

Dunoon to Loch Long 132 kV OHL Rebuild

Environmental Impact Assessment

Volume 4 | Technical Appendix

Appendix 4.1 – Report on Consultation - Alignment





Report on Consultation – Alignment
Dunoon to Loch Long 132 kV OHL Rebuild

November 2022

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Scottish & Southern
Electricity Networks

TRANSMISSION



CONTENTS

GLOSSARY	III
PREFACE	V
EXECUTIVE SUMMARY	VI
1. INTRODUCTION	1
1.1 Purpose of Document	1
1.2 Document Structure	1
2. PROJECT OVERVIEW	2
2.1 The Need for the Project	2
2.2 Alternative Options Considered	2
2.3 Preferred Technology Solution	3
2.4 Proposals Overview	3
3. ROUTE AND ALIGNMENT SELECTION PROCESS	6
3.1 Background	6
3.2 Route Identification and Selection	6
3.3 Alignment Identification and Selection	8
3.4 Alternative Route and Alignment	8
4. THE CONSULTATION PROCESS	9
4.1 Introduction	9
4.2 Methods of Consultation	9
5. STAKEHOLDER CONSULTATION RESPONSES	13
5.1 Feedback forms	13
5.2 Statutory and Non-Statutory Stakeholder Feedback	13
6. PROJECT RESPONSES TO CONSULTATIONS	15
6.1 Overview	15
6.2 Consultation Responses	15
7. ALIGNMENT CHANGES	26
7.1 Alignment Deviation	26
8. CONCLUSIONS AND NEXT STEPS	27
8.1 Summary	27
8.2 Next Steps	27
APPENDIX A: SUMMARY OF RESPONSES TO FREQUENTLY ASKED QUESTIONS	28
APPENDIX B: FIGURES	34

Figure 1.1: Location

Figure 3.1: Alignment Options and Preferred Alignment

Figure 7.1: Proposed Alignment

GLOSSARY

Term	Definition
Alignment	A centre line of an overhead line OHL, along with location of key angle structures.
Alignment (preferred)	A centre line of an overhead line (OHL), along with location of key angle structures taken forward to stakeholder consultation following a comparative appraisal of alignment options.
Alignment (proposed)	A centre line of an overhead line (OHL), along with location of key angle structures taken forward following stakeholder consultation to the EIA stage of the overhead line routeing process.
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 influencing decisions, policies or programmes of action.
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)	Environmental Impact Assessment. A formal process codified by EU directive 2011/92/EU, and subsequently amended by Directive 2014/52/EU. The national regulations are set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. The EIA process is set out in Regulation 4(1) of the regulations and includes the preparation of an EIA Report by the developer to systematically identify, predict, assess and report on the likely significant environmental impacts of a proposed project or development.
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.
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 alleviation of adverse impacts.
Overhead line (OHL)	An electric line installed above ground, usually supported by lattice steel towers or poles.
Route	A linear area of approximately 1 km 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.
Stakeholders	Organisations and individuals who can affect or are affected by SSEN 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.
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 SSEN Transmission

PREFACE

This Report on Consultation has been prepared by WSP UK Ltd. on behalf of Scottish and Southern Electricity Networks (SSEN Transmission), operating under licence held by Scottish Hydro Electric Transmission plc, to provide a summary of the comments received from stakeholders on the Preferred Alignment identified for the proposed Dunoon to Loch Long 132 kV Overhead Line Rebuild project. This Report on Consultation also provides a summary of how SSEN Transmission have responded to comments received by stakeholders on the Preferred Alignment and details the actions that will be taken as the project progresses.

A Consultation Document¹ was published in August 2021 which sought comments on the proposals, the approach to alignment selection, the analysis of alignment options and the identification of a Preferred Alignment.

This Report on Consultation describes how the feedback from consultation has informed the identification of the Proposed Alignment. Once confirmed, the Proposed Alignment 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 SSEN 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. Material was made available on the website for a period before and after this event to allow the public to review the material at a convenient time.

The virtual consultation events took place via the project website:

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

- Wednesday 25th August 2021 10am – 1pm
- Thursday 26th August 2021 5pm – 7pm
- Wednesday 8th September 2021 5pm – 7pm

¹ SSEN Transmission (August 2021). Dunoon to Loch Long 132 kV OHL Rebuild Alignment Consultation Document (LT000193-WSP-ENV-RPT-007)

EXECUTIVE SUMMARY

Dunoon is currently connected to the wider electricity grid network by a double circuit 132 kV 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 crosses Loch Long by a 1.4 km span, with four special structures, two either side, forming the crossing. As the existing OHL crosses Loch Long it passes between Transmission Network Operator areas. The transmission line to the west of the Loch Long crossing connecting to Dunoon Substation is within SSEN Transmission's licenced area, whilst the OHL on the east of the Loch Long crossing is maintained and operated by Scottish Power Energy Networks.

The existing OHL 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, SSEN Transmission, operating under licence held by Scottish Hydro Electric Transmission plc, 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.

SSEN Transmission is following a staged approach to routeing; Route Selection, Alignment Selection and Consenting Process. The Route selection stage was completed in April 2021, with a Proposed Route for the OHL selected, based on earlier studies and consultation. The preferred route identified generally west of and followed the existing OHL between Dunoon GSP and the Loch Long crossing.

Alignment options were identified within the preferred route which were then assessed against each other on environmental, engineering and cost considerations to identify a preferred alignment taken forward to consultation.

