Report on Consultation - Route Selection

Dunoon to Loch Long 132 kV OHL Rebuild

April 2021

REF: LT000193-WSP-ENV-RPT-001

Scottish & Southern Electricity Networks

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GLOSSARY

Term	Definition
Alignment	A centre line of an overhead line (OHL), along with location of key angle structures.
Amenity	The natural environment, cultural heritage, landscape and visual quality. Also includes the impact of SHE Transmission's works on communities, such as the effects of noise and disturbance from construction activities.
Conductor	A metallic wire strung from structure to structure, to carry electric current.
Consultation	The dynamic process of dialogue between individuals or groups, based on a genuine exchange of views and, normally, with the objective of project decision making.
Corridor	A linear area which allows a continuous connection between the defined connection points. The corridor may vary in width along its length; in unconstrained areas it may be many kilometres wide.
Environmental Impact Assessment (EIA)	A formal process set down in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 used to systematically identify, predict and assess the likely significant environmental impacts of a proposed project or development and identify appropriate mitigation measures to avoid, prevent, reduce or offset likely significant adverse effects on the environment.
Gardens and Designed Landscapes (GDLs)	The Inventory of Gardens and Designed Landscapes lists those gardens or designed landscapes which are considered by a panel of experts to be of national importance.
Groundwater dependent terrestrial ecosystem (GWDTE)	Wetlands which critically depend on groundwater flows and /or chemistries.
Habitat	Term most accurately meaning the place in which a species lives, but also used to describe plant communities or agglomerations of plant communities.
Kilovolt (kV)	One thousand volts.
Listed Building	Building included on the list of buildings of special architectural or historic interest and afforded statutory protection under the 'Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997' and other planning legislation. Classified categories A – C.
Micro-siting	The process of positioning individual structures to avoid localised environmental or technical constraints.
Mitigation	Term used to indicate avoidance, remediation or reduction of likely significant adverse effects on the environment (see definition of EIA).
National Scenic Area (NSA)	A national level designation applied to those landscapes considered to be of exceptional scenic value.
Overhead line (OHL)	An electric line installed above ground, usually supported by lattice steel towers or poles.
Plantation Woodland	Woodland of any age that obviously originated from planting.
Riparian Woodland	Natural home for plants and animals occurring in a thin strip of land bordering a stream or river.
Route	A linear area of approximately 1km width (although this may be narrower/wider in specific locations in response to identified pinch points / constraints), which provides a continuous connection between defined connection points.
Route (preferred)	A route for the overhead line taken forward to stakeholder consultation following a comparative appraisal of route options.
Route (proposed)	A route taken forward following stakeholder consultation to the alignment selection stage of the overhead line routeing process.

Term	Definition
Routeing	The work undertaken which leads to the selection of a proposed alignment, capable of being taken forward into the consenting process under Section 37 of the Electricity Act 1989.
Scheduled Monument	A monument which has been scheduled by the Scottish Ministers as being of national importance under the terms of the 'Ancient Monuments and Archaeological Areas Act 1979'.
Semi-natural Woodland	Woodland that does not obviously originate from planting. The distribution of species will generally reflect the variations in the site and the soil. Planted trees must account for less than 30% of the canopy composition
Site of Special Scientific Interest (SSSI)	Areas of national importance. The aim of the SSSI network is to maintain an adequate representation of all natural and semi-natural habitats and native species across Britain.
Span	The section of overhead line between two structures.
Special Area of Conservation (SAC)	An area designated under the EC Habitats Directive to ensure that rare, endangered or vulnerable habitats or species of community interest are either maintained at or restored to a favourable conservation status.
Special Landscape Area (SLA)	Landscapes designated by Argyll and Bute Council which are considered to be of regional/local importance for their scenic qualities.
Special Protection Area (SPA)	An area designated under the Wild Birds Directive (Directive 79/409/EEC) to protect important bird habitats. Implemented under the Wildlife and Countryside Act 1981.
Stakeholders	Organisations and individuals who can affect or are affected by SHE Transmission works.
Study Area	The area within which the corridor, route and alignment study takes place.
Terminal Structure	A structure (tower or pole) required where the line terminates either at a substation or at the beginning and end of an underground cable section.
The National Grid	The electricity transmission network in the Great Britain.
Volts	The international unit of electric potential and electromotive force.
Wayleave	A voluntary agreement entered into between a landowner upon whose land an overhead line is to be constructed and SHE Transmission
Wild Land Area (WLA)	Those areas comprising the greatest and most extensive areas of high wildness. It is not a statutory designation, but wild land areas are considered nationally important.

PREFACE

This Report on Consultation has been prepared by WSP UK Ltd. on behalf of Scottish Hydro Electric Transmission plc (SHE Transmission plc) to provide a summary of the responses received from key stakeholders (including statutory and non-statutory consultees, local communities, landowners and individual residents) throughout the project to date. A Consultation Document[1] was published in November 2020 which sought comments on the proposals, the approach to route selection, the analysis of route options and the identification of a Preferred Route.

This Report on Consultation describes how the feedback from consultation has informed the identification of the Proposed Route. Once confirmed, the proposed route is then taken forward for the subsequent detailed design stages of the project.

Under normal circumstances, consultation on the project would involve public engagement events held in the local area. However, as a result of the Covid 19 pandemic these events could not be held.

To continue engagement on the project SHE Transmission developed an online consultation tool, to enable the local community to experience the full exhibition from home on a computer, tablet or mobile device. The online exhibition was designed to look and feel like a real consultation in a community hall, with exhibition boards, maps, and the opportunity to share views on the proposals.

Visitors were able to engage directly with the project team, via a live chat function, where they could ask any questions they might have about the project and share their feedback on the current proposals.

The virtual consultation events took place via the project website:

www.ssen-transmission.co.uk/projects/dunoon at the following times:

- 3rd November 2020; 10am – 12.30pm and 5pm – 7.30pm

This Report on Consultation also provides a summary of how SHE Transmission have responded to comments received by key stakeholders on the Preferred Route and details the actions that will be taken as the project progresses through to the alignment stage.

[1] SHE Transmission (October 2020). Dunoon to Loch Long 132 kV OHL Rebuild Consultation Document (70065799-LT193_CD)

EXECUTIVE SUMMARY

Dunoon is currently connected to the wider electricity grid network by a twin-circuit 132 kV double circuit Overhead Line (OHL), supported on steel lattice towers between the existing Whistlefield Substation, located north-west of Garelochhead, and the existing Dunoon Substation located west of Sandbank, on Holy Loch, a short distance north of Dunoon.

The existing OHL, west of the Loch Long crossing is supported by metal lattice towers which are of an old design and coming towards the end of their operational life. Electrical faults associated with high winds occur on the line relatively frequently. This is due to the old design of towers and the very steep and exposed terrain crossed by the existing OHL . Studies and various attempts to eliminate the faulting have been unsuccessful, due in part to engineering limitation on modifications that can safely be made to the existing towers. As such, SHE Transmission have established a requirement to rebuild the OHL between the existing Dunoon Substation and Tower 15 to the west of the Loch Long crossing.

Due to the requirement to maintain a 132 kV electricity supply to Dunoon during construction, the replacement OHL will require development on a different alignment to the existing OHL. To ensure future secure supply to Dunoon and meet current standards the replacement OHL will utilise different support structures to the existing OHL. Once the new OHL is constructed and in service, the existing OHL will be dismantled and removed.

This Report on Consultation documents the consultation process which has been undertaken for the project between November and December 2020. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the Preferred Route.

This report describes the key responses received and provides detail on the actions proposed in response to the issues raised. The consultation process has confirmed that a combination of Route Options A2, B2 and C1 should be taken forward as the Proposed Route, within which further study will seek to identify alignment options. It is recognised that the Preferred Route runs through a sensitive environment with challenging terrain. However, the Preferred Route has been selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors, and will become the Proposed Route taken forward to the alignment stage of this project.

1. INTRODUCTION

1.1 Purpose of Document

Scottish Hydro Electric Transmission Plc (SHE Transmission) is proposing to construct a replacement 132 kilovolt (kV) double circuit overhead line (OHL) between the existing Dunoon Substation and Tower 15 to the west of Loch Long.

This Report on Consultation documents the consultation process for the project between November 2020 and December 2020, during the route option stage of the project. The programme of consultation was designed to engage with key stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the Preferred Route[2].

The report describes the key responses received and details the actions taken in response to the issues raised.

1.2 Document Structure

This Report on Consultation is structured as follows:

Part 1: Introduction - setting out the purpose of the Report on Consultation;

Part 2: Project Overview – outlines the background to the project and provides a description of the key elements;

Part 3: Consideration of Route Options – describes how the Preferred Route was identified;

Part 4: The Consultation Process – describes the framework for consultation and methods which have been employed;

Part 5: Stakeholder Consultation Responses and key issues - summarises the range of responses and key comments arising from the public consultation and documents the Statutory and Non-Statutory Consultees whom responded through the consultation process;

Part 6: SHE Transmission Responses to Consultation - describes how the comments and issues raised by Statutory and Non-Statutory stakeholders during consultation will be addressed; and

Part 7: Conclusions and Next Steps – provides a summary of the conclusions reached and actions going forward.

[2] Identified within the Dunoon to Loch Long 132 kV OHL Rebuild Consultation Document (October 2020), produced by SHE Transmission plc

2. PROJECT OVERVIEW

2.1 The Need for the Project

Scottish Hydro Electric Transmission Plc (SHE Transmission) is a wholly owned subsidiary of the SSE plc group of companies. SHE Transmission owns and maintains the electricity transmission network across the north of Scotland and holds a license under the Electricity Act 1989 to 'develop and maintain an efficient, co-ordinated and economical electricity transmission system in its licensed area'.

Dunoon is currently connected to the wider electricity grid network by a twin-circuit 132 kV double circuit OHL, supported on steel lattice towers between the existing Whistlefield Substation, located north-west of Garelochhead, and the existing Dunoon Substation located west of Sandbank, on Holy Loch, a short distance north of Dunoon (**Figure 1.1**). The existing OHL crosses Loch Long by a 1.4km span and passes between Transmission Network Operator areas; to the east of Loch Long it is maintained and operated by Scottish Power Energy Networks, to the west of the Loch Long crossing the it is within SHE Transmission's licenced area.

The existing Loch Long crossing was not consulted on as part of this project as the existing crossing is to be reconductored with the four existing special structures reused. The existing OHL to the east of the Loch Long crossing is not part of the project and therefore was not consulted on.

Electrical faults occur on the line relatively frequently during high winds, interrupting supply to Dunoon. This is due to the old design of towers and the very steep and exposed terrain crossed by the existing OHL. Studies and various attempts to eliminate the faulting have been unsuccessful, due in part to engineering limitation on modifications that can safely be made to the existing towers. As a result of the above, SHE Transmission have established a requirement to replace the OHL between the existing Dunoon Substation and Tower 15, to the west of the Loch Long crossing to ensure security of supply to Dunoon and reduce the potential for faults on the line.

2.2 Alternative Options Considered

A capability study was undertaken in February 2019 of the existing OHL to see if it was suitable for upgrading was previously carried out. The outcome of this study shows that almost half of the existing towers were in an unsatisfactory condition. Records for the existing OHL circuits show poor performance in terms of electrical faults that even refurbishing and reconductoring the existing OHL would not resolve. Therefore, in order to ensure security of supply and meet current standards, a new connection is required to replace the existing OHL.

A study was undertaken in September 2020 to assess the feasibility of underground cable and subsea cable options to provide a new connection. Due to the terrain of the area the installation of these solutions would prove challenging and result in increased risks compared to rebuilding the existing OHL. These solutions would also introduce maintenance challenges when compared to the rebuilding of the existing OHL; in the event of a fault on an OHL, the fault can be detected and rectified in a matter of days whereas a fault in an underground or subsea cable could potentially take months to fix which may compromise an electricity supply to Dunoon. In addition, the costs associated with these solutions would be significantly greater than the costs associated with the rebuilding of the existing OHL. Taking this into account SHE Transmission has determined that a double circuit OHL is the preferred technological solution for this project[3], replacing the existing double circuit OHL.

2.3 Preferred Technology Solution

While SHE Transmission has determined that a new 132 kV double circuit OHL supported on new support structures is the preferred solution, it is recognised that there may be potential environmental and technical considerations that require the use of alternative technology options for lengths of the preferred alignment. However, until a preferred alignment for the OHL has been identified and detailed assessments and consultations have been completed, the requirement or extent of any use of other technology options is not known.

[3] The consideration of other technology options may be required in areas where particular physical or environmental constraints are identified.

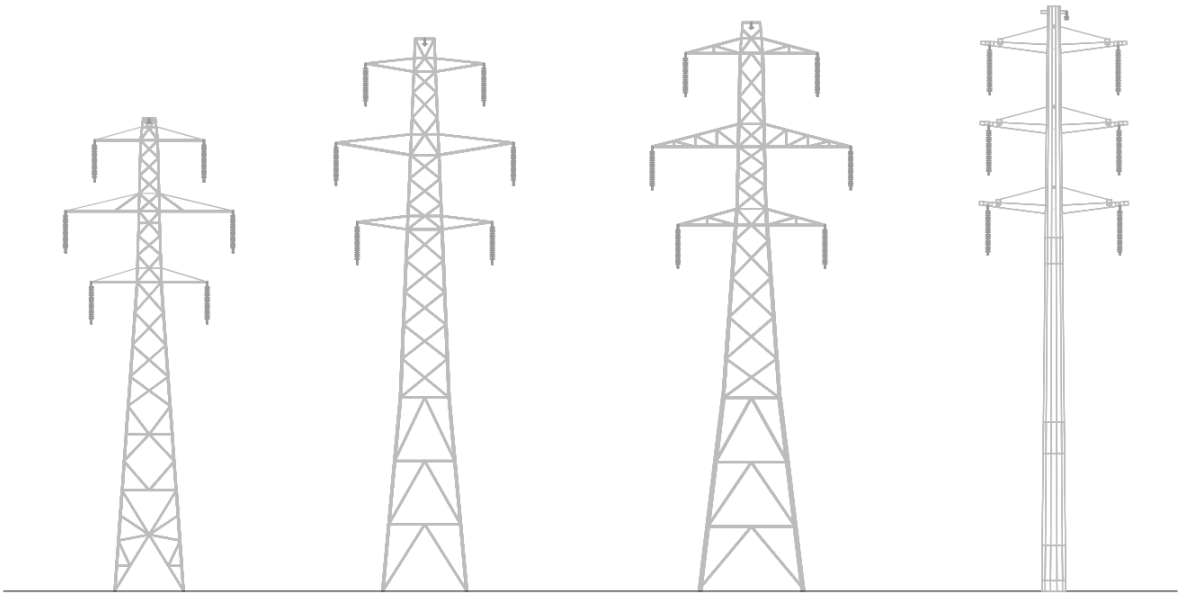
2.4 Proposals Overview

SHE Transmission is proposing to construct a replacement double circuit 132 kV OHL between the existing Dunoon Substation and Tower 15, the tower on the west side of Loch Long crossing. On energisation of the Proposed Development, the existing OHL will be removed.

