfully exit affected lochs, and that flows from affected lochs to outflowing rivers are sufficient to ensure the upstream migration of adult fish.

1). NatureScot's role in relation to pump storage hydro schemes (PSHS) is to advise on the implications of proposals for protected areas. There are currently a range of pump storage hydro schemes at various stages of development in Scotland. In providing advice, specialist NatureScot staff utilise a range of information sources from within the published scientific literature, other studies, developer reports and their own scientific experience to inform our response to any proposal.

Under the Habitats Regulations, all competent authorities must consider whether any plan of project could affect a European site and if so, they must carry out a Habitats Regulation Appraisal (HRA). NatureScot provides guidance to Competent Authorities, on the scope and content of any HRA. For any notified interest, such as Atlantic salmon, this advice is strongly linked to the Conservation Objectives for that feature, and within that site. The Scottish Environment Protection Agency (SEPA) must also authorise and regulate activities associated with PSHS through the

Controlled Activities Regulations. These include activities which may impact freshwater fish and their supporting habitats. In line with [our guidance for consulting authorities](#) it is not our role to advise on potential effects on Atlantic salmon that are not connected to protected areas.

2). In relation to cumulative effects, before a competent authority can consent or authorise a plan or project that could potentially impact the qualifying interests of a European site, it must first consider whether the proposal is likely to have a significant effect on the qualifying interests of the site, either alone or in combination with other plans or projects (Regulation 48 of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended/ Regulation 63 of The Conservation of Habitats and Species Regulations 2017). If so, an appropriate assessment must be carried out in view of the site's conservation objectives. This assessment should consider the impacts of the proposal on the conservation objectives of the site, and this might also include cumulative effects from other plans and projects. Cumulative effects could include impacts from similar types of proposals, different types of plans or projects, or different elements of the same project. As part of our role described above, we provide advice the Competent Authority on these potential cumulative impacts.

As a statutory consultee in individual Planning and Electricity Act cases we assess each application against its merits according to the nature affected and the relevant policy frameworks. One such policy consideration is National Planning Framework 4 (NPF4) which sets out Scottish Government's national spatial policy: spatial principles, regional priorities, national developments and national planning policy. Within NPF4, Pumped Hydro Storage is the 2nd national development listed and is considered accordingly in the planning balance.

Individual case officers consider cases in the context of the following two pieces of internal guidance, to ensure we operate in a consistent and reasonable way:

- [Identifying Natural Heritage Issues of National Interest in Development Proposals](#)
- [Guidance - Development Management and the Natural Heritage](#).