A Consultation Document was published in August 2021, describing the Alignment Selection process and selection of the Preferred Alignment for the replacement OHL. This Report on Consultation documents the consultation process which has been undertaken for the project between August and September 2021. 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 Alignment.

This report describes the key responses received and provides detail on the actions proposed in response to the issues raised. All comments received in response to the Consultation Document (August 2021) informed further consideration of the Preferred Alignment, and the selection of a Proposed Alignment.

The consultation process presented a Preferred Alignment consisting of Options 1, 2D, 3D, 4B, 5C and 6B (illustrated in **Figure 3.1**), however on the back of consultation with landowners, residents and community representatives around the Ballochyle area, the Preferred Alignment was revised. Discussion with local stakeholders highlighted significant concerns relating to potential impacts on private water supplies, visual impacts on residential receptors, forestry impacts and landscape impacts on the wider area. On the back of the feedback and further refinement the alignment was

undertaken in this section to address the concerns as far as possible, deriving the eventual Proposed Alignment which is more similar to an alignment following options 1, 2D, 3D, 4C, 5C and 6B. (Alignment option changed from 4B to 4C on the back of the consultation exercise).

It is recognised that the Preferred Alignment runs through a sensitive environment with challenging terrain. The revised alignment has been selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors, and after further refinement and design will become the Proposed Alignment to be taken forward to consent application.

1. INTRODUCTION

1.1 Purpose of Document

SSEN Transmission, operating under licence held by Scottish Hydro Electric Transmission plc, is proposing to construct a replacement double circuit 132 kilovolt (kV) 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 August and September 2021, during the Alignment Selection 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 Alignment².

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

1.2 Document Structure

The remaining section of this Report on Consultation is structured as follows:

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

Part 3: Route and Alignment Selection Process – sets out the route and alignment selection process and methodology that has been applied to date to derive a Preferred Alignment;

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: SSEN 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 (August, 2021), produced by SSEN Transmission plc

2. PROJECT OVERVIEW

2.1 The Need for the Project

Scottish and Southern Electricity Networks (SSEN Transmission), operating under licence held by Scottish Hydro Electric Transmission plc, owns, operates and develops the high voltage electricity transmission system in the north of Scotland and remote islands. SSEN Transmission's license under the Electricity Act 1989³ is 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 double circuit 132 kV 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 1.4 km span, with four special structures, two either side, forming the crossing. This crossing is to be reconducted, replacing the wires which carry the current and the associated fittings and fixtures, but reusing the four existing special structures which support the Loch Long crossing span. The refurbishment and reconducting of the crossing will be the subject of a separate study and therefore is not considered further in this report.

As the existing OHL crosses Loch Long it passes between Transmission Network Operator areas. The transmission line to the west of the Loch Long crossing connecting to Dunoon Substation is within SSEN Transmission's licenced area, whilst the OHL on the east of the Loch Long crossing is maintained and operated by Scottish Power Energy Networks.

Reconducting the existing Loch Long crossing and upgrading the special structures forming the crossing is part of the project's wider scope. However, as no rebuild of the OHL is required for these components they are not part of routeing process and were therefore not subject to the routeing consultation..

The existing OHL west of the Loch Long crossing is supported by an old design suite of metal lattice towers which are coming towards the end of their operational life. The OHL route passes some very steep and arduous terrain and has a very high fault rate associated it during high winds due to the design of tower used in the original build.

A capability study was undertaken in February 2019⁴ to see if the OHL was suitable for upgrading with larger conductors, associated with a Transmission connection request to Dunoon Grid Supply Point (substation), which has subsequently been withdrawn. The outcome of this study shows that almost half of the towers were in an unsatisfactory condition. Records for the existing OHL circuits show poor performance in terms of electrical faults that even refurbishing and reconducting the existing OHL would not resolve. Therefore, in order to ensure security of supply and meet current clearance standards, a new double circuit OHL is proposed to be constructed to replace the existing OHL.

SSEN 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, using different support structures (replacing the old design suite of metal lattice towers) to ensure security of supply.

2.2 Alternative Options Considered

Following the 2019 capability study, 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

³ UK Government (1989). The Electricity Act 1989

⁴ WSP, Scottish & Southern Electricity Networks (2019). Dunoon Reconducting, Stage 2 Line Modelling and Simplified Design Study, February 2019

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. The costs associated with these alternative solutions would be significantly greater than the costs associated with the rebuilding of the existing OHL. Taking this into account SSEN Transmission has determined that a new double circuit OHL is the preferred technological solution for this project⁵, replacing the existing double circuit OHL.

2.3 Preferred Technology Solution

SSEN Transmission has determined that a new double circuit 132 kV OHL supported on new support structures is the preferred solution following a review of environmental and technical considerations. Whilst not anticipated to be required or appropriate, this could potentially facilitate the use of alternative technology options for lengths of the Preferred Alignment, for example, cabling specific section(s) if required, i.e. following landscape and visual impact assessment. If a change in technology solution be proposed the routing of the connection should also be revisited as may have different impacts to be considered in balance, in line with SSEN Transmission's Routing Guidance⁶.

2.4 Proposals Overview

SSEN 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. Sections of the existing OHL will need to be removed during the construction programme in circumstances where the proposed OHL is being constructed on, or in close proximity to existing OHL alignment. Temporary diversions will be used to maintain supply during the off-line construction phase.