The new double circuit OHL will be supported on support structures, either steel lattice towers or the new suite of transmission structure (NeSTS)[4] steel monopole design. It is assumed that, for either steel lattice towers or NeSTs, standard spans of approximately 300m would be achievable with these replacement structures and generally, this would allow for longer spans than the existing line (which has an average span of 220m), meaning fewer support structures are likely to be required for the replacement OHL. The height of the replacement structures, including potential extensions, is between 26-44m, compared to the height of the existing structures of approximately 22-35m. The height range is due to extensions which can be added to allow clearance of topographical features on the ground, and to maintain necessary ground clearance of conductors under all operation and weather conditions. Further assessment will be undertaken to determine the optimal design of the support structures.

The proposed steel lattice or NeSTs will support six wires on six cross-arms (three on each side) and an earth wire between the peaks, typical designs can be seen in **Plate 2.1**.

Plate 2.1 – Typical steel lattice tower design



2.5 Access during Construction

Vehicle access is required to each support structure location during construction to allow excavation and creation of foundations and erection of the support structure. Existing tracks would be used where possible and upgraded as required. Preference will be given to lower impact access solutions including the use of low pressure tracked personnel vehicles and temporary track solutions in boggy / soft ground areas to reduce any damage to, and compaction of, the ground. These journeys would be kept to a minimum to minimise disruption to habitats along the route. Temporary access panel solutions may also be used to protect the ground; however, temporary stone tracks are likely to be necessary in some areas depending on existing access conditions, terrain and altitude. Helicopters may also be used to reduce access requirements. All temporary tracks would be removed upon completion of the Proposed Development with land being reinstated to its former condition.

The requirement for and impact from new permanent access tracks for operation and maintenance of the new OHL will be considered during the next design phase of the project.

[4] https://www.nestsproject.co.uk/

3. CONSIDERATION OF ROUTE OPTIONS

3.1 Introduction

The Consultation Document[5] sets out the approach to the consideration and appraisal of route options, in line with SSEN's routeing guidance[6]. The guidance sets out SHE Transmission plc's approach to selecting a route for an OHL.

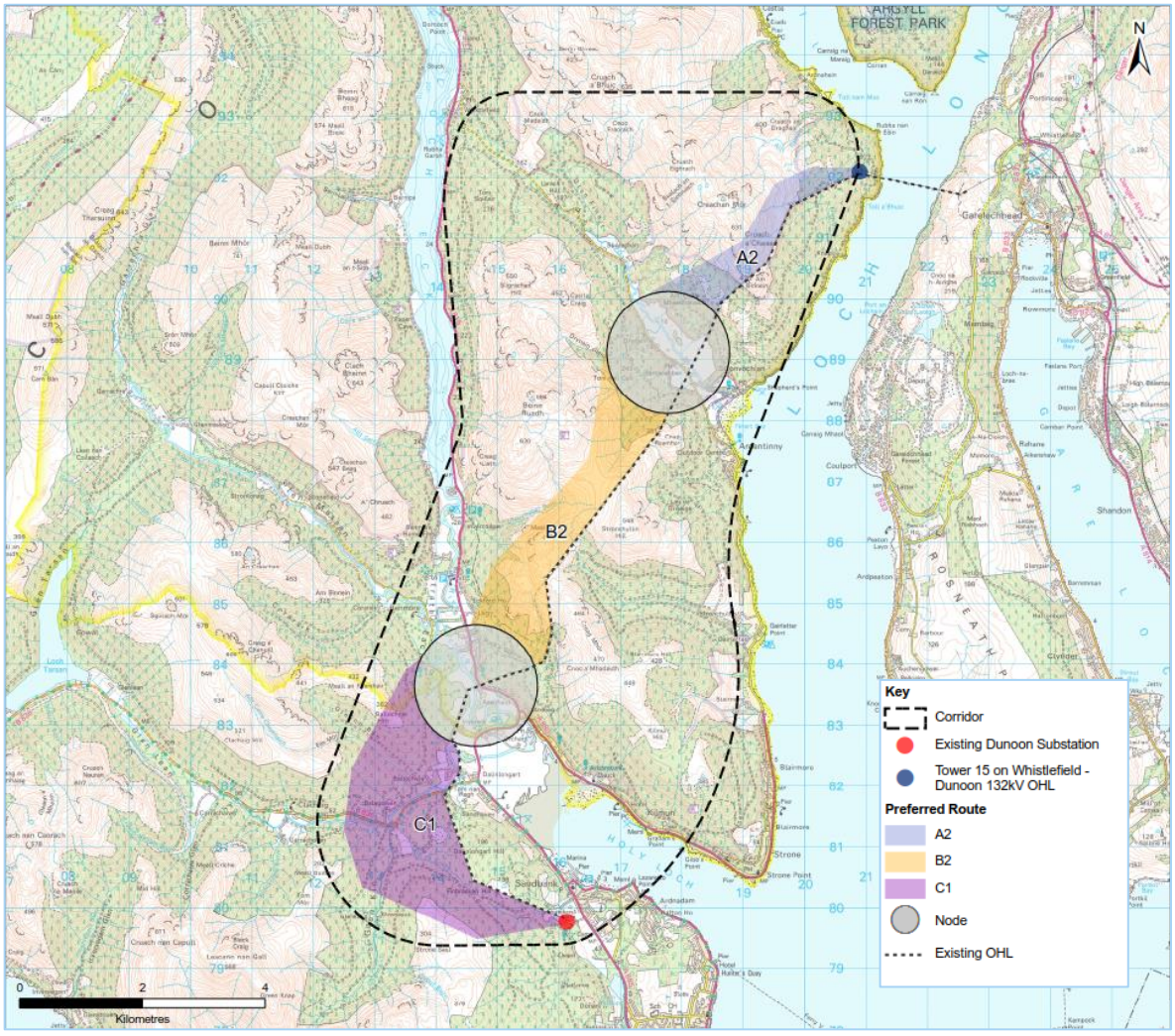
In line with the principles outlined in the guidance document, the method of identifying a Preferred Route has involved the following four key tasks:

- identification of the baseline situation;
- identification of alternative Route Options;
- environmental, technical and economic analysis of Route Options; and
- identification of a Preferred Route.

3.2 Identification of Preferred Route

The Preferred Route has been selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors. The Preferred Route is shown in **Plate 3.1** (see also **Figure 3.1**).

Plate 3.1: Preferred Route



[5] SHE Transmission plc (October 2020) Dunoon to Loch Long 132 kV OHL Rebuild Consultation Document

[6] SHE Transmission (March 2018), Procedures for Routeing Overhead Lines of 132kV and above

During the alignment selection stage of the project, alignment options within the Preferred Route will be carefully considered to achieve an acceptable alignment which seeks to minimise environmental effects. Confirmation of the preferred alignment will be informed by further consultation exercises, and through detailed surveys which may identify any additional and/or currently unknown engineering, environmental or land use constraints. Should further site and desk-based analysis at the alignment selection stage identify a particular constraint, a further review of route or alignment options may be required prior to the identification of a Preferred Alignment.

4. THE CONSULTATION PROCESS

4.1 Introduction

In accordance with the SHE Transmission guidelines a process of consultation on the Preferred Route option was implemented. This section identifies the methods of consultation and the key dates when consultation took place.

4.2 Methods of Consultation

The following methods were used to consult on the Preferred Route, as set out below.

4.2.1 Consultation Document

The Dunoon to Loch Long 132 kV OHL Rebuild Consultation Document (October 2020) was produced detailing the selection process for the Preferred Route, taking account of environmental, economic and technical factors. The Consultation Document was made available for download in October 2020 from www.ssen-transmission.co.uk/projects/dunoon

Table 4.1 details the statutory and non-statutory stakeholders in receipt of the Consultation Document or otherwise informed of the website details:

Table 4.1: List of Statutory and Non-Statutory Consultees

Statutory Consultees	
Historic Environmental Scotland	NatureScot
Scottish Environment Protection Agency	Scottish Forestry
Loch Lomond and Trossachs National Park Authority	Argyll and Bute Council
Non-Statutory Consultees	
British Horse Society	Scottish Rights of Way and Access Society (ScotWays)
BT	Scottish Water
Civil Aviation Authority - Airspace	Scottish Wildlife Trust
Crown Estate Scotland	Scottish Wild Land Group (SWLG)
Defence Infrastructure Organisation	Visit Scotland
Fisheries Management Scotland	BAA Aerodrome Safeguarding (Aberdeen)
Fisheries - Local District Salmon Fisheries	Glasgow Airport
Joint Radio Company	Edinburgh Airport
John Muir Trust	Glasgow Prestwick Airport
Mountaineering Scotland	Highland and Islands Airports
NATS Safeguarding	West of Scotland Archaeology Service
Nuclear Safety Directorate (HSE)	Marine Scotland
RSPB Scotland	Transport Scotland

As a result of the Covid-19 pandemic it was not possible to make the Consultation Document available in hard copy at publicly accessible locations along the route. Instead landowners, residents and local communities were made aware, through various consultation promotion methods (see **Table 4.2**), of the Consultation Document which was made available via the dedicated project website. Updates were issued via email to project website subscribers, local community councils and ward councillors.

Feedback on the Consultation Document was requested by 4th December 2020.

Stakeholders were invited to provide feedback through the following methods:

- A series of questions were asked within the Consultation Document requesting comments on specific aspects of the project as follows:
  - Have we explained the need for this Project adequately?
  - Have we explained the approach taken to select the Preferred Route adequately?
  - Are there any factors, or environmental features, that you consider may have been overlooked during the Preferred Route selection process?
  - Do you feel, on balance, that the Preferred Route selected is the most appropriate for further consideration at the alignment selection stage?
- A feedback form was also provided on the project webpage allowing users to submit comments.

4.2.2 Public Consultations

Under normal circumstances, consultation on the project would involve public engagement events held in the local area and such events were planned. However, as a result of the Covid-19 pandemic these events could not be held due to the restrictions in place around social gatherings

To continue engagement on the project the public consultation events were held virtually. SHE Transmission developed an online consultation tool which allowed stakeholders to visit a virtual consultation room and view the project information at their leisure. The virtual platform was designed to enable stakeholders to experience the full exhibition from home on a computer, tablet or mobile device. It was designed to look and feel like a face-to-face consultation in a community hall, with exhibition boards, maps, interactive videos as illustrated in **Plate 4.1** and the opportunity to share views on the proposals.

Plate 4.1: Public Engagement Website Landing Page

As an alternative to face-to-face events which would normally be held, a live chat function was also available at advertised times to allow attendees to ask questions and get responses from the project team. The virtual platforms could be accessed from the project website where the consultation brochure was also available to view for those who preferred this format or if internet connection resulted in difficulty accessing the virtual room.

The virtual consultation was advertised using several methods as shown in **Table 4.2**.

Table 4.2: Summary of Consultation Promotion

Method	Recipients
Mail drop – Postcard	6,397 properties and businesses
Email to Stakeholders to advise of consultation	MSP, MP, Councillors, Community Councils
Press Advert	Circulation 3,000
Posters	Sandbank Village Hall, Sandbank Post Office, Blairmore Village Hall, Ardentinny Village Hall
Social Media	Various social media streams

A letter was sent to stakeholders on the 3rd August 2020 providing an overview of the project and advising of the upcoming consultation. This communication went to the Member of the Scottish Parliament (MSP) and Member of Parliament (MP) for the area, Councillors (Cowal) and Community Councils (Kilmun, Ardentinny, Lochgoil and Sandbank). A further communication was sent to these stakeholders on 19th October 2020 to advise them of the dates of the upcoming consultation and the different ways they and the public could engage with the team regarding the plans. A mail drop postcard was sent to houses and businesses in Dunoon (PA23 postcode) to be received around 19th October 2020. This contained brief information about the project, dates for the consultation and live chat events and contact information for the Community Liaison Manager. An advert promoting the consultation was placed in the Dunoon Observer on Friday 23rd October 2020. Social media was also used to raise awareness, a press release was issued, and details were posted on SHE Transmission social media platforms. Posters advertising the consultation and the Live Chat sessions were displayed in the local area.

4.2.3 Summary of the Virtual Engagement Event

The consultation period opened on Monday 2nd November and continued until Friday 4th December. All responses received during this time were considered by the project team and are included within this report. Stakeholders were able to view information about the project on the SSEN website, access to the virtual consultation room and complete the feedback form. Live chat sessions were held on Tuesday 3rd November 10am-12.30pm and 5 – 7.30 pm. A snapshot of the virtual engagement is presented in **Table 4.3** below.

Table 4.3: Virtual Engagement Snapshot

Category	Number
Unique page views of the virtual portal over the consultation period (2nd November – 4th December)	201
Visitors to SSEN project website since the first broad advertising of consultation on 19th October (Unique / Total)	361 / 471
Number of visitors asking questions during the live chat events	7
Completed feedback forms	13

Where requested, hard copies of the consultation brochure and feedback form were sent out if stakeholders were unable to view the information online. A number of stakeholders emailed the SSEN Community Liaison manager to request additional information about the project. These queries were responded to by the relevant members of the project team.

5. STAKEHOLDER CONSULTATION RESPONSES

In developing the Dunoon 132kV Overhead Line Rebuild Project, the technical, environmental, economic and geographic constraints on the design and safe operation of the assets along with views expressed by stakeholders are considered. Gathering views from a variety of stakeholders is vital to developing and shaping a solution that balances different views of stakeholders. To ensure transparency throughout the consultation process it is vital that the opportunity is provided to share feedback received from stakeholders on the Proposed Development.

5.1 Feedback forms

In response to this consultation, feedback has primarily been received via completed feedback forms. Some respondents also chose to voice queries and views via email, post or phone call. Written feedback from one member of the public was received after the closing date of the consultation. At the respondent's request, and with agreement from the project team, their comments are included within this report. The feedback was received prior to publication of the Report on Consultation and within a timeframe where inclusion was feasible.

Feedback was received from several parties stating that they would find it beneficial if there was a function to read other stakeholder's questions and answers. We have noted this comment and will investigate the possibility of facilitating this for future consultations.

Fourteen completed feedback forms were received. Where emails were received which raised questions, these were responded to directly and any topics raised are included in **Appendix A** – Summary of responses to Frequently Asked Questions .

5.2 Statutory and Non-Statutory Stakeholder Feedback

Table 5.1 details the respondents and the dates on which responses were received from stakeholders in response to the Consultation Document. **Table 6.1** (Section 6) provides a summary of statutory and non-statutory stakeholder feedback and SHE Transmission's response.

Table 5.1: Statutory and Non-Statutory Consultee Respondents

Consultee	Date Response Received
Historic Environmental Scotland	23/11/2020
NatureScot	17/11/2020 and 18/11/2020
Scottish Environment Protection Agency (SEPA)	20/11/2020
Scottish Forestry	26/11/2020, 03/12/2020 and 04/12/2020
Loch Lomond and Trossachs National Park Authority	16/11/2020, 20/11/2020 and 04/12/2020
Argyll and Bute Council	03/12/2020, 24/12/2020 and 12/01/2021
British Horse Society	01/12/2020
BT	11/11/2020 and 25/11/2020
Defence Infrastructure Organisation	01/12/2020
John Muir Trust	03/11/2020
Mountaineering Scotland	11/11/2020
NATS Safeguarding	29/10/2020, 05/11/2020 and 30/11/2020
Nuclear Safety Directorate (HSE)	11/11/2020
Scottish Rights of Way and Access Society (ScotWays)	02/12/2020 and 27/01/2021
Glasgow Airport	03/12/2020
Edinburgh Airport	17/11/2020
Glasgow Prestwick Airport	03/12/2020
Highland and Islands Airports	20/11/2020

Consultee	Date Response Received
Marine Scotland	02/11/2020
Transport Scotland	30/11/2020
Joint Radio Company	14/01/2021
Forestry Land Scotland	11/01/2021

All consultation responses received during the consultation period have been collated and summarised into a consultation register. This register remains an active document and will be updated on receipt of further consultation comment.

Whilst recognising that this consultation was not part of a formal EIA screening or scoping procedure, the statutory and non-statutory consultees gave informative responses and identified where an option may necessitate specialist survey or would require careful design or mitigation to avoid sensitive features.

Not every Route Option was given a response with consultees focussing on the Preferred Route and Route Options where they could anticipate a potential issue.

Please see **Table 6.1** for stakeholder feedback and SHE Transmission's response.

6. PROJECT RESPONSES TO CONSULTATIONS

6.1 Overview

This section of the report provides the responses from SHE Transmission to the questions and themes emerging from the public consultation and the responses provided by statutory and non-statutory stakeholders.

6.2 Consultation Responses

Table 6.1 provides a summary of the responses to the Consultation Document provided by statutory and non-statutory consultees. **Table 6.2** provides a summary of the Feedback Forms response themes. These are presented along with a reply from SHE Transmission, including how the project will be developed to take account of the comments provided, as it moves forward into the next phase of development.

Through the consultation process a number of comments have been raised which require clarification or further assessment. These points include additional detail on the potential alignment, recommendations for continued consultation with stakeholders, and the importance of various surveys and assessments for protection of environmental aspects as the project evolves. This process will remain inclusive, seeking further consultation where appropriate.

Table 6.1: Statutory and Non-Statutory Consultee Respondents

Stakeholder	Summary of Feedback	Response by SHE Transmission
Historic Environmental Scotland	For matters including unscheduled archaeology and category B and C-listed buildings seek information from Argyll & Bute Council's archaeology and conservation services. Consider that at this stage there is potential for part of the Preferred Route to cause significant adverse impacts on the setting of a scheduled monument in the vicinity of the development. However, it may be possible to mitigate these impacts by careful design. Further details regarding the potential impacts and potential mitigation which may reduce the level of impact provided in an annex including recommendations for further consultation as the project proceeds. Consider that the consultation material sets out the need for the project and approach to selection of the Preferred Route. Consider that no assets within Historic Environment Scotland's remit have been overlooked. <u>Detailed Annex</u> Annex provides comments further expanding on the above points, comments made are split into general comments, Zones, and a summary. The majority of impacts of the proposed OHL within the Preferred Route corridor (A2, B2, C1) would not be sufficiently significant to warrant an objection, with the exception of the node where the proposed OHL crosses Glen Finart; potential for significant adverse impact on the setting of Dun Daraich, fort, Glen Finart, Cowal (SM 9190). However, Historic Environment Scotland consider that at this stage there is sufficient scope for positioning within the Preferred Route such that impacts could be adequately mitigated. *Zone A* Comments focussed on Dun Daraich, fort, Glen Finart, Cowal (SM 9190). Considered that the existing OHL has an adverse impact on the setting of SM 9190and that a replacement OHL within route corridor A2 is also likely to have a significant adverse impact on this setting. It is acknowledged that the severity of that impact depends on where the replacement OHL would be positioned and that further environmental assessment should include visualisations. Historic Environment Scotland provided options to consider which may lessen the impact on SM 9190. Acknowledge that Route Option A3 is preferred on cultural heritage grounds, but that Route Option A2 has been selected as it has fewer overall impacts, however the potential impact upon SM 9190 should be factored into any final decision.	SHE Transmission have undertaken consultation with Argyll & Bute Council (as outline within this table). Further consultation with Argyll & Bute Council archaeology and conservation services and with Historic Environment Scotland will be undertaken at the alignment stage to seek to find an acceptable alignment that minimises potential effects on cultural heritage sites and assets. SHE Transmission acknowledge the potential for impacts on SM 9190, SM 5260, GDL 00056, SM 5260, SM 6552, SM 3894 and SM 3235 and these assets have been considered in the route options appraisal. Further environmental studies will be undertaken at the alignment stage which will consider the potential for impacts on cultural heritage sites and assets. It is considered that an acceptable alignment that minimises potential effects on cultural heritage sites and assets within the Preferred Route option can be found. SHE Transmission will continue to engage with Historic Environment Scotland through subsequent project stage, including discussion on potential mitigation. The use of visualisations to demonstrate the impact of a replacement OHL will be considered as part of the Environmental Impact Assessment forming part of the Section 37 Application.

Stakeholder	Summary of Feedback	Response by SHE Transmission
	Recommend further consultation is undertaken during the early stages of the route alignment process. *Zone B* Comments focus on Kilmun Collegiate Church, tower and burial ground (SM 5260) and Benmore (Younger Botanic Garden) (GDL 00056). Consider that a replacement OHL in Route Option A2 would raise issues for the setting of SM 5260. Consider that there is potential for the southern end of Route Option B2 to impact views from within GDL 00056. At this stage it is unlikely to raise significant issues and any increased impact should be assessed and mitigated if necessary. A visualisation would demonstrate the impact. *Zone C* Comments focus on Kilmun Collegiate Church, Adam's Cave, chambered cairn, Ardnadam (SM 6552), Dunlaskin Wood, platforms and charcoal production area (SM 3894) and Ardnadam, settlement, chapel and enclosure 215m W of The Larches (SM 3235). For these monuments and it is considered unlikely that a replacement OHL within the Route Option C1 would raise issues of national interest for the setting of these monuments.	
NatureScot	Consider the Consultation Document adequately explains the project and approach to selection of the Preferred Route. On balance consider the Preferred Route is the most appropriate for further consideration at the alignment selection stage. Provide further points for consideration on designated sites, protected species, freshwater pearl mussel (FWPM), ornithology, habitats and invasive non-native species. <u>Designated sites</u> Agree with the exclusion of Route Option AB1 due to the potential effects on the Loch Eck Site of Special Scientific Interest (SSSI). Natural heritage sensitivities in the marine environment will also need to be considered in future assessments. Craighoyle Woodland SSSI, which lies partially within the Preferred Route, could be affected by the proposal. Construction could have the potential to lead to an increase in sedimentation and pollution runoff to the Upper Loch Fyne and Loch Goil Nature Conservation Marine Protected Area (NC MPA).	The potential for impacts upon natural heritage assets and upon the Upper Loch Fyne and Loch Goil Nature Conservation Marine Protected Area were considered within the Consultation Document and will continue to be considered through future design stages and assessment work. Effects would be minimised through considerate construction design and the implementation mitigation to protect the marine environment through a suitable Construction Environmental Management Plan (CEMP). It is acknowledged that the Preferred Route could potentially impact Craighoyle Woodland SSSI. Further design work will seek to identify an alignment which avoids or minimises potential impacts to this designated site. If appropriate, mitigation will be considered and further consultation on this matter will be undertaken with NatureScot. SHE Transmission acknowledge the requirement for a survey license for undertaking FWPM surveys. It is

Stakeholder	Summary of Feedback	Response by SHE Transmission
	Protected species Welcome the proposals to carry out protected species surveys of the Preferred Route and provide reference to NatureScot published protected species advice. Freshwater pearl mussel (FWPM) Advise that a population of FWPM was recently discovered in the River Eachaig and may be present in other watercourses within the Preferred Route. NatureScot advise that a survey of FWPM should be undertaken and if FWPM could be affected a species protection plan including proposed mitigation measures should be prepared. FWPM surveys will require a survey licence from NatureScot. Provide reference to NatureScot FWPM advice note. Ornithology Confirm that consultation regarding the specific ornithology surveys is already underway and that black grouse leks may be present in the upland areas around Meall Dubh (NS15788615) and Stronchullin Hill (NS17008629). Recommend liaison with the Argyll Raptor Study Group and/ or RSPB. Habitats Advise that the area to be affected by the development and an appropriate buffer should be surveyed to Phase 1 standard and that habitats consistent with those on Annex 1 of the EC Habitats Directive together with UKBAP Priority Habitats should be mapped to NVC standard and accompanied by supporting quadrat information. Rare and scarce associated plant species should also be recorded. Recommend that peat probing is carried out at proposed tower locations within the peatland area to inform the design and layout process. Where avoidance is not possible, suitable restoration measures should be identified and implemented. Recommend consulting Scottish Forestry regarding tree/woodland felling. Invasive non-native species (INNS) Advise that several INNS are known to be present along watercourses, particularly the River Eachaig. INNS should be recorded during the surveys and INNS management, with specific method statements for each INNS, should form part of an Environmental Management Plan.	currently proposed that FWPM surveys, informed by NatuerScots FWPM advice note, are undertaken to inform the EIA stage of the project. Effects would be minimised through design, considerate construction and the implementation mitigation to protect the marine environment through a suitable CEMP, SHE Transmission's General Environmental Management Plans (GEMPs) and Species Protection Plan (SPP) which includes a specific FWPM SPP. Consultation is underway with the Argyll Raptor Study Group, RSPB and Scottish Forestry with regards to the scope of ornithological surveys and any relevant data they may hold. This consultation will continue and will inform the alignment stage. SHE Transmission acknowledge the need for Phase 1, NVC and INNS surveys to inform the project. It is currently proposed that the following ecological and ornithological surveys will inform the alignment stage: UK Habitation Classification (proposed to be up to 325m from alignment options), ornithology surveys and protected species habitat suitability surveys. The presence of INNS, rare and scarce plant species will be noted during these surveys. Should INNS be identified, specific method statements along with GEMPs for each INNS be prepared and will form part of the CEMP. In line with the SSEN's Routeing Guidance the presence and potential impact upon peat will continue to be considered as part of the alignment stage. SHE Transmission acknowledge the need to carry out peat probing surveys to inform the alignment stage. A peat probing survey will be carried on tower locations to inform design and layout. Where avoidance is not possible restoration measures will be identified and discussed with NatureScot.

Stakeholder	Summary of Feedback	Response by SHE Transmission
		Consultation with Scottish Forestry will be undertaken during the alignment and EIA stages of the project.
Scottish Environment Protection Agency (SEPA)	Advise that that SEPA have previously provided comments on this proposal (our ref: PCS/171561, dated 29 June 2020) and comments presented are in addition to those provided in PCS/171561 (which remain valid). It is possible that SEPA would have no objections to a route within Preferred Route, subject to further consultation as the project progresses and when water crossing points have been identified and peat survey results are available. Highlight the need to apply the principles found in SEPA's engineering regulatory method (WAT-RM-02) to minimise the number of water crossings at the next stage. Consider that it should be possible to minimise the impact construction on sensitive habitats by carefully micro-siting the pylons and other infrastructure away from areas of deep peat and groundwater dependent terrestrial ecosystems (GWDTEs). Advise that SEPA authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Recommended that consultation is undertaken with SEPA Water Permitting on the requirement for a Construction Site Licence (CSL). Advise that forestry removal, if required, is likely to be included in the activities licensed by the CSL as preparatory works. Provide reference to SEPA's Sector Specific Guidance: Construction Sites (WAT-SG-75). Engagement prior to any CAR application is recommended to ensure site design is not affected by pollution prevention requirements. Should the proposals be below the CAR thresholds compliance with CAR General Binding Rule 10 will be required. Recommend that consideration is given to what will become of construction materials after temporary access tracks are decommissioned. Advise that if aggregate can be reused without further treatment, it may not be classified as a waste product and if there is no certainty of reuse contact should be made with SEPA Waste Permitting for confirmation on the requirement of a licence or exemption under the Waste Management Licensing (Scotland) Regulations 2011. SEPA advise that the following statement of the Consultation Document: 'Consequently, it is unlikely that the construction phase would have an adverse impact on the water quality' suggests environmental risks may be being underestimated. It would be unusual for a project of this size not to	We welcome SEPA's previously provided comments which have helped inform the project and routeing process to date. SEPA's comments on the preferred route, water crossings, GWDTEs, peat, pollution and water quality impacts and environmental licenses are noted. A UK Habitation Classification survey will be undertaken to inform the alignment stage. The alignment stage will seek to avoid sensitive habitats, wherever practicable. In addition, peat probing will be undertaken to inform any future application for consent through the EIA. SHE Transmission will undertake consultation with SEPA on any potential environmental licences and pollution management as part of the alignment stage and to inform any future application for consent through the EIA. In addition, further environmental and engineering studies and consultation with SEPA will be undertaken at the alignment stage to minimise potential environmental effects where possible. A CEMP will be produced to support the Project and will include an incident management and response plan, which will set out the measures to minimise potential environmental impacts should an unexpected incident occur during construction. The design of the Project will seek to use existing access tracks, wherever possible. Where temporary access tracks are required, the CEMP will include measures, including SHE Transmission's GEMPs, to ensure that construction materials are reused wherever possible. SEPA's concerns that environmental risks relating to water quality being underestimated are noted. We acknowledge that the Proposed Development may result in adverse