The new double circuit OHL will be supported on L7c metal lattice support structures. Other support types including L4(m) steel lattice towers and the new suite of transmission structure (NeSTS)⁷ steel monopole design were considered earlier in the routing process.

It is assumed that standard spans of approximately 300 m 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 220 m), meaning fewer support structures are likely to be required for the replacement OHL. The height of the replacement structures, including potential extensions, is between 23-44 m, compared to the height of the existing structures of approximately 22-35 m. 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 L7c steel lattice towers support six phase conductors (wires) on six cross-arms (three on each side for each circuit) and an earth wire at the top. Typical designs of support structures considered earlier in the routing process can be seen in **Plate 2.1**.

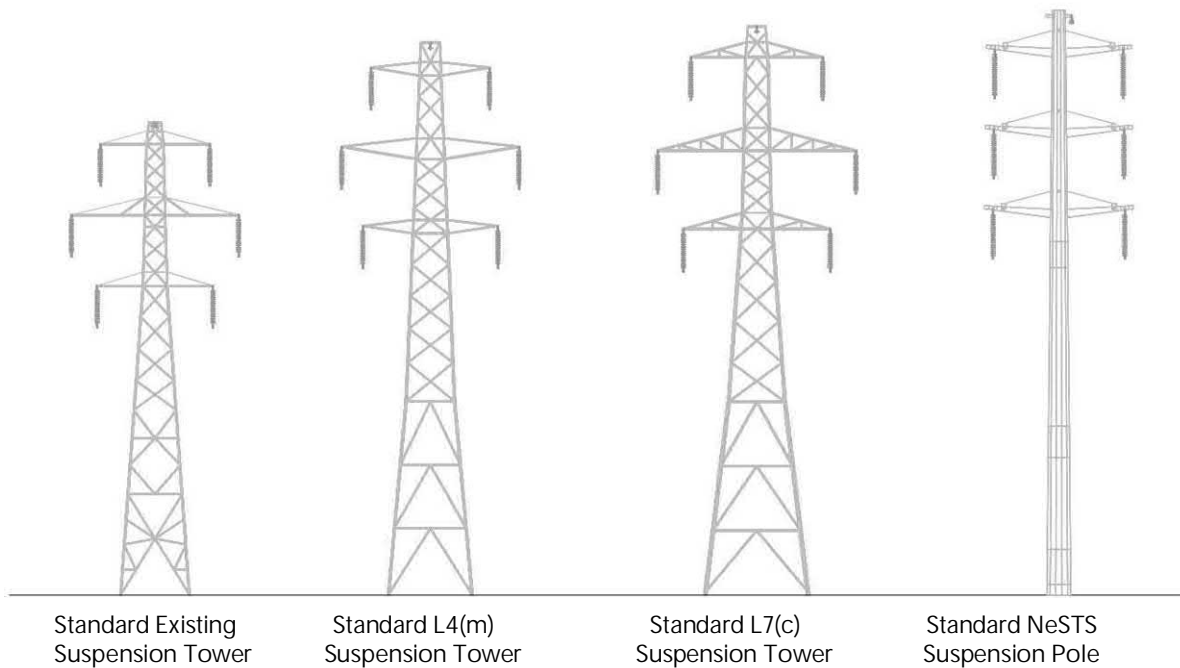
Following identification of the Preferred Alignment for the new OHL, a detailed topographical survey will be carried out. This is required to identify the proposed positions and heights of each individual tower. Site investigations to examine the ground makeup and geology will also be carried out at proposed tower positions where required. These will inform the support foundation designs.

⁵ The consideration of other technology options may be required in areas where particular physical or environmental constraints are identified.

⁶ Scottish & Southern Electricity Networks, 2017. PR-NET-ENV-501: Procedures for Routing Overhead Lines of 132 kV and above

⁷ <https://www.nestsproject.co.uk/>

Plate 2.1 – Typical OHL support structure design



2.4.1 Construction Activities

Construction activities are generally divided into the following phases, which include:

- alterations to the existing transmission and distribution network, including undergrounding of distribution lines under existing OHL or proposed alignment;
- enabling work (forestry clearance and establishment of accesses and construction compound(s));
- formation of foundations for new towers;
- erection of towers;
- conductor stringing (including construction of temporary scaffolding);
- inspections and OHL commissioning;
- removal of existing OHL; and
- removal and reinstatement of any temporary access tracks.

All construction activities will be undertaken in accordance with a Construction Environmental Management Plan (CEMP) which would define specific methods for environmental survey, monitoring and management throughout construction. A CEMP will be produced and agreed with statutory stakeholders prior to the commencement of construction.

2.4.2 Forestry Removal

Woodland removal will be required prior to the construction work and will be identified and assessed as part of the Environmental Impact Assessment (EIA) prior to submitting an application for consent under section 37 of the Electricity Act 1989, as amended.

The methods of woodland removal and management of timber would be described as part of the section 37 application. Agreement to provide compensatory planting in line with the control of woodland removal policy will be required.

2.4.3 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. Temporary access panel solutions may also be used to protect the ground; however, temporary stone tracks are likely to be necessary in most areas depending on existing access conditions, terrain and altitude. Helicopters may also be used to reduce access requirements.