Stakeholder	Summary of Feedback	Response by SHE Transmission
	result in some environmental incidents and SEPA consider an adaptable mitigation plan for environmental incidents is in place before works commence. Recommend that the requirement for environmental licenses for crushing, screening, or if required installations or processes, under The Pollution Prevention and Control (Scotland) Regulations 2012, is considered.	impacts on water quality and this will continue to be considered throughout the project as it evolves. As noted above, a CEMP will be produced to support the Project and will set out the measures to minimise potential environmental impacts.
Scottish Forestry	Consider that the project is adequately explained and welcome the opportunity to discuss the woodland impact of the proposal in more detail and consider it important to agree the scope and content of Woodland Management documents at an early stage. Advise that UK Forestry Standard and Scottish Governments Control of Woodland Removal Policy apply to this proposal. Consider it is unclear as to how the Ancient Woodland has been accounted for in the selection of the Preferred Route and state that this irreplaceable habitat should be considered in determining potential for Biodiversity Net Gain (BNG) and demonstration of 'No Net Loss' (NNL). Advise that the Native Woodland Survey of Scotland (NWSS) allows a desk top exercise to distinguish Plantation on Ancient Woodland Sites (PAWS) from existing Ancient Woodland. Highlight the Scottish Governments Control of Woodland Removal Policy. The policy lists the types of woodland where the intrinsic environmental value indicates a strong presumption against removal and where removal is justified, compensatory planting area must exceed the removed area. Advise that within Route Option A2 a low-density native woodland has been established as part of a wider woodland creation scheme and consider that further discussion on this is required. Advise that there has been an increase in the spread of Ramorum disease (*Phytophthora ramorum*) throughout the proposed Route Options and that bio security measures are required. A link is provided to further information. Advise that a number of Statutory Plant Health Notices (SPHNs) have been issued requiring the felling of infected larch stands and susceptible hosts within a 250m buffer zone. Activity will be increasing as a result of the SPHNs, including felling, restocking, road and track construction. Advise that Scottish Forestry is working in partnership with others to control invasive rhododendron and that Forestry Land Scotland (FLS) can provide information. Content that Route Option AB1 has been discounted due to impact on Loch Eck side SSSI and Benmore Garden Landscape. However, Scottish Forestry believe that insufficient information is available on Ancient Woodland to agree that the Preferred Route (A2, B2, C1) is the most appropriate.	Scottish Forestry comments and information on UK forestry guidance and policy, and their requirements are noted. Areas of Ancient Woodland, including the use of NWSS to distinguish between PAWS, native and near-native woodland, have been identified and considered within the alongside other environmental, technical and economic considerations in the appraisal and selection of the Preferred Route. It is considered that compared to the other route options, the Preferred Route provides the most opportunity to avoid and minimise effects upon Ancient Woodland, and potential to increase biodiversity by focusing on less natural and more heavily managed commercial woodlands. Therefore, it is considered that sufficient information is available on Ancient Woodland to inform the selection of the Preferred Route. The Craighoyle Woodland SSSI and forest habitat network linking to the SSSI is noted and the SSSI will be avoided at the alignment stage. The effect on the SSSI and forest habitat network linking to the SSSI will be considered during the development, appraisal and selection of a preferred alignment. SHE Transmission welcome the information that a low-density native woodland has been established as part of a wider woodland creation scheme within Route Option A2. Further information on this scheme has been received and this information, and further discussions, will inform the alignment stage.

Stakeholder	Summary of Feedback	Response by SHE Transmission
	Consider that, from a woodland perspective, joining the existing OHL to cross the Strath Eachaig Node is the best option. However further discussion on design and mitigation requirements is needed. Advise that Route Option B2 has potential to impact upon FLS recreation facilities, considered an important part of recreation provision within Argyll Forest Park, and Pucks Glen. Any felling would need to be considered in context of tree stability and its wider impact. Advise that Route Option A2 may start a process of building on the forest habitat network linking to the Craighoyle Woodland SSSI should the OHL travel through PAWS in this area.	BNG is a recent consideration along with the commitment to deliver no net BNG loss on SHE Transmission projects. The SHE Transmission award winning BNG optioneering toolkit has been developed to assist in informing the OHL routeing process and provides an additional criterion to be considered. At the point of the routeing assessment the OHL Routeing guidance was yet to include BNG. The OHL Routeing guidance now includes BNG. This latest guidance will be followed at the alignment stage. Consultation with Scottish Forestry regarding BNG on the project will be undertaken at the alignment stage. Information on the spread of Ramorum disease and Rhododendron ponticum throughout the corridor, measures to combat their spread, and the potential impact upon FLS land and recreation facilities are noted. Scottish Forestry's opinion that joining the existing OHL through the Strath Eachaig Node is the best option from a woodland perspective is noted. However, selection of a preferred alignment will be undertaken in line with SSEN's routeing guidance using a multi-disciplinary approach. Recreational facilities have been identified and considered alongside other environmental, technical and economic considerations in the appraisal of route options and selection of the Preferred Route. They will continue to inform the development and appraisal of alignment options and selection of a preferred alignment. In line with SSEN's routeing guidance forestry will be considered as in the development and appraisal of alignment options and will be further considered as part of the EIA as the project progresses. Scottish Forestry's concerns about the potential cumulative effect upon Craighoyle Woodland SSSI. Potential direct, indirect and cumulative effects upon the Craighoyle

Stakeholder	Summary of Feedback	Response by SHE Transmission
		Woodland SSSI will be considered during the EIA for the project. Further environmental and engineering studies and consultation with Scottish Forestry and FLS will be undertaken at the alignment stage and continue throughout the project to avoid or minimise potential effects on forestry and forest habitat where possible.
Loch Lomond and the Trossachs National Park (LLTNP)	Highlight LLTNP Overarching Policies, Natural Environment Policies 1-16 and Historic Environment Policies 1-8, details of which can be found on the LLTNP website. State that the LLTNP response is determined with respect to the LLTNP Aims. Consider that the project is clearly explained however consider that little information is provided on alternative technology solutions and the selection of a replacement OHL solution. Consider that further consideration should be given to potential alternatives approaches. <u>Landscape</u> Understand the approach to route selection but consider that inclusion of Biodiversity Net Gain (BNG) within the Consultation Document would have been useful. State that ensuring the Preferred Route selection represents the best landscape option is of importance. State that it is unclear how the varying sensitivity of Landscape Character Types (LCTs) and associated features have been considered and highlight the omission of references to Special Landscape Qualities (SLQ) of the LLTNP designation. Consider that the appraisal is not fit for purposes as it fails to account for the LLTNP SLQ and provides little information on the varying landscape and visual sensitivities along each route option. Consider the approach to assessing route options does not adequately consider all relevant landscape and visual interests. <u>Natural Heritage</u> Advise that significant felling is due to take place in the area to remove larch trees infected with Phytophthora ramorum and to reduce the risk of spread. This will require the construction of new forest roads, harvesting facilities as well as the upgrading of existing forest roads. Suggest there may be scope to minimise overall woodland land by micro-siting into areas felled due to Phytophthora and make use of new forestry infrastructure.	A meeting was held with the LLTNP to discuss in detail the consultation comments received, to outline SHE Transmissions response and to gather further information. The meeting was held on 4th March 2021. A copy of the minutes from the meeting are included in **Appendix B**. Comments regarding LLTNP Overarching Policies and LLTNP Aims are noted. The use of alternative technological solutions has been considered by SHE Transmission including use of an underground cable or subsea cable solution. As documented in Section 2 of the Consultation Document, an OHL Rebuild was considered the most appropriate solution to replace the existing OHL as due to the associated challenges and increased risks and costs associated land and subsea cabling compared to rebuilding the existing OHL. <u>Landscape</u> BNG is a recent consideration along with the commitment to deliver no net BNG loss on SHE Transmission projects. At the point of completing the routeing assessment the SSEN Routeing Guidance did not include BNG within the appraisal process. The SHE Transmission BNG optioneering toolkit has been developed to assist in informing the OHL routeing process and provides an additional criterion to be considered. This will be

Stakeholder	Summary of Feedback	Response by SHE Transmission
	Advise that approved Land Management Plans which will need to be revised by FLS to reflect the need to address Phytophthora ramorum. Recommend consultation with FLS to gain a better understanding of the extent of the Phytophthora felling and associated works to enable the cumulative impacts to be determined. Advise that strict biosecurity procedures will be required to ensure that Phytophthora ramorum and other tree pests/diseases and invasive species are not spread. *Biodiversity Net Gain* LLTNP are keen to work in partnership with SSEN to identify BNG opportunities and provide reference to the LLTNP biodiversity action programme (Wild Park). Advise that opportunities to deliver BNG on National Forest Estate land should be discussed with FLS. Provide reference to Trees and Woodland Strategy guidance. Advise that BNG may also be delivered through partnerships with organisations such as the Loch Lomond and The Trossachs Countryside Trust, and Argyll Fisheries Trust. Advise that significant proportion of the Ancient and Long-Established woodlands identified in the Ancient Woodland Inventory are recorded as non-native PAWS in the more recent and detailed NWSS. Recommend that this information be reviewed alongside collected field survey data to confirm the presence of irreplaceable woodland habitat. Note that the Biodiversity Net Gain report identifies that a combination of Route Options AB1, B3a and C2 as most likely to achieve No Net Loss of Biodiversity however these do not form part of the Preferred Route. Reference Scottish Government's Control of Woodland Removal Policy which has a strong presumption against the loss of UK BAP priority woodland types. State that a Phase 1 Habitat Survey should be undertaken of all affected habitats and an appropriate buffer to assess more distant effects and to inform any redesign or micrositing. Should Annex 1 of the EC Habitats Directive, Scottish Biodiversity List or potential GWDTE habitats be identified during surveys these must be subject to an NVC survey to inform the design process. State that where avoidance of protected habitats is not possible suitable restoration and/or compensation measures should be identified. Recommend exploring restoration of extensive areas of PAWS woodland with FLS.	incorporated to the appraisal of options going forward on the project. SHE Transmission acknowledge the importance of the landscape as a factor in the design and assessment of an OHL within the LLTNP. The potential landscape and visual impact of the OHL rebuild are a key considered in the development and appraisal during routeing using SSEN's Routeing Guidance and as part of the EIA. However, the potential landscape and visual impacts will be taken into consideration with other environmental, technical and economic factors to select a proposed alignment which is economically viable, technically feasible, minimises impacts on important resources or features of the environment and reduces disturbance to those living in it, working in it, visiting it or using it for recreational purposes. LLTNPs comments on the varying sensitivity of LCTs and their associated features are noted. Any route between the two connection points (Tower 15 and Dunoon Substation) will cross a number of areas of different LCTs with subtly different characteristics, however these are all variations of a broader regional rugged hill and glen landscape character. It is acknowledged that although the LLTNP was considered as part of the appraisal, the LLTNP Evaluation of the Special Qualities (SLQ) of Loch Lomond & The Trossachs National Park nor the SNH (now NatureScot) Report on the Special Landscape Qualities of the Loch Lomond and The Trossachs National Park were explicitly addressed in the appraisal of Route Options. SHE Transmission has undertaken a review (see **Appendix C**) of the LLTNP SLQ, and it is considered that the information provided on the LLTNP SLQ is not considered to alter the conclusion on the Preferred Route documented in the Consultation Document.

Stakeholder	Summary of Feedback	Response by SHE Transmission
	Peat State that the presence of peat as shown in NatureScot Carbon and Peatland map 2016 highlights the importance of further assessment to identify the impacts and inform design. Expect peat probing to be undertaken and used to inform a peat slide assessment. Recommend early engagement with SEPA on peat. <u>Other Matters</u> Highlight other matters considered to be material as the project progresses including Scottish Planning Policy, public access rights and local communities, cumulative impacts, how construction access will be managed and if it will be included within the Section 37 application. States a preference for the use of existing tracks and for non-permanent methods such as trackway panels or access by helicopter. <u>Preferred Route</u> Believe that given the issues of how landscape has been considered in route selection the LLTNP cannot advise if the Preferred Route is the most appropriate in landscape terms. LLTNP Ecologist content that Route Option AB1 has been ruled out, however at the current stage there is not enough information available to identify a Preferred Route solely on ecological grounds. LLTNP Ecologist is generally content with the Preferred Route selected but notes that Route Option A2 and the Glen Finart node partially overlap with Craighoyle Woodland SSSI for which careful micro-siting and mitigation will be required to ensure that there is no adverse effect. Recommend that the potential impacts on the SSSI are discussed with NatureScot. LLTNP Ecologist notes that it will be challenging to identify a route within the southern node at the River Eachaig due to the presence of native and ancient woodland. Expects further landscape and ecological survey work will contribute significantly to the alignment of the proposed OHL and previously discounted route options may need to be reconsidered. Remain open minded to the most appropriate route until more detailed consideration is undertaken. <u>Conclusion</u> Summarises the points made throughout the main section of its consultation response and welcome further consultation.	It is considered that at this route selection stage a full analysis of the comparative sensitivities of the landscape would not have helped reach a different conclusion. Therefore, SHE Transmission consider that the appraisal is fit for purposes and adequately consider all relevant landscape and visual interests. <u>Natural Heritage</u> Comments provided on the removal of larch trees, works associated with removal of larch trees, amendments to Land Management Plans, other tree pests/diseases and invasive species are noted. FLS have been consulted with and responded to this consultation process. Further discussion is planned to be held as the project progresses to discuss opportunities for BNG, Phytophthora felling and potential cumulative impacts. <u>*Biodiversity Net Gain*</u> SHE Transmission welcome the invitation to work with the LLTNP to identify BNG opportunities on the project and will undertake further engagement on BNG. Comments on discussing BNG opportunities with FLS and the use of partnerships are noted. Comments on the presence of PAWS identified as Ancient and Long-Established woodlands identified in the Ancient Woodland Inventory is noted. The survey of habitat at alignment stage will be surveyed using the UK habitat classification survey technique and will capture the habitat along identified alignments, including an appropriate buffer. This collected information will be reviewed alongside the NWSS to inform the appraisal of identified alignments. It should be noted that the inclusion of BNG into the appraisal is considered alongside the other environmental, technical and economic criteria in the unweighted and

Stakeholder	Summary of Feedback	Response by SHE Transmission
		multifactorial process. Therefore, the Route Option containing the least baseline biodiversity units may not have necessarily been the Preferred Route Option. This can be seen by the response from the LLTNP Ecologist whom is content that Route Option AB1, identified as a preferred route in the BNG report, is ruled out. The Scottish Government's strong presumption against the loss of UK BAP priority woodland types is noted. Where avoidance of sensitive habitats, including UK BAP priority woodland, is not possible restoration and/or compensation measures will be identified and discussed with NatureScot, LLTNP and other relevant stakeholders. *Peat* As part of the alignment stage further assessment of peat, including peat probing, will be undertaken. This information will be discussed with SEPA and will inform the subsequent design and the requirements for further assessment (including the requirement for any peat slide assessment) during the EIA stage of the project. <u>Other Matters</u> Comments on other matters LLTNP considered material to the project are noted. These matters will be given consideration during the alignment and EIA stages of the project, where relevant. The design of the Project will seek to use existing access tracks, wherever possible. Where new tracks are required, these will be detailed and explained in the EIA Report. Where temporary tracks are required, the EIA will identify mitigation, including restoration. <u>Preferred Route</u> LLTNPs comments on the Preferred Route are noted. As documented in the Consultation Document it is considered that from a landscape and visual perspective *'on balance a*

Stakeholder	Summary of Feedback	Response by SHE Transmission
		route which utilises Route Options A2 and B2 would be preferred as they would not introduce an OHL into a currently unaffected area of landscape and they avoid the more densely settled areas east of the existing OHL. However, this is on the understanding that an alignment can be found that avoids an unacceptable effect on Puck's Glen'. The alignment stage of the project will be informed by further landscape surveys and appraisal work. The LLTNP Ecologists comments on the Preferred Route are acknowledged and the Craighoyle Woodland will be avoided at the alignment stage. The effect on the SSSI will be considered during the development, appraisal and selection of a preferred alignment. Further consultation will be undertaken with NatureScot and other relevant stakeholders to help inform the alignment stage including identifying a route within the southern node at the River Eachaig. As noted above further landscape and ecology survey work is proposed to be undertaken to inform the alignment stage, with further work also undertake for the EIA stage of the project. SHE Transmission consider that the Preferred Route is the most appropriate route, as outlined in the assessment work undertaken to data and documented in the Consultation Document. SHE Transmission appreciate the importance of working in partnership with LLTNP and propose to undertake further detailed discussions on the points raised by LTTNP during this consultation exercise and to inform the project going forward.
Argyll and Bute Council	State that any future proposals will require to be considered against the adopted Local Development Plan (LDP) Planning Policies and Wider Policy Framework. Provided a list of LDP and Supplementary Guidance policies considered relevant and other material planning policy documents considered relevant.	SHE Transmission will prepare a consenting strategy and will seek a formal scoping opinion on the environmental information to be provided within the EIA forming part of the application for Section 37 consent.

Stakeholder	Summary of Feedback	Response by SHE Transmission
	State that any route option proposed as part of a Section 37 application should have regard to any specific land use allocations within the adopted LPD 2015 and emerging LDP 2. States that future proposals would be a Section 37 application and highlights Schedule 9 requirements. Notes that this infrastructure is generally supported by NPF3, SPP, LDP and other policies of the Council but this does not detract from the need to ensure that significant environmental and landscape impacts are minimised, any potential impacts on sensitive receptors are carefully considered and that appropriate mitigation of any impacts is proposed. A landscape sensitivity evaluation of the landscape of Argyll and Bute to absorb windfarm development which provides valuable baseline information in respect of landscape qualities, sensitivities and transitional landscape areas where sensitivity can be increased. Consider that the project is adequately explained. Provide a list of planning matters it considers are required to be considered in detail in respect of any future Section 37 Application. This includes compliance with the Settlement Strategy; the location, nature and design of Proposed Development, potential Impacts upon the natural environment, fresh water and marine environment, woodland (including any necessary replanting), settlements, landscape character/sensitivity, visual and/or noise impacts on sensitive receptors; historic environment and archaeological matters; road network, core paths and associated transport matters; and any other relevant planning considerations as may be raised by consultees or third parties or as may arise as part of consideration of the application. Only provide comment upon sections of the proposals which sit within the Argyll and Bute Council Planning Authority Boundary. Other matters which are material to the decision by Scottish Ministers will be addressed, by other consultees such as HES, SEPA, Scottish Water and SNH with additional material considerations from a planning stance also input from local community groups and other third parties. Note that Route Options AB1, B2, B3a and B3b feed into the Argyll and Bute Council boundary from the LLTNP and that Route Options C1 and C2 are within Argyll and Bute Council Area. State that the objective should be to utilise existing topography and careful consideration of individual tower placement to mitigate to the maximum impacts of towers as the line transverses the B836 and its landscape setting. Consider that moving the line further away from the more prominent and open coastal views of Route Option C2 the most appropriate approach and note that containment of short and medium impacts of towers are potentially mitigated by existing stands of commercial timber within Route Option C1 and,	It is noted that the emerging LDP 2 may need to be considered alongside the Adopted LDP, which will continue to be considered as the project evolves, and we acknowledge the presence of the landscape sensitivity evaluation work the Council has undertaken. We will utilise this information and prepare a landscape and visual assessment as part of the EIA report. At the alignment stage, potential alignment options for further consideration will be developed taking into consideration environmental and engineering considerations including the use of existing topography. Further survey will be undertaken to identify sensitive receptors and that the preferred alignment avoids and/or minimises potential environmental impacts, where practicable. A Scoping Report will be prepared to confirm the matters to be assessed in the EIA. The list of planning matters provided by Argyll and Bute Council is acknowledged and will be considered as part of any future Section 37 Application. Comments regarding Route Option C1 landscape and visual matters (including mitigation planting and minimising skylining) are noted and these will be considered at the alignment stage.

Stakeholder	Summary of Feedback	Response by SHE Transmission
	to an extent, by local topography. Proposals should ensure that appropriate localised tree planting to mitigate views from the B836 are undertaken. Consider that within Route Option C1 routing/tower placement should seek to minimise skylining which could be visible from across the Holy Loch within the LLTNP boundaries and from the A880. Consider that increased scale and height of new towers makes this matter an essential component.	
British Horse Society	Seek to engage with local riders to make them aware of project and request to be copied into to future consultation. Provided guidance to drivers of large vehicles.	The guidance provided is noted and SHE Transmission will undertake consultation with the British Horse Society as part of the alignment stage.
BT	Studied the proposal with respect to EMC and related problems to BT point-to-point microwave radio links. BT conclude that the Route Option A2 will cause interference to BT's current and presently planned radio network. At present, BT would object. Advise that ideally a 100m minimum clearance from the structure to the link path is needed and that Route Options B2 and C1 pass the 100m infringement zone. Provided end link co-ordinates to SSEN.	SHE Transmission has reviewed the provided information, which will be considered further as part of the alignment stage, and are satisfied that alignment options within the Preferred Route present minimal risk to interference with BT's current and presently planned radio network. Consultation with BT will be undertaken early within the alignment stage to gather comments on potential alignment options.
Defence Infrastructure Organisation	Advise that the route options fall within the Ardgarten Training Area and the statutory safeguarding explosives zone surrounding DM Glen Douglas and Coulport. Would like to be kept informed as the proposals progress.	The presence of the Ardgarten Training Area and the statutory safeguarding explosives zone surrounding DM Glen Douglas and Coulport are noted. SHE Transmission will undertake consultation with the Defence Infrastructure Organisation as part of the alignment stage.
John Muir Trust	Email acknowledgment and statement of intent to respond however no further responses received to date.	None required
Mountaineering Scotland	Consider that the reasoning behind this assessment is adequately explained. Advise that Beinn Ruadh is a Graham and as such will be a recreational destination for hillwalkers which should be considered as a factor at subsequent stages. Draw attention to the reinstatement of the landform after the removal of temporary tracks. Consider that any new tracks required should be given detailed justification and highlight that natural regeneration in the area will be of a different character and pace than what would be expected in areas with deeper, richer and more sheltered soil profiles.	The use of Beinn Ruadh as a recreational destination for hillwalkers is noted and will be taken into consideration during the appraisal and selection of a preferred alignment. The design of the project will seek to prevent the loss of wild qualities of land and use existing tracks, wherever practicable. Where new tracks are required, these will be detailed and explained in the EIA Report. Where temporary

Stakeholder	Summary of Feedback	Response by SHE Transmission
	Suggest that an acceptable standard of restoration be specified in future method statements. Consider that the test of potential further loss of wild qualities of land lies within the EIA process where care and attention are given to initial groundworks; in layout and alignment of tracks, and in the stripping and storing of turves; in the reinstatement profiles and turf replacement.	tracks are required, the EIA will identify mitigation, including restoration.
NATS Safeguarding	No concerns identified on proposals. Request to be included in further consultation.	NATS Safeguarding will be included in consultation undertaken for the project at the alignment stage.
Nuclear Safety Directorate (HSE)	No comment to make on proposals	None required
Scottish Rights of Way and Access Society (ScotWays)	Confirm the potential to impact on formal and informal paths and access ways. Further information on formal and informal paths and access ways could be provided if required.	SHE Transmission requested additional information on formal and informal paths and access ways from ScotWays.
	National Catalogue of Rights of Way (CROW) shows that rights of way SA33, SA34 and SA37 are within the Corridor. Enclosed a RoW map showing these routes. Note that as there is no definitive record of rights of way in Scotland, there may be other routes that meet the criteria to be rights of way but have not been recorded. Note that right of way SA37 is used by Heritage Path HP416 and Heritage Paths HP109 and HP110 sit within the site boundary. ScotWays Heritage Paths project promotes these routes for their historic interest and enclosed a map showing these routes. Note that routes using rights of way SA34 and SA37 are described in ScotWays' book Scottish Hill Tracks as HT94 Scottish Hill Track route number 95 and HT95 Scottish Hill Track route number 96 and enclosed the HT map. Recommend consulting the Core Paths Plan, prepared by the access team at Argyll and Bute Council. State that recreational routes may be affected by the Preferred Route and request that these routes remain open and free from obstruction during and after any proposed work. State that, depending on the finalised route options, it may be necessary to provide an Access Management Plan to ensure continued public recreational access during the construction phase. Recommend that Argyll and Bute Council is consulted regarding any measures required to be put in place if work is required within the vicinity of the promoted routes.	The information provided by ScotWays, including the specified National Catalogue of Rights of Way are noted and are not considered to alter the selection of the Preferred Route. This information will be considered further at the alignment stage. An Access Management Plan will be prepared to accompany the CEMP where applicable. This plan will be implemented during the construction phase, where works are in the vicinity of promoted routes. SHE Transmission have undertaken consultation with Argyll & Bute Council (as outline within this table) and will continue to do so as the project progresses.

Stakeholder	Summary of Feedback	Response by SHE Transmission
Glasgow Airport	No comment, further consultation not required.	None required
Edinburgh Airport	Falls out with the Aerodrome Safeguarding zone for Edinburgh Airport. No comment on the proposal.	None required
Glasgow Prestwick Airport	Satisfied there is no aviation safeguarding impact on Glasgow Prestwick Airport.	None required
Highland and Islands Airports	No impact on the safeguarding criteria for any of the Highlands and Islands Airports Limited airports.	None required
Marine Scotland	Provided generic scoping guidelines which outline potential impacts on freshwater and diadromous fish and fisheries from development projects. Provided two documents which provide standard advice to ECU attached to the email response.	The Marine Scotland generic scoping guidelines are noted, and Marine Scotland will be included in consultation undertaken for the project as it progresses.
Transport Scotland	Consider that none of the possible routes will have any direct impacts on the trunk road network given the distance of the three route options from the A83(T). No further comment to make on the alignment of the Proposed Routes. Guidance provided on the assessment of traffic impacts including abnormal loads as part of any EIA and on traffic management plans.	Guidance on the assessment of traffic impacts and traffic management plans are noted and will be considered as part of the EIA.
Joint Radio Company	Three Links; Sandbanks, Dunoon Grid, and Loch Fyne to Scroggi Bank identified as having the potential to interact with the Proposed Development. Consider that at this stage the links would be acceptable however pylon positions will need to be checked to ensure no conflict. Once the alignment has been determined please consult further with the Joint Radio Company.	SHE Transmission notes the information provided on the Joint Radio Company links. This information will be taken into consideration during the development of alignment options. Further consultation will be undertaken as part of the alignment stage.

Stakeholder	Summary of Feedback	Response by SHE Transmission
Forestry Land Scotland (FLS)	Advise that FLS is a new standalone government agency independent from Scottish Forestry responsible for looking after Scotland's National Forest and Land (NFL). It is not a regulator. Advise that FLS' work revolves around the Land Management Plan (LMP) process which aims to set out the direction of how a given area of land will be managed in the coming 10 years. FLS have several LMPs currently being re-drafted for new 10-year periods which overlap with the Preferred Route and early engagement would help to avoid conflict or obstacles. Advise that several issues currently affecting LMPs on Cowal include felling work required to address infected larch, and associated removal of non-natives such as western hemlock and rhododendron. New clearances need to include plans of action and resources to manage these. Advise that a large swath of Cowal is within a red squirrel stronghold and FLS are considering the impact of larch felling on this species. FLS have remit in undertaking bog restoration work and we would like to avoid potential obstacles or complications. FLS are required to maintain percentages of native woodland, undertake restoration of ancient woodland, maintain continuous cover of woodland for landscape and stability reasons. FLS note that there are opportunities that a holistic approach would present for improvement in biodiversity, habitat connectivity and landscape impact mitigation. FLS would like to initiate detailed conversations in relation to the project.	SHE Transmission acknowledge that discussion with FLS is required to identify potential conflicts and opportunities between the project and FLS ongoing activities, including updating the LMPs, control of invasive and potential to improve biodiversity, habitat connectivity and landscape impact mitigation. SHE Transmission will undertake discussion with FLS at the start of the alignment stage to discuss these further and will continue engagement with FLS as the project progresses. A meeting was held with FLS to conflicts and opportunities between the project and FLS ongoing activities on 5th January 2021.