Some construction accesses may be applied to be retained to provide safe operational access for inspection, maintenance and repair of the new OHL. This may include retention of the construction access tracks where their retention fits with other land management purposes, for example in areas of forestry. Or partially reinstating the access through reducing width, and/ or covering stone running surface to that suitable for ATV use. Other temporary tracks, where access is not required to be retained for operational purpose, would be removed upon completion of the Proposed Development with the ground reinstated to its former condition.

Access requirements for the Proposed Development will be dependent upon the construction methodology for the type and location of each OHL support structure. A more detailed plan for accesses will be prepared once a Proposed Alignment has been identified and the design progressed.

3. ROUTE AND ALIGNMENT SELECTION PROCESS

3.1 Background

The approach to alignment selection, in identifying and assessing alternative OHL routes, is informed by SSEN Transmission's Routeing Guidance, and is set out in detail in the Alignment Consultation Document⁸.

The guidance splits a project into the following stages:

- Pre-Routeing Activities: Selection of proposed connection option;
- Stage 1: Corridor Selection;
- Stage 2: Route Selection;
- Stage 3: Alignment Selection; and
- Stage 4: EIA and consenting.

Route Selection was completed in April 2021 and a Proposed Route was selected based on earlier studies and consultation⁹.

The Alignment Consultation Document describing the Alignment Selection process was published in August 2021, which identified a Preferred Alignment for the OHL. All comments received in response to the Consultation Document (August, 2021) informed further consideration of the Preferred Alignment, and the development of the Proposed Alignment.

On finalisation of the Alignment Selection process, the project will progress onto the EIA and consenting stage.

Each stage in the SSEN Transmission routeing process is iterative, bringing environmental, technical and economic considerations together in a way which seeks the best balance at each stage with the aim to an alignment with the optimum balance of technical, economic and environmental considerations.

3.2 Route Identification and Selection

A preliminary study area, hereafter known as the 'corridor', was identified within which the identification and assessment of route options could be completed. This corridor encompassed a range of feasible route options between the existing Dunoon Substation and Tower 15 (the crossing tower to the west of Loch Long).

Desk-based studies focussed within the corridor, although consideration was given to potential receptors outside of this area (e.g. environmental designations, visual receptors or cultural heritage sites). Route options (see **Plate 3.1**) were identified as part of the desk-based studies considering the most notable constraints. Considerations included a review of the steps outlined in the Holford Rules and SSEN Transmission's Routeing Guidance^{Error! Bookmark not defined.}.

It was recognised that finding an acceptable alignment across the settled valleys of Glen Finart and Strath Eachaig would be particularly challenging. In these areas 'nodes' were identified where further detailed study at Stage 3 (alignment selection) was deemed to be required to minimise potential environmental effects. For ease of assessment and interpretation, the corridor was divided into three 'Zones' (Zone A, B and C) for the definition of route options on the basis of these 'nodes' with the route options described within each zone.

A route options appraisal was undertaken in 2020. The appraisals were informed by desk studies and walkover surveys. Workshops integrating engineering, economic and environmental considerations were then held to select a Preferred Route as the starting point for developing an

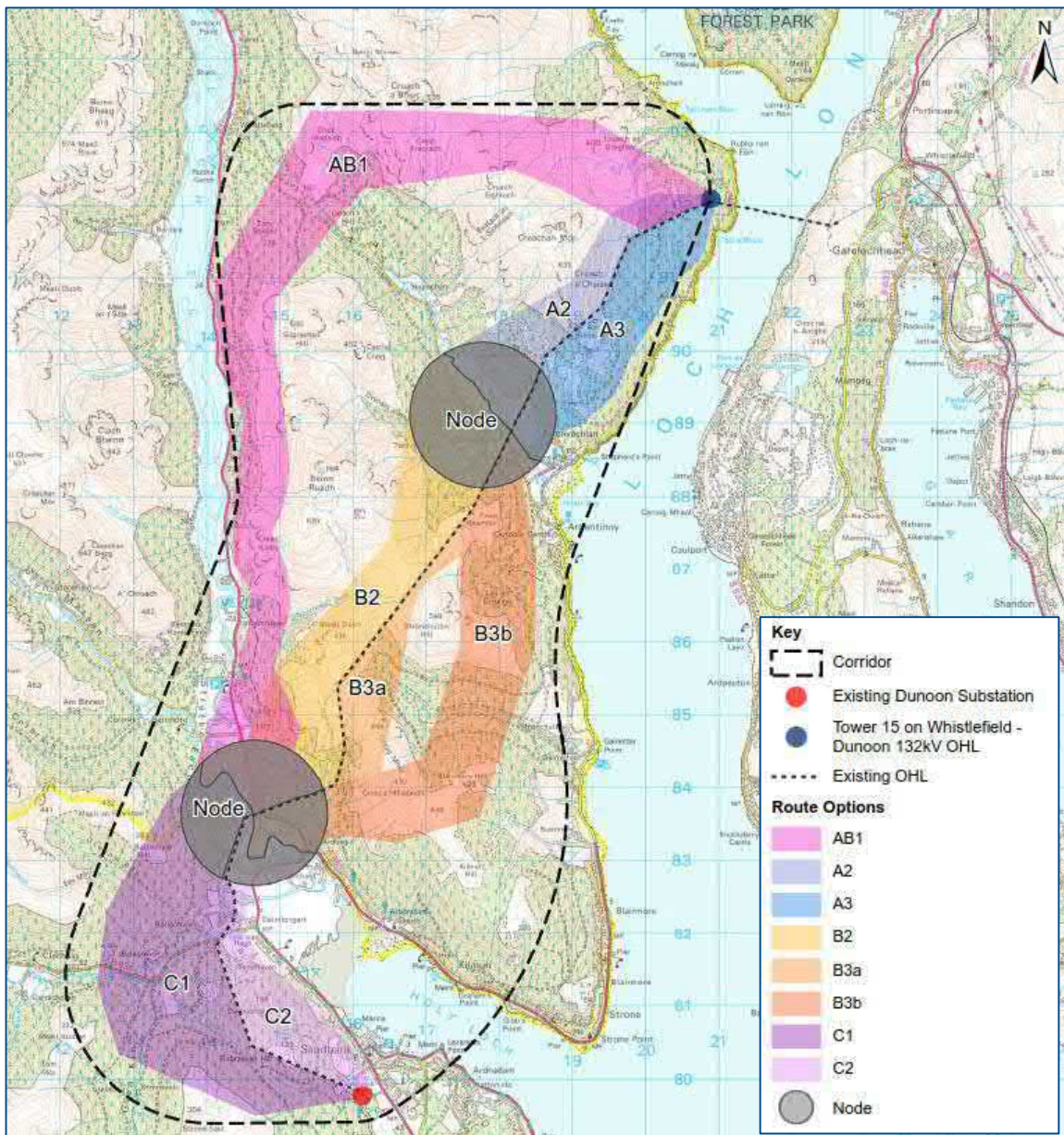
⁸ SSEN Transmission (August 2021). Dunoon to Loch Long 132 kV OHL Rebuild Alignment Consultation Document. August 2021. LT000193-WSP-ENV-RPT-007

⁹ SSEN Transmission (October 2020). Dunoon to Loch Long 132 kV OHL Rebuild Consultation Document. October 2020. 70065799-LT193_CD

OHL alignment. A combination of Route Options A2, B2 and C1 was selected as the Preferred Route due to the following reasons:

- Avoided the introduction on an OHL into landscapes not currently affected by one, the greater risk of visual effects crossing both Glen Finart and Strath Eachaig to the east of the existing OHL, the potential effects on Loch Eck SSSI.
- Provided greater opportunities for a reasonable landscape fit, greater accessibility for construction and maintenance and opportunities for minimising potential effects.
- Passed through a smaller section of Class 4.1 agricultural land.
- Was located at a greater distance from the Holy Loch LNR and LNCS.

Plate 3.1: Route Options



SSEN Transmission consulted on the Preferred Route in November 2020. Following consultation on the Preferred Route, a Proposed Route was confirmed as the basis for subsequent alignment selection. The comments received and the responses and actions proposed to be taken as the project progresses were documented in a Report on Consultation¹⁰.

¹⁰ SSEN Transmission (April, 2021). Dunoon to Loch Long 132 kV OHL Rebuild. Report on Consultation - Route Selection. LT000193-WSP-ENV-RPT-001

3.3 Alignment Identification and Selection

The approach undertaken to Alignment Selection is in line with the SSEN Transmission's Routing Guidance^{Error Bookmark not defined.} and consideration of the steps outlined in the Holford Rules.

Desk-based studies focussed within the Proposed Route, although consideration was given to potential receptors outside of this area, aided the identification and development of alignment options within the Proposed Route.

The Proposed Route was divided into 6 sections from north to south. Within each section alignment options were identified as illustrated in **Figure 3.1**.

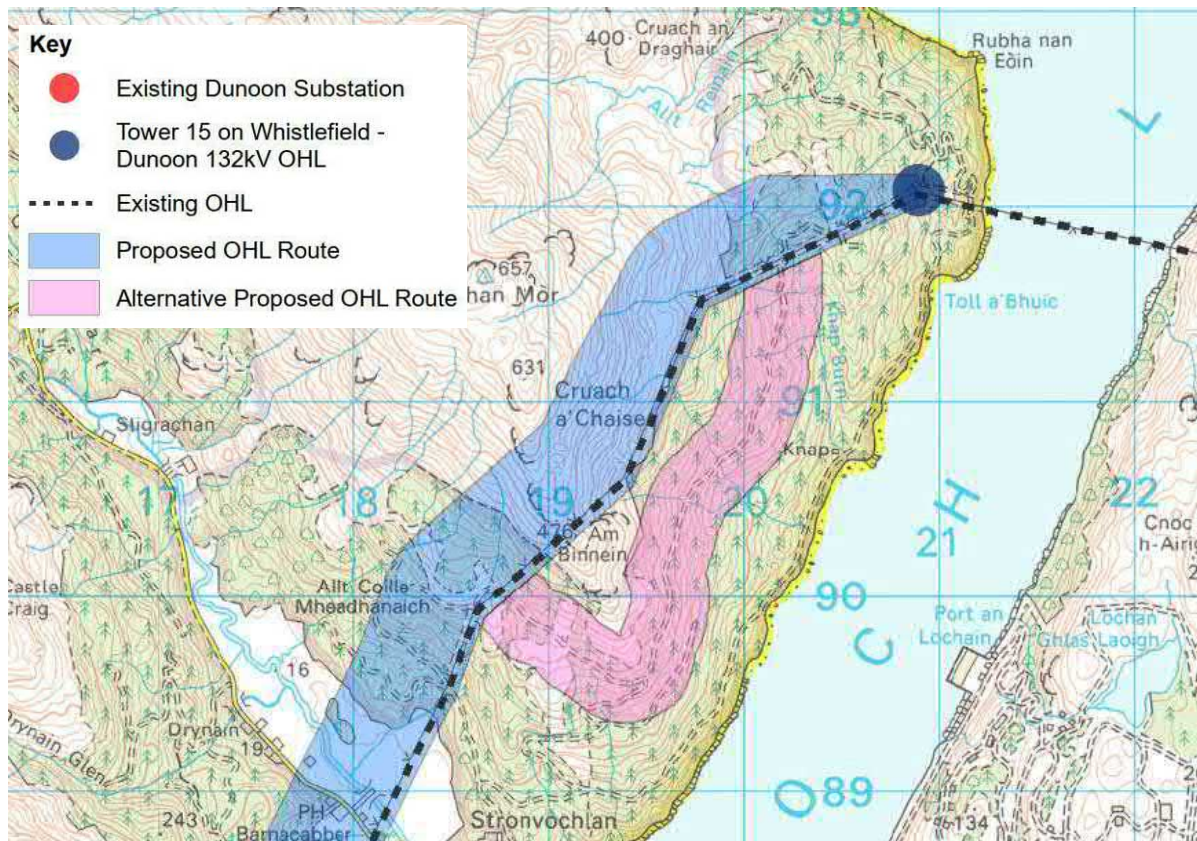
Following identification of the alignment options within the Proposed Route, a series of desk-based studies and surveys were undertaken to analyse and appraise the alignment options. Workshops integrating engineering, economic and environmental considerations were then held to select a Preferred Alignment. The alignment options and the Preferred Alignment are shown in **Figure 3.1** Preferred Alignment. The Preferred Alignment includes a combination of Alignment Options 1, 2D, 3D, 4B, 5C and 6B, was selected on the basis that it was considered to provide an optimum balance of environmental, technical and economic factors.