Table 6.2: Feedback Form Responses

Summary of Feedback	Response by SHE Transmission
Queries about the merits of tower type for the proposal development. Overall, the choice of tower structure indicated no overall preference. 62% of respondents stated a preference for NeSTS, as NeSTS were considered less obtrusive in the landscape, more aesthetically appealing and may have a reduced 'footprint', and 15% stated a preference for pylons, as pylons were considered less visually intrusive where they may break the skyline. Remaining responses state that the choice of tower structure would be load dependent for new line and conductors, and that at this stage it would not be possible to have a realistic indication of what the visual impact would be on the landscape setting.	The range of responses regarding the merits of the different tower type options are noted. The selection of tower type will be confirmed for the EIA stage. Tower types will take into consideration engineering technical factors i.e. ensuring that the tower types are suitable for the location, load and other design aspects, and environmental considerations to ensure that the tower types minimise potential impacts. The EIA will include a Landscape and Visual Impact Assessment. As part of this assessment, a series of photomontages will be produced from locations agreed with Argyll and Bute Council and other stakeholders. The photomontages will present a photo-realistic view of what the project will look like in the view from the selected locations and will include the proposed tower types.
69% of responses stated their preference for the Preferred Route (Options A2, B2 and C1). Reasons listed included: • Avoiding runoff to Loch Eck SSSI and avoiding the designed landscape of Benmore Botanic Gardens and its essential setting. • Following existing route minimises environmental impact and need for new access roads. Local involvement needed as scheme progresses with respect to nodes.	Comments are acknowledged. Route Option A2, B2 and C1 remains the Preferred Route. It is acknowledged that local involved is required as the project progresses. Further public exhibitions and consultations will be undertaken during the alignment and EIA stages and feedback from stakeholders will inform the work undertaken.
Comments raised concerns about the effect on the landscape character and visual amenity of the area. Comments on this topic included: • impact on the existing landscape setting, particularly around Strath Echaig; • structures being intrusive in the landscape and where they break the skyline; • height of structures compared to the existing ones; • proximity to property; • impact the high scenic value of the area from Inverchapel to Puck's Glen; and • impact on recreational routes and the Benmore Botanic Gardens.	The potential for landscape and visual impacts associated with the OHL has been given due consideration in the selection of the Preferred Route and will be further assessed, including the matters raised in the feedback, during the alignment selection stage of the project to seek to identify a preferred alignment which avoids and/or minimises potential landscape and visual impacts. At the EIA stage, a full Landscape and Visual Impact Assessment will be undertaken to identify potential impacts and, where appropriate, propose mitigation.
Concerns about the clarity of information available during the consultation process related to: • clarity of the consultation material; • clarity around the selection of NeSTS; and • additional details regarding the nodes.	SHE Transmission is committed to continued engagement with the local community and further consultation events will be held in the local area as the project progresses, and in line with Government guidance in relation to Covid-19 at the time. Comments in relation to the presentation of information will be taken on board for future consultations.
The point was made repeatedly that commenting on / supporting / objecting on a 1km wide route is very difficult if not premature. These concerns cited the need for	SSEN's routeing guidance seeks to establish the alignment of an OHL through a robust and systematic approach which seeks to engage early on in the design process with consultees to firstly obtain feedback on route

Summary of Feedback	Response by SHE Transmission
an exact alignment to understand the full potential effects of the line.	options at circa 1km width against a series of environmental, engineering and cost considerations. The aim of this early engagement is to obtain views of stakeholders on the Preferred Route before progressing to the alignment stage, where further consultation will be held.
Local involvement needed as scheme progresses	Engagement with local landowners will continue throughout the development stages of the project, including the alignment selection stage and subsequent EIA stage. This will seek to obtain the views of local stakeholders, which will be considered in the design and environmental assessment process, where required. The project land manager would discuss the wayleaves process and any arrangements required with affected landowners should the selected alignment cross over their land.
Concerns about the proximity of the Proposed Development to properties	Properties will be considered during the development, appraisal and selection of a preferred alignment which will be developed to ensure compliance with relevant industry design standards and guidance. Potential impacts upon properties will also be assessed further at the EIA stage. This will include, for example, assessments regarding Landscape and Visual impacts.
Environmental concerns were raised in relation to: • trees along the forestry road which may contain, Bats, Pine Martins, Owls and other significant wildlife; • the oak trees, lichen, fungi and wildlife habitat on the Dun Daraich fort site; • sensitive species within the River Echaig; and • the effect of tree removal on flooding.	These comments and environmental sensitivities are noted. The appraisal of route options has taken into consideration environmental consideration including ecological and flooding. Further assessment and surveys will be undertaken at the following alignment and subsequent EIA stages, as required, to seek an acceptable alignment that minimises potential environmental effects.
Concerns about the impact of the Proposed Development on tourist and recreation for the areas including access to the surrounding glens and trails between Craig Laith near Inverchapel and Pucks Glen.	Potential effects upon tourist and recreation facilities are considered within SSEN's routeing guidance and have been taken into consideration during the appraisal of route options. We will continue to be considered at the following alignment and subsequent EIA stages, as required. It is anticipated that impacts upon recreational access would be mitigated via measures included in a CEMP to seek to maintain access routes during construction, as far as practicable.
Concerns about the scale of construction, noise, access on the existing road and the affect residents.	The alignment stage will seek to identify a preferred alignment which minimises the effects upon local residents. Potential construction impacts, including noise and traffic and transport, will be assessed at the EIA stage and suitable mitigation proposed including a CEMP, where appropriate.
Queries about the merits of running the line underground were also raised by residents.	As state in Section 2.2 and 2.3 of this report, undergrounding the entire circuit was discounted as in the event of a fault, an underground cable could potentially take months to fix. However, it is recognised that there may be potential environmental and technical considerations that require the use of alternative technology options for lengths of a preferred alignment.

7. CONCLUSIONS AND NEXT STEPS

7.1 Summary

This Report on Consultation documents the consultation process which has been undertaken for the project between November and December 2020. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the Preferred Route.

This report describes the key responses received and provides detail on the actions proposed in response to the issues raised. The consultation on the route selection process has been successful in obtaining a large amount of feedback from both statutory and non-statutory consultees.

The responses provided agree with the discounting of Route Option AB1 to avoid the sensitive areas of Lock Eck SSSI and the Benmore Botanic Gardens. The majority of responses preferred a route in close proximity to the existing OHL and the majority of responses included agreement on the Preferred Route. The responses provided highlight the requirement to balance different sensitivities and receptors in selection of the Preferred Route; for example Historic Environment Scotland acknowledge that although Route Option A3 is preferred on cultural heritage grounds, Route Option A2 has been selected as part of the Preferred Route taking into consideration other environmental, technical and economic factors.

A number of stakeholder responses provided useful information or references to further material to be considered. Where additional information provided had the potential to impact upon the selection of a Preferred Route this information was reviewed, see **Appendix C**, and has factored into the selection of the Proposed Route.

Several responses referred to concerns regarding specific receptors and their comments will be incorporated in the further assessment work to be undertaken. The points raised include the need for additional consideration of the potential impacts upon specific receptors or areas, the need for further environmental information, recommendations for continued consultation with stakeholders, and the importance of various surveys and assessments for protection of environmental aspects as the project evolves.

To address these points, the following actions are being undertaken:

- Alignment options will be developed and will consider appropriate technological options along the Preferred Route, as well as construction access solutions. The results of these studies will be reported at Alignment Selection (Stage 3);
- Further environmental survey and assessment work will be undertaken in parallel with the engineering studies to enable a collaborative approach in seeking to identify a preferred alignment through this sensitive landscape and environment. In particular, this will involve further survey effort and advice relating to landscape and visual, ecology, ornithology, hydrology, peat, soils, forestry and cultural heritage matters. The results of these studies will be reported at Alignment Selection; and
- Further consultation will be organised with key statutory and non-statutory consultees, local councillors and local communities to provide updates on the project during the alignment stage. This will include addressing comments relating to the provision of information during the consultation process. Formal consultation will be organised on completion of the alignment studies to enable comments from stakeholders to be sought on the preferred alignment identified.

All comments and considerations to date will be taken forward into the alignment stage, through which assessments will be carried out for all relevant environmental aspects. This process will remain inclusive, seeking further consultation where appropriate.

The consultation process has confirmed that a combination of Route Options A2, B2 and C1 should be taken forward as the Proposed Route, within which further study will seek to identify alignment options. It is recognised that the Preferred Route runs through a sensitive environment with challenging terrain. However, the Preferred Route has been selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors, and will become the Proposed Route taken forward to the alignment stage of this project.

Detailed analysis of potential alignment options within the Proposed Route and consultation feedback and will focus on finding an alignment that avoids or minimises potential environmental impacts referred to in **Table 6.1** above.

7.2 Next Steps

The project will now be taken into Stage 3 (Alignment Selection), commencing with identification of alignment options within the Proposed Route. These will be informed by this and further consultation exercises, and through detailed surveys, which may identify any additional and/or currently unknown engineering, environmental or land use constraints.

Members of the public and other interested stakeholders will be invited to participate in another consultation on the Preferred Alignment in spring 2021, before the alignment is finalised for the purpose of seeking the necessary consents and permissions under the Electricity Act 1989. The anticipated programme is as follows:

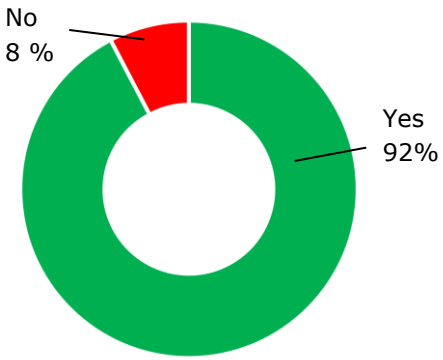
Spring/ Summer 2021	Alignment selection between Tower 15 and Dunoon Substation to select a preferred alignment and tower positions.
Spring/ Summer 2021	Consultation on the Preferred Alignment.
Summer 2021	Request for EIA scoping opinion.
Autumn/ Winter 2021	Finalise design to make applications for necessary consents and permissions.
Winter 2021 and Spring 2022	Prepare EIA Report and make Section 37 application.

We will continue to engage with the local community, Community Councils, elected representatives, statutory and non-statutory stakeholders through the project.

APPENDIX A: SUMMARY OF RESPONSES TO FREQUENTLY ASKED QUESTIONS

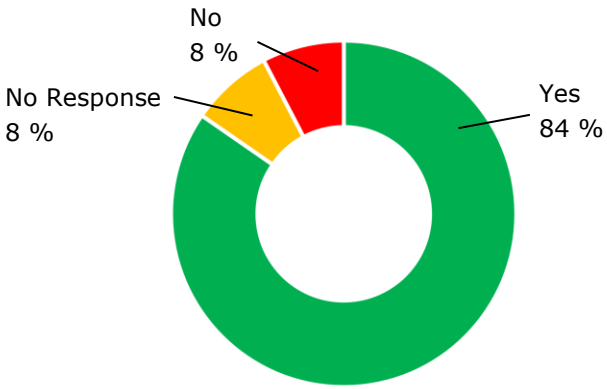
The following section collates information received in the feedback forms in response to this consultation.

Q1: Has the requirement for the Dunoon 132kV Overhead Line Rebuild Project been clearly explained? (Yes, No, Unsure)



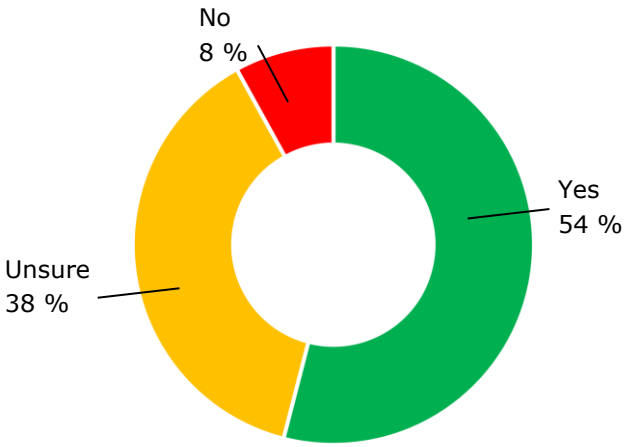
Of the 13 feedback forms received, only one respondent (8 %) stated that they did not think that the requirement had been clearly explained.

Q2: In your opinion, has a clear overview of the required project elements been provided?



84 % (11 of 13 feedback forms in total) of the respondents stated that they do think that a clear overview of the required project elements has been provided. One respondent stated that this element was not clear, and one participant did not respond to this question.

Q3: Do you agree with the preferred technology solutions which have been identified (Nests and Towers)?



Seven respondents (54 %) stated that they do agree with the preferred technology solutions which have been identified. When asked to explain their response, the following comments were received:

- Two solutions have been explained. However, towers are then identified as the only reliable option due to height required.
- The towers will be load dependent for new line and conductors.

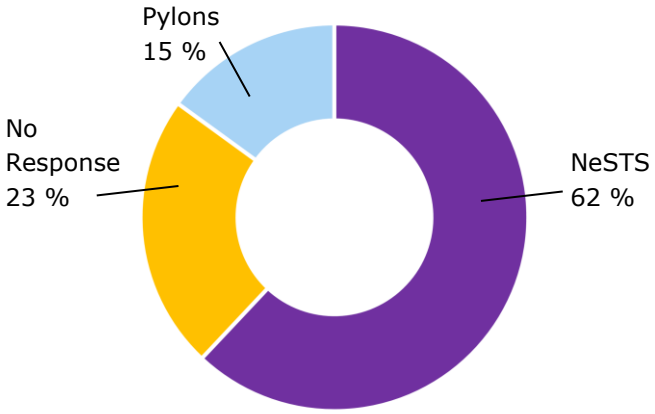
Only one respondent stated that they do not agree with the preferred technology solutions, and the following reason was given:

- Some of the consultation material was unclear and difficult to understand.

Five respondents stated that they were unsure whether they agreed with the preferred technology solutions which have been identified. The reasons stated for this included:

- Not being qualified to comment.
- NeSTS towers look fine on paper but not sure how they would look on the ground.
- It is unclear which tower type option is preferred. The selection of NeSTS appears to be in doubt because it is new technology in Scotland.
- Not aware if there are any other options besides those shown.
- It is not possible at this stage to have a true reflection of what the visual impact the Proposed Development will have on the existing landscape setting, particularly around Strath Echaig.

Q4: Do you have any preference between the two preferred technology solutions identified? (Pylons / NeSTS)



Over half the respondents (62%, 8 No.) stated that they would prefer NeSTS of the technology solutions identified. Two respondents (15%) stated their preference to be pylons. Those participants who stated this as their preference gave the following reasoning:

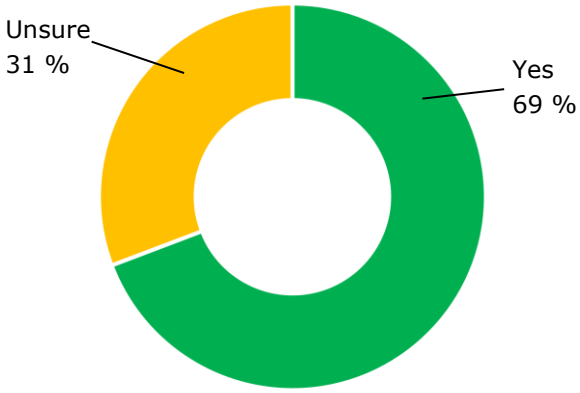
- Potentially less obtrusive in the landscape.
- Potentially have a reduced "footprint".
- NeSTS are aesthetically more appealing and different.

The reasons for a preference of pylons included that pylons looked less solid so are potentially less visually intrusive when/if they break the skyline.

Three participants (23%) did not respond to this question and provided information on their choice of response:

- Strong preference for the height to be similar to the existing ones and as small as possible.
- With current information it is impossible to have realistic idea of long-term visual impact of the Proposed Development on the scenic value of the Strath Echaig landscape setting.

Q5: Do you agree with our preliminary Preferred Route option (A2, B2, C1)? (Yes / No / Unsure)



The majority of respondents, 69% (9 No.) stated that they do agree. These respondents gave the following reasons for their answer:

- It avoids the sensitive areas of Loch Eck SSSI which could be impacted by runoff, it avoids the designed landscape of Benmore Botanic Gardens and its essential setting including 1870 big tree planting on east side of the Strath and the popular walking trails within that area.
- Following existing route is preferable. Further consideration is required in following stages to address possible constraints near the existing route. Following existing route minimises environmental impact and need for new access roads.
- Local involvement needed as scheme progresses with respect to nodes.

Four participants stated that they were unsure and gave the following explanation for their response:

- Concern due to proximity to property.
- Identified route options are too large; the impact of the Proposed Development would vary depending upon where, in each route option, it is located.
- Route Options C1 and AB1 considered preferred as these options are further away from habitation. However, unsure if these are within protected areas.
- The Proposed Development could follow more or less the route of the existing line.
- The Preferred Route A2, B2, C1 is almost certainly the best option but concerned that the route options allow (at this stage) too much leeway and have the potential for negative impacts on the high scenic value of the Strath Eachaig valley.
- More details are required regarding the nodes.

Comments were also raised about the proximity of Route Option B2 to the Pucks Glen Lodges Holiday Park, the Gorge Waterfall Trail of Pucks Glen and residential locations in this area. The existing route avoids these features and concern was expressed about the proximity of these to the Preferred Route. It was also noted for the same area that residents would not wish to see the existing pedestrian access on the 'old forestry road' altered by the Proposed Development. A preference was expressed for the Proposed Development in this area to following the existing line as closely as is viable.

Q6. Are there any identified routes you feel should NOT be progressed from any of the zones identified?

Most respondents made a comment in response to this question, these included:

- **With regard to route AB1:**
  - It passes through sensitive areas (Loch Eck SSSI, designed landscape of Benmore Botanic Gardens).
  - It is unfeasible due to terrain.
  - It is closer to residential areas and roads and therefore is potentially more visible.

- **With regard to route B2:**
  - Sections will need careful planning, particularly Inverchapel to Puck's Glen which is an area of high scenic value and outstanding recreational facilities to both local residents and visitors.
  - Alignments along the old forestry road, adjacent to Pucks Glen Lodges Holiday Park and the entrance to the Pucks Glen Waterfall trail, should be rejected because the felling of trees and large civil engineering works in this area would disrupt habitat containing Bats, Pine Martins, Owls and other significant wildlife and would limit access to the surrounding glen heavily used by tourists and locals daily. The road is also 'essentially pedestrianised' and provides access to Benmore Botanic Gardens and Pucks Glen, both key to local tourism. Construction works would damage the holiday let trade as many tourists specifically stay for Pucks Glen and the Botanic Gardens.
  - Pucks Glen is an area of outstanding natural beauty and it would be a travesty for the Proposed Development to directly affect and interfere with the trail, both visually and through disruption.
  - Negative impacts to surrounding views and property prices.
- **With regard to other routes:**
  - B3b and C2: closer to residential areas and roads so probably more visible
  - A3 (no explanation included).
  - Node adjacent to C1. All tourist traffic coming and going in to and out of Dunoon and area will see the new very tall pylons.

Q7. Are there any factors, or important points that you believe have not been considered and should be brought to our attention?

Most participants made a comment in response to this question, these included:

- Options to place the infrastructure underground.
- More details about intentions for Nodes required.
- Density of human settlement has been considered. Hopefully the effect on the landscape is also a major consideration.
- Can the towers not be coloured a dark grey to be disguised in surrounding trees.
- AB1 should not be progressed further.
- Oak trees, lichen, fungi and wildlife habitat on the Dun Daraich fort site should be considered independent of the site itself.
- Sensitive species within the River Echaig.
- Recreational trails between Craig Laith near Inverchapel and Pucks Glen.
- Properties at Dalinlongart and an extension of the node at Strath Eachaig, or an additional node at Dalinlongart to avoid impacting these.
- Will trees be cut down and if so, is flooding considered.
- Concerns about the scale of construction, noise, access on existing road and environmental impact. Would like more detailed information on the size of site works and how this will affect residents on a daily basis for the 3 years of construction phase.

APPENDIX B: MEETING MINUTES - LLTNP MEETING 4TH MARCH 2021

LT193 Dunoon 132kV OHL Rebuild – LL&TNP Consultation

Date of Meeting	Thursday 4th March 2021
Location	Teams
Time	10:00 – 12:00

Meeting Attendees		
Amy Unitt (AU)	Planning Officer	LL&TNP
Graeme Heenan (GH)	Ecologist	LL&TNP
Simon Franks (SF)	Trees and Woodlands Advisor	LL&TNP
Doug Harman (DH)	Landscape Architect (Consultant)	LL&TNP
John Bacon (JB)	Project Environmental Co-ordinator	WSP
Andy Follis (AF)	Project Landscape Lead	WSP
Dan Thomas (DT)	Consents and Environmental Manger	SSEN
Andres Piojo (AP)	OHL Engineer	SSEN
Ritchie Hart (RH)	Forestry Manager	SSEN
Jim Campbell (JC)	Civil engineer	SSEN
Apologies		
Graham Reid (GR)	Project Manager	SSEN
Roddy MacLean (RM)	Land Manager	Savills/ SSEN

Circulation		
Attendees, Apologies & File		

Minutes by
Dan Thomas (SSEN) with input from WSP. Draft agreed by email with Amy Unitt (LL&TNP).

Item No	Description	Action	Target Date
1.0	**SHE Moment**		
1.1	DT – COVID vaccination now being rolled out, including to my dentist. His partner had unfortunately contracted COVID and was reasonably ill with it (now recovering), however after first vaccine my Dentist hadn't been ill despite cohabiting with her (although had to isolate for 2 weeks.) Optimistic vaccines will be effective in controlling virus, but everyone should still be careful and continue to follow government guidelines.	Note	
2.0	**Project update**		
2.1	DT provided a summary of the project, highlighting the Marine Consent application for the reconductoring of Loch Long crossing and the Section 37 application to be prepared and submitted for the rebuild of the OHL. It was highlighted that Section 37 would seek to include deemed planning for terrestrial works associated with reconductoring of the Loch Long Crossing, e.g. for the formation of access tracks and machine positions/ EPZs from where the conductors would be pulled through the spans. The reconductoring of the marine crossing would be scoped out of the Section 37 application as it is covered by the Marine Scotland Consent which has not been classed as EIA development.	Note	

3.0	**Project need and consideration of alternatives**		
3.1	DT reiterated the requirement for the project highlighting that it is non load-based project driven by requirement to rebuild the existing asset which is at the end of operational life and unable to be reused/ refurbished due to design issues with existing line. Through studies on an earlier connection project for a windfarm which failed to get consent (and therefore the related connection project is no longer being pursued), it has been shown that the existing line could not be upgraded to address fault issues on the OHL. The existing line has a very high fault rate associated with it and is the least reliable line on SSEN Transmissions network, most recently faulting in January 2021. These problems are due to the tower design and clearance issues causing faults in high winds. Since the existing towers can't be modified, a rebuild is therefore required. To maintain 132kV supply to Dunoon during construction, the replacement line is required to be built offline on a new alignment. Where this is not possible due to constraints, or where safe clearance can't be maintained between the new build and the existing OHL, temporary OHL bypasses may be required to facilaite the construction phase.		
3.2	Addressing the query raised in LL&TNP Routeing consultation why alternative options (such as undergrounding) were not presented in detail in the project Consultation Document (October 2020), in summary this was beyond the scope of this consultation exercise, as in effect an OHL Rebuild was considered the most appropriate solution to replace the existing OHL which is at the end of its operational lifespan. DT outlined the consideration of alternative options to OHL rebuild, highlighting there was no Option Appraisal Report (OAR) undertaken (done pre Gate 0) as the SSEN Transmission had proposed the project as a OHL rebuild. However, DT highlighted that the viability of underground cable or subsea cable solution was considered by the SSEN project team early on in the project in a study commissioned to assess the engineering feasibility of these alternative options. Both land and subsea cabling were discounted at this stage due to the associated challenges and increased risks and costs associated with them compared to rebuilding the existing OHL.		
3.3	A buried cable (or subsea cable) solution would introduce significant operational risks as are much harder to repair in the event of a fault than an OHL and may compromise our requirement to maintain an electricity supply to Dunoon. It is likely that due to the topography and geology installation would prove exceptionally challenging, and potentially would make reinstatement to acceptable standard very difficult. Additionally, because of the arduous terrain, there is concern over the long-term stability of slopes in many areas where cables would require to be installed. To address the challenges associated with the cable route, it would likely have to take a very convoluted route which would increase the length and the associated costs, works footprint and direct impacts accompanying installation of a twin circuit 132kV buried cable. Ultimately the costs associated with development, operation and maintenance of the Transmission systems form part of the energy user's bill. The costs associated with cabling these circuits would be many multitudes of the cost of rebuilding the overhead line, and so an OHL Rebuild is considered more in line with SHE Transmission licence conditions (SHE Transmission branded SSEN Transmission). It was highlighted the funding available for VISTA projects to underground existing visually sensitive assets would not be available for this project.		
3.4	Subsea cabling was also considered to present significant engineering and consenting challenges, exasperated by the steepness of the required landfall at the Loch Long end, limited landfall options at Dunoon, and the sensitive and heavy use of Loch Long including military interests. Similar to the buried cable solution, the	Note	

	costs associated with subsea cabling would also be significantly greater than for OHL rebuild.		
3.5	LL&TNP (SF?) asked if other stakeholders had commented on the text provided for the alternatives. JB and DT stated that no explicit comments had been made by the statutory and non-statutory consultees however public comments included those on the choice of structure and overarching comments on alternatives.	Note	
4.0	**Review of Route selection**		
4.1	DT ran through comments received from LL&TNP on the route selection documentation:	Note	
4.2	BNG – LL&TNP (GH) raised a query on the inclusion of BNG in the Routing stage documentation. GH was unclear how the BNG information was incorporated into the selection of the Preferred Route. DT explained that BNG is a recent consideration along with the commitment to deliver no net BNG loss on SHE Transmission projects. At the point of undertaking the routeing assessment the SSEN Routeing Guidance did not include BNG within the appraisal process. The SSEN Transmission BNG optioneering toolkit has been developed to assist in informing the OHL routeing process and provides an additional criterion to be considered. It is highlighted that even if BNG had been allocated a RAG scored within the OHL routeing, the results would have been considered alongside all other the criteria in the routeing optioneering which is unweighted and multifactorial. The route with the least baseline biodiversity would not have necessarily been the preferred option due to the other considerations that need to be made. JB provided an example that LL&TNP were happy with Route Option AB1 being ruled out due potential impacts upon the Loch Eck SSSI. With the revised SSEN Transmission Routeing guidance now published, the project will be following this revised guidance during the next stage (Stage 3 – Alignment Optioneering), which includes BNG comparison of options.	Note	
4.3	Landscape – DT acknowledged the Route options within the LL&TNP should have been scored Red for Landscape designation criteria within the Routing stage documentation, in line with SSEN Routeing guidance, however this would not have changed the outcome as all options would in part need to pass through the National Park, (as does the existing line). It is noted both the existing and any replacement OHL will cross a number of areas of different landscape character types (LCTs) within the National Park with subtly different characteristics. AF highlighted that whilst the landscape is categorised into different LCTs within the LLTNP, these are all variations of a broader regional rugged hill and glen landscape character and there is no route through this area that would be a good 'landscape fit' for an OHL. AF explained that although potential the landscape and visual impact of the OHL rebuild are a key consideration in the development and appraisal, impacts will be taken into consideration with other environmental, technical and economic factors to select a proposed route/ alignment which is economically viable, technically feasible, minimises impacts on important resources or features of the environment and reduces disturbance to those living in it, working in it, visiting it or using it for recreational purposes. AF acknowledged that although the LL&TNP was considered as part of the appraisal, neither the LL&TNP Evaluation of the Special Qualities (SLQ) of Loch Lomond & The Trossachs National Park nor the SNH (now NatureScot) Report on the Special Landscape Qualities of the Loch Lomond and The Trossachs National Park were explicitly addressed in the appraisal of Route Options. The	Note	

	project team has undertaken further review of the SLQ of the LL&TNP and it is considered that they would not alter the conclusion on the Preferred Route documented in the Consultation Document. This will be included withtin the publication of the Report on Consultation. AF stated that at this route selection stage a full analysis of the comparative sensitivities of the landscape would not have helped reach a different conclusion and therefore considers the appraisal is fit for purpose.		
4.4	Forestry – DT expressed engagement with Scottish Forestry and FLS, highlighting potential to include native woodland replanting as compensatory planting assisting with BNG objective. DT state that Scottish Forestry has responded and highlighted recent extensive native woodland planting on Carrick Castle Estate. This planting was discussed. The extent and potential impacts of the planting illustrated in context with the existing OHL was highlighted where the project would seek to rebuild above the existing line in this section. SSEN were previously unaware of the planting in this area, but once reviewed it was confirmed would not impact conclusion of the Routing process as the woodland has not yet established, however it would require consideration for minimising impact and compensatory planting.	Note	
5.0	**Report on Consultation**		
5.1	DT stated that a report on consultation is due to be published which includes the consultation comments received and the project responses to these comments. It was wished to conclude the Stage 2 (Route Optioneering) element of the OHL Routeing process with LL&TNP and this meeting forms part of that process.	Note	
6.0	**Introduction of Alignment options**		
6.1	DT introduced the alignment options to LL&TNP from north to south. The iteration and rationalisation of the defined options was explained and it was highlighted where no alternative distinct alignment options had been identified. It was noted these alignment options are representative of an end alignment which would then have a limit of deviation to allow for micro siting which aim to reduce identified specific impacts or avoid identified constraints. Discussion was had on alignment options and led to wider discussion on elements for consideration as project progresses.	Note	
6.2	Craighoyle SSSI – LL&TNP (GH and SF) raised the topic of impacts on the SSSI. GH and SF noted that any impact on the SSSI should not be seen as 'black and white' as qualifying features of the SSSI includes lichens and not woodland.	Note	
6.3	Ancient Woodland – LL&TNP (GH and SF) raised a point around Ancient Woodland and it's classification as irreplaceable habitat in the BNG report. It was stated that a lot of the ancient woodland in the area is PAWS which will need to taken into consideration in any further ecology and BNG work. GH noted that the NWSS map alongside field data should be used to determine the ecological value of these habitats. JB stated that UKhab surveys are being undertaken to inform the BNG and alignment reporting, these will be considered alongside the NWSS mapping. BNG – DT expressed interest to engage with landscape scale, strategic non-native control, as part of BNG and will seek partnerships to do this. LL&TNP (GH and SF) confirmed	Note	

	this would make sense and identified riparian management of INNS, thought to be being coordinated by Argyll District Fishery Board. DT confirmed consultation with the Argyll District Fishery Board had been undertaken but understood the Eachaig Fishery Board (and Little Eachaig Fishery Board?) previously looked after and has potentially been disbanded.		
6.4	Forestry- Replanting of old OHL corridor with suitable species was highlighted as being an opportunity (if fits with forestry or Land Management Plans) and may enable softening of the hard forestry edges accordingly. RH confirmed commitment to replace no less woodland than that which requires removal by the project, and this would be done through voluntary agreements with landowners. LL&TNP (SF) highlighted that FLS were likely to have just completed finalising Land Management Plans in the Preferred Route. This corroborates what was discussed in previous FLS meeting. The need to control non-native species as part of the project was also discussed – problem species including Rhododendron ponticum and Western Hemlock tying into BNG opportunities.	Note	
6.5	LL&TNP (SF) referenced forestry and the planting density at Carrick Castle Estate is likely to be associated with golden eagle habitat. JB noted that WSP have already undertaken consultation with NatureScot and are aware of the golden eagle presence in the area. JB stated that environmental surveys completed at the time of the alignment appraisal, for example the breeding bird surveys will not be completed, are to be used to inform appraisal outcomes.	Note	
6.6	Access- Use of existing Forestry accesses where possible tying into the management plans – need to ensure forestry access suitable prior to use (issues identified on other projects). Jim highlighted access challenges and consideration of sections which may be suitable for helicopter build.	Note	
7.0	**Program update**		
7.1	DT provided an update on the current project programme. Alignment consultation currently anticipated May 2021, Scoping consultation currently anticipated July 2021. EIA + Section 37 in 2022.	Note	
8.0	**AOB**		
8.1	Ritchie Hart – stated that he would liaise with Simon on forestry issues in the future.	Note	

Date and Time of next meeting	TBC
Location	Teams

APPENDIX C: ROUTEING ENVIRONMENTAL APPRAISAL REVIEW TECHNICAL NOTE

Scottish & Southern Electricity Networks

Project: Dunoon to Loch Long 132kV OHL

Routeing Environmental Appraisal Review

Technical Note

March 2021

LT000193-WSP-ENV-RPT-003

QUALITY MANAGEMENT

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Remarks	V1			
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Scottish Hydro Electric Transmission plc
Inveralmond House
200 Dunkeld Road
Perth PH1 3AQ
Tel: +44 (0)1738 456 000
www.ssepd.co.uk

Scottish & Southern Electricity Networks

CONTENTS

1 Introduction

1.1.1 Scottish Hydro Electric Transmission Plc (SHE Transmission) propose to construct a replacement 132 kilovolt (kV) double circuit overhead line (OHL) between the existing Dunoon substation and Tower 15 to the west of Loch Long, a distance of approximately 16.4km (hereafter referred to as the 'Proposed Development').