3.4 Alternative Route and Alignment

Following the selection of the Preferred Alignment, the Proposed Route was altered to accommodate an alternative route and alignment due to engineering and access safety concerns associated with the steep terrain of the northern section of the OHL. This approach avoided the requirement for significant civil engineering works to cut into the hill to form access tracks; which would likely be visually detrimental in this upland environment within the National Park.

Plate 3.2 illustrates the Alternative Proposed OHL Route within which the alternative alignment has been located. The location of the alternative alignment was informed through the consultation process which is discussed in the following section and illustrated in **Figure 7.1**.

Figure 2 – Alternative Proposed OHL Route



4. THE CONSULTATION PROCESS

4.1 Introduction

In accordance with the SSEN Transmission guidelines a process of consultation on the Preferred Alignment was undertaken. 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 Alignment, as set out below.

4.2.1 Consultation Document

The Dunoon to Loch Long 132 kV OHL Rebuild Consultation Document (August 2021) was produced detailing the selection process for the Preferred Alignment, taking account of environmental, economic and technical factors. The Consultation Document was made available for download in August 2021 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 Environment 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 24 September 2021.

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:
 - Has the requirement for the Dunoon 132kV Overhead Line Rebuild Project clearly explained?
 - In your opinion, has a clear overview of the required project elements been provided?
 - Do you agree with the preferred technology solution (L7c tower) that has been identified?
 - Have we explained the approach taken to select the Preferred Alignment adequately?
 - Do you agree with our Preferred Alignment for the following sections:
 - Section 1
 - Section 2
 - Section 3
 - Section 4
 - Section 5
 - Section 6
 - Are there any identified alignments you feel should NOT be progressed?
 - Are there any factors, environmental features or important points that you believe have not been considered and should be brought to our attention?
- A feedback form was also provided on the project webpage allowing users to submit comments.

4.2.2 *Public Consultations*

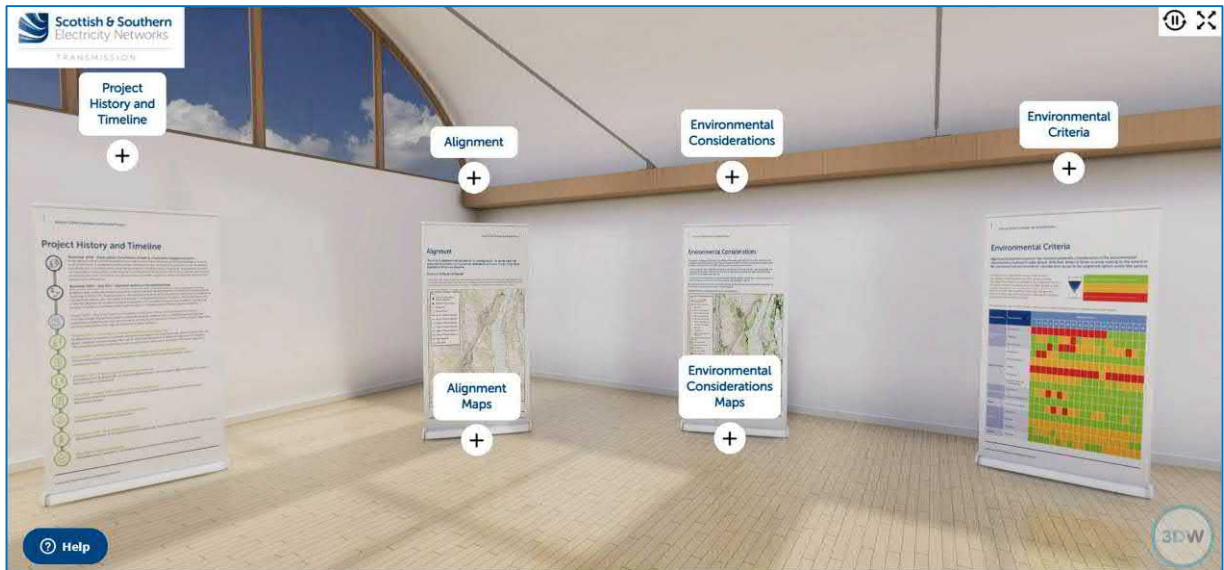
Consultation Event

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 on 25th and 26th August 2021 and 8th September 2021 and consultation also took place with landowners. SSEN 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. The consultation brochure and supporting material is available to view at this location:

<https://www.ssen-transmission.co.uk/projects/dunoon/>

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 – Consultation Booklet	6,193 properties and businesses
Email to Stakeholders to advise of consultation	MSP, MP, Councillors, Community Councils
Press Advert	Circulation 3,000
Social Media	Various social media streams

The virtual consultation was advertised using several methods(detailed above). SSEN Transmission contacted community stakeholders on the 13 August 2021 to advise them of the upcoming consultation on the Preferred Alignment. This communication went to the MSP and MP for the area, Councillors (Dunoon) and Community Councils (Kilmun, Ardentinny, Lochgoil, Sandbank and Dunoon). SSEN Transmission also contacted members of the public who had provided feedback during the previous round of consultation in 2020 and those who had signed up for project updates on the SSEN webpage (and had elected to be contacted). The email advised them of the dates of the upcoming consultation and the different ways they and the public could engage with the team regarding the plans. Consultation brochures were sent to houses and businesses in the area surrounding the project on Monday 16th August 2021. This contained information about the project and the Preferred Alignment, dates for the consultation and live chat events and how to join them, the feedback form and contact information for the Community Liaison Manager. An advert promoting the consultation was placed in the Dunoon Observer on Friday 20 August 2021. Social media was also used to raise awareness, a press release was issued, and details were posted on SSEN social media platforms.

Summary of the Virtual Engagement Event

The consultation period opened on 23 August 2021 and continued until 24 September 2021. All responses received during this time were considered by the project team and are included within this report. Feedback received outside of this time frame were considered however may not be included within this report. Stakeholders were able to view information about the project on the SSEN website and the virtual consultation room and complete the feedback form. Live chat sessions were held on Wednesday 25 August 2021 (10am-1pm), Thursday 26 August 2021 (5pm-7pm) and Wednesday 8 September 2021 (5pm-7pm).

A snapshot taken during 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 (Unique / Total)	64 / 83
Visitors to SSEN project website since the first broad advertising of consultation on 19 October (Unique / Total)	188 / 243
Number of visitors asking questions during the live chat events	6
Completed feedback forms	14

Where requested, hard copies of the consultation brochure and feedback form were sent out if stakeholders were unable to view the information online. Stakeholders who had questions or comments about the project were able to contact the Community Liaison Manager to request additional information about the project, these queries were responded to by the relevant members of the project team.

Additional Consultation: Northern Section Alignment

After changes were made to the northern section, changing the route from that previously presented (see Section 3.4 of this report), SSEN Transmission held virtual and face to face events with the public during August to October 2022 to provide an update on the Proposed Development in advance of application submission to demonstrate how feedback has been taken into account in the final design.

The virtual consultation and face to face events were advertised using various platforms, local newspaper Dunoon Observer and SSEN Transmission dedicated project webpage and an email was sent to all stakeholders that had signed up for updates. In addition, a postcard was delivered to 6,643 homes and businesses within the local advertising the dates, times, and locations of the face to face and virtual consultation events.

Councillors and Community Councillors were also e-mailed in advance along the route with a copy of the A4 poster and asked to share on any social media platforms and display it on local public notice boards.

Face to face events were held on Tuesday 30th and Wednesday 31st August 2022 at the Argyll Hotel in Dunoon in addition to one individual meeting with a community member; 63 people attended the event.

The on-line consultation took place on Thursday 1st September 2022 with two people attending. The project website had 263 views between August and October 2022. A Virtual Consultation Room was also produced which had 40 people access it.

Further engagement with Forestry Land Scotland was undertaken to refine the revised alignment within the northern section to minimise the impacts on their interests.

5. STAKEHOLDER CONSULTATION RESPONSES

In developing the Dunoon 132 kV 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. Two of the Community Councils actively engaged with the project during consultation on behalf of their communities. Responses have been made to questions raised and dialogue is ongoing.

Fourteen completed feedback forms were received and six written responses via email. 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 original Consultation Document.

Table 5.1: Statutory and Non-Statutory Consultee Respondents

Consultee	Date Response Received
Historic Environment Scotland	24/11/2021
NatureScot	24/11/2021
Scottish Environment Protection Agency (SEPA)	15/11/2021
Loch Lomond and Trossachs National Park Authority	08/10/2021
Argyll and Bute Council	01/11/2021
Defence Infrastructure Organisation	13/08/2021
Mountaineering Scotland	10/08/2021
NATS Safeguarding	13/08/2021
Marine Scotland	05/08/2021
Transport Scotland	20/11/2021

Additional responses were received directly from residents and landowners in response to both the original consultation and also subsequent consultations as a result of the change to the Proposed Route and alignment in the northern section (see **Figure 3.2**).

All consultation responses received during and after 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 Alignment option may necessitate specialist survey or would require careful design or mitigation to avoid sensitive features.

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

Table 6.1 (Section 6) provides a summary of statutory and non-statutory stakeholder feedback and SSEN Transmission's response.

6. PROJECT RESPONSES TO CONSULTATIONS

6.1 Overview

This section of the report provides the responses from SSEN 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 and other responses to consultation. These are presented along with a reply from SSEN 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 were raised which required 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 SSEN Transmission
<p>Historic Environmental Scotland</p>	<p>Historic Environment Scotland (HES) recommend that their Managing Change in the Historic Environment guidance note on setting should be used when considering setting impacts as the project progresses. Further good practice advice on the assessment of impacts on cultural heritage can also be found in Appendix 1 of the EIA Handbook¹¹.</p> <p>HES has previously provided comments on the preferred route and route options for this project (response dated 10 December 2020). During the previous consultation we raised concerns about the potential for significant impacts on the settings of a number of scheduled monuments in the vicinity of the overhead line (OHL), in particular Dun Daraich, fort, Glen Finart, Cowal (SM 9190). Our comments on the potential impacts on relevant scheduled monuments from the Preferred Alignment and alternative alignments are set out below.</p> <p>Sections 1, 3, 4, 5 and 6</p> <p>We are content that the Preferred Alignment in these sections of the OHL would not be likely to raise issues of national interest in relation to effects on the setting of scheduled monuments and other nationally important designated historic environment assets, such as the Benmore (Younger Botanic Garden) (GDL 00056) in the vicinity of the proposals.</p> <p>Section 2</p> <p>For section 2, where the route crosses Glen Finart in the vicinity of Dun Daraich, fort, Glen Finart, Cowal (SM 9190), four options are proposed. Options 2A and 2B would be routed to the west of the monument and are our preferred options as set out in our advice in December 2020, whereas options 2C and 2D would be routed to the east of the monument and are options that we highlighted would likely have a significant adverse impact on the setting of the monument such that we might object.</p> <p>Dun Daraich, fort, Glen Finart, Cowal (SM 9190)</p> <p>Potential impacts</p> <p>Options 2A and 2B would be routed to the west of the monument and would have an impact on outward views from the monument looking north west up the glen, as well as on views from further up the glen looking south east down it towards the monument. Alignment 2B is located closer to the monument than 2A. Both of these alignments would have an impact on the setting of the monument, but neither interrupt the relationship to the sea to the south east of the monument. As such, subject to careful positioning of towers, neither of these alignments is likely to raise setting effects of national interest for the monument.</p> <p>Option 2C would be routed to the immediate east of the monument approximately 50m from its eastern boundary. The towers on the new OHL are proposed to be between 26m and 44m in height, so whilst the electricity cable itself may</p>	<p>The HES guidance is noted, and HES will be included in consultation undertaken for the project as it progresses.</p> <p>The tower positioning within Glen Finart has sought to match that of the existing tower in the centre of the glen. The larger spans for the proposed OHL have enabled the towers either side to be located further outwith the glen, when compared to the existing tower positions.</p> <p>Effects on the historic environment will be considered through EIA process.</p>

¹¹ <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>actually be sufficiently high so as to be outwith sightlines from the monument south east down the valley, it is likely that the towers would dominate and be highly prominent in both outward views from the monument and in inward views towards it. This is likely to diminish and disrupt the understanding and appreciation of how the monument relates to the wider landscape, and as such a significant adverse effect on the setting of the monument is likely which would raise issues of national interest. We do not support this route alignment.</p> <p>Option 2D, the Preferred Alignment, would be routed to the east of the monument approximately 300m from its eastern boundary and would run parallel and as close as possible to the existing OHL. The proposed towers and electricity cable would be clearly visible in outward views from the monument looking south east down the valley towards the sea, and in reciprocal inward views from the sea heading up the valley, and as such they would have a significant adverse impact on the setting of the monument. Were it not for the existing OHL then it is likely that the diminishing of this key characteristic of the monument's setting (i.e. the key views of the valley floor, its relationship with the bay and sea, and the reciprocal inward views) would be of a severity that would impact on the integrity of the monument's setting such that we would object to the proposed development. The impact on the monument's setting has already occurred; the Preferred Alignment neither makes it significantly worse nor improves it. It is therefore unlikely that we would object to this Preferred Alignment.</p> <p>Mitigation</p> <p>If option 2D is progressed, then mitigation by design will be required in order to ensure that the impacts on the setting of the monument are no worse than the impacts resulting from the current OHL.</p> <p>Visualisations</p> <p>Any future EIA report should include visualisations looking south east down the glen from the monument if Preferred Alignment 2D is progressed, along with visualisations showing the reciprocal view. If the proposed OHL is located to the north west of the monument (i.e. route alignments 2A or 2B) then visualisations showing the outward view towards the OHL would be sufficient.</p> <p>Summary</p> <p>We recommend that further consultation is undertaken with us to discuss the potential effects of the proposals on Dun Daraich fort (SM 9190) and any potential mitigation for those impacts as the design of the project progresses.</p>	
NatureScot	<p>We would support your choice of preferred route for the alignment selection stage.</p> <p>A few additional points for your consideration:</p> <ul style="list-style-type: none"> The proposal is predominately within Loch Lomond and Trossachs National Park (LLTNP). In accordance with the agreement on roles in advisory casework between