1.1.2 An environmental routeing study was prepared by WSP on behalf of SHE Transmission and reported on the process of environmental appraisal carried out, considering the environmental constraints and opportunities of each selected route option to inform the selection of a Preferred Route for the replacement 132 kV double circuit OHL. The information from this environmental routeing study was then combined and summarised, alongside an engineering routeing study and an economic routeing study, into a Consultation Document[1] published in November 2020 which sought comments on the proposals, the approach to route selection, the analysis of route options and the identification of a Preferred Route.

1.1.3 A consultation process was undertaken for the project between November and December 2020 to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the Preferred Route.

1.1.4 In response to the consultation comments received as part of the routeing consultation process a review of the environmental appraisal of route options was undertaken.

2 Review of Route Option Environmental Appraisal

2.1 Introduction

2.1.1 The appraisal of route options has followed the process defined in the SHE Transmission's Routeing Guidance[2], including the topics considered within.

2.1.2 Each route option has been considered in terms of its potential interaction with the environmental characteristics, features and sensitivities of the study area (defined by a project Corridor). The route options have then been compared to determine which has the greatest and least capacity or potential to accommodate the Proposed Development.

2.1.3 In line with the Red-Amber-Green (RAG) assessment criteria defined within the SHE Transmission Guidance, a RAG rating has been applied to each topic area within each zone. This rating is based on a three-point scale as indicated in Plate 2.1 below.

Most Preferred ↓ Least Preferred	Low potential for the development to be constrained.
	Intermediate potential for the development to be constrained.
	High potential for the development to be constrained.

[1] SHE Transmission (October 2020). Dunoon to Loch Long 132 kV OHL Rebuild Consultation Document (70065799-LT193_CD)
[2] Scottish & Southern Electricity Networks, 2017. PR-NET-ENV-501: Procedures for Routeing Overhead Lines of 132 kV and above

Plate 2.1: RAG Rating for Comparative Appraisal

2.2 Environmental Appraisal Results presented in the Consultation Document

2.2.1 A summary of the environmental appraisal of route options is presented below in Table 2.1.

Table 2.1 Environmental Summary RAG Rating Table presented in the Consultation Document

Route	RAG Impact Rating – Environmental														
	Landscape and Visual			Natural Heritage					Cultural Heritage		People	Land Use			Planning
	Designations	Character	Visual	Designations	Protected Species	Habitats	Ornithology	Geology, Hydrology & Hydrogeology	Designations	Cultural Heritage Assets	Proximity to Dwellings	Agriculture	Forestry	Recreation	Policy and Proposals
AB1															
A2															
A3															
B2															
B3															
C1															
C2															

2.3 Comments from consultation on the Consultation Document

2.3.1 In response to consultation, feedback was received via completed feedback forms, voice queries, email, post or phone call and written responses from statutory and non-statutory consultees.

2.3.2 Table 2.2 details the respondents received from stakeholders in response to the Consultation Document.

Table 2.2: Statutory and Non-Statutory Consultee Respondents

Consultee		
Historic Environmental Scotland	British Horse Society	Nuclear Safety Directorate (HSE)
NatureScot	BT	Defence Infrastructure Organisation
Scottish Environment Protection Agency (SEPA)	Scottish Rights of Way and Access Society (ScotWays)	Loch Lomond and Trossachs National Park Authority
Scottish Forestry	John Muir Trust	Edinburgh Airport
Glasgow Airport	Mountaineering Scotland	Glasgow Prestwick Airport
Argyll and Bute Council	NATS Safeguarding	Highland and Islands Airports
Marine Scotland	Transport Scotland	

2.3.3 When providing comments and feedback on this Consultation Document, SHE Transmission asked consultees to consider the following questions:

- Have we explained the need for this Project adequately?
- Have we explained the approach taken to select the Preferred Route adequately?
- Are there any factors, or environmental features, that you consider may have been overlooked during the Preferred Route selection process?
- Do you feel, on balance, that the Preferred Route selected is the most appropriate for further consideration at the alignment selection stage?

2.3.4 Where consultees provided information on any factors, or environmental features, considered to have been overlooked this information has been reviewed and an update to the environmental route options appraisal RAG provided, where applicable.

2.4 Review of Environmental Appraisal Results in light of comments from consultation

2.4.1 Based on the comments and feedback on the Consultation Document responses highlighted the following factors, or environmental features, considered to have been overlooked during the Preferred Route selection process:

- Special Qualities of the Loch Lomond and Trossachs National Park (LLTNP);
- Carrick Estate forestry planting; and
- National Catalogue of Rights of Way.

2.4.2 Each of these factors, have been considered for the relevant topics in detail below.

SPECIAL QUALITIES OF THE LOCH LOMOND AND TROSSACHS NATIONAL PARK (LLTNP)

2.4.3 The presence and potential impact of the Proposed Development on the LLTNP was considered as part of the environmental appraisal of Route Options and the subsequent selection of the Preferred Route. However, it is acknowledged that neither the LLTNP *"Evaluation of the Special Qualities of Loch Lomond & The Trossachs National Park"*[3] nor the SNH (now NatureScot) *"Report on the Special Landscape Qualities of the Loch Lomond and The Trossachs National Park"*[4] were explicitly referenced or addressed in the documents.

2.4.4 Any route between the two connection points (tower 15 and Dunoon substation) will cross the LLTNP, and will cross a number of areas of different landscape character types (LCTs) with subtly different characteristics. Whilst the landscape within the LLTNP is categorised into different LCTs, these are all variations of a broader regional rugged hill and glen landscape character. It is considered unlikely that any route through this area of the LLTNP would be considered a good 'landscape fit' for an OHL. It should also be noted that the existing OHL already passes through this area of the LLTNP.

2.4.5 It is considered that at this Route Selection stage a full analysis of the comparative sensitivities of the landscape would not have resulted in a different conclusion. If there were no existing transmission infrastructure already in place, all the landscapes affected by the route options within the LLTNP would be highly sensitive to the introduction of an OHL although there are slight differences between how these would be affected. For example, the forested glen side above Loch Eck would, for the most part, be slightly less susceptible to the introduction of an OHL than the steep hills and ridges to the east (because an OHL would follow the grain of the landscape rather than crossing ridges and valleys). However, in appraising sensitivity this slightly lower susceptibility is balanced by the fact that Loch Eck is ascribed a particular value by the public and by the LLTNP Authority.

2.4.6 The choice between route options through the LLTNP is considered finely balanced. As stated in the Consultation Document *"no one route option, or combination of route options, stands out as considerably better able to accommodate an OHL alignment."*

2.4.7 In terms of the risk of potential significant adverse landscape effects, the key differentiating point between route options is the presence or absence of an existing OHL in or alongside the route. Route Option AB1 was therefore ruled out on landscape grounds in the conclusions to the landscape and visual section of the appraisal where it states that Route Option AB1 would have *"… the greatest risk of adverse effects on the landscape due to the introduction of an OHL into landscapes not currently affected by one …".*

2.4.8 In visual terms, the balance is more difficult. Route Option AB1 is anticipated to affect fewer visual receptor locations because it avoids the settled area at the mouth of Glen Finart although it could be argued that it would affect a larger number of individual visual receptors because of the numbers visiting the Benmore Botanic Gardens and travelling along Loch Eck or staying in Strath Eachaig. However, this difficult question of balancing residents against visitors becomes moot when Route Option AB1 is ruled out on landscape terms.

[3] https://www.lochlomond-trossachs.org/park-authority/publications/evaluation-special-qualities-loch-lomond-trossachs-national-park

[4] NatureScot (2010). Commissioned Report No. 376. The Special Landscape Qualities of the Loch Lomond and The Trossachs National Park. Available at: https://www.nature.scot/naturescot-commissioned-report-376-special-landscape-qualities-loch-lomond-and-trossachs-national

2.4.9 Based on the above, the judgement on a Preferred Route is then made between route options parallel to the existing OHL either to the west or to the east (Route Options A2 and B2, A3 and B3 (a or b)). It is recognised that there is another conflict between landscape and visual when considering Route Option B2 against either Route Option B3a or B3b: there is a higher risk of adverse landscape effects west of the existing OHL at Pucks Glen, but more receptors at risk of adverse visual effects to the east of the existing OHL where it crosses Strath Eachaig.

2.4.10 The conclusion, as stated in the Consultation Document, of the landscape and visual appraisal is therefore that *"on balance a route which utilises Route Options A2 and B2 would be preferred as they would not introduce an OHL into a currently unaffected area of landscape and they avoid the more densely settled areas east of the existing OHL. However, this is on the understanding that an alignment can be found that avoids an unacceptable effect on Puck's Glen".*

CARRICK ESTATE FORESTRY PLANTING

2.4.11 A low-density native woodland has been established as part of a wider woodland creation scheme within Carrick Estate, located west of the existing OHL in Zone A. This planting would be located within both Route Option AB1 and Route Option A2.

2.4.12 At the time of writing a UK habitat classification survey has been undertaken for the area where this low-density native woodland planting has been identified. It is currently classified as 'heath' with notes made on the presence of immature broadleaf and conifer planting as heath was considered the dominant habitat at the time of the survey. A photograph of this area from the UK habitat classification survey is shown in Plate 2.2.

Plate 2.2: UK Habitat Survey site photograph of Carrick Estate Forestry Planting (November 2020)

2.4.13 As the planting is yet to establish it is not considered to alter the conclusions of the Land Use – Forestry topic and the Natural Heritage – Habitats topic.

NATIONAL CATALOGUE OF RIGHTS OF WAY

2.4.14 Information provided on the National Catalogue of Rights of Way (CROW) within the Corridor. These include Recorded Rights of Way (SA/SA31/1 and SA/SA37/1), Scottish Hill Tracks (SA/HT95/3, SA/HT95/1 and SA/HT94/3) and Heritage Paths (SA/HP109/1 and SA/HP416/1). Of these identified rights of way SA/SA37/1, SA/HT94/3, SA/HP109/1 and SA/HP416/1 are located within the Preferred Route (Route Options A2, B2, C1).

2.4.15 All of these parks are identified as core paths by the LLTNP Authority and Argyll and Bute Council and therefore have been considered as part of the Land Use – Recreation topic and therefore the conclusions within the Consultation Document are considered to remain valid.

REVISED ENVIRONMENTAL RAG RATING

2.4.16 The information provided on the Carrick Estate forestry planting and information from the National Catalogue are not considered to alter the RAG rating of the environmental topics. The Special Landscape Qualities of the LLTNP are not considered to alter the conclusion on the Preferred Route. However, it is acknowledged that the construction of a replacement OHL within the LLTNP, even considering the removal of the existing OHL, should be considered as a RAG rating of Red. Therefore, Route Options AB1, A2, A3, B2, B3a and B3b have all been allocated a RAG rating of Red. In addition, as Route Option C1 and Route Option C2 would be partially located within the LLTNP these should be considered as a RAG rating of Amber.

2.4.17 As a result of the review of information provided through the routeing consultation process a revised environmental RAG rating table is shown in Table 2.3.

Table 2.3 Revised Environmental Summary RAG Rating Table

Route	RAG Impact Rating – Environmental														
	Landscape and Visual			Natural Heritage					Cultural Heritage		People	Land Use			Planning
	Designations	Character	Visual	Designations	Protected Species	Habitats	Ornithology	Geology, Hydrology & Hydrogeology	Designations	Cultural Heritage Assets	Proximity to Dwellings	Agriculture	Forestry	Recreation	Policy and Proposals
AB1															
A2															
A3															
B2															
B3															
C1															
C2															

3 Conclusions

3.1.1 An environmental routeing study was prepared by WSP on behalf of SHE Transmission for the 'Proposed Development'. The results of the environmental routeing study were combined with the economic and technical routeing studies to select a Preferred Route. The results were summarised into a Consultation Document published in November 2020.

3.1.2 A consultation process was undertaken for the project between November and December 2020 to invite feedback on the rationale for and approach to, the selection of the Preferred Route. The consultation process asked a series of questions which included if any 'factors, or environmental features have been overlooked during the Preferred Route selection process'. The consultation feedback was reviewed and where factors or environmental features which were identified as missed; these included the Special Qualities of the LLTNP and Carrick Estate forestry planting.

3.1.3 This information was reviewed alongside the environmental route options appraisal and the appraisal revised where required.

3.1.4 The information provided on the Carrick Estate forestry planting and information from the National Catalogue are not considered to alter the RAG rating of the environmental topics. The outcome of this review identified that the Special Qualities of the LLTNP were considered as part of the environmental appraisal but not referenced explicitly within the reporting. On review of this information it has been determined that although the inclusions of LLTNP Special Qualities would result in a change in the RAG rating of the Landscape and Visual 'Designations' criteria it is not considered to result in a change to the Preferred Route which was consulted on.

3.1.5 Overall, it is considered that the Preferred Route would still remain as a combination of the Route Options A2, B2 and C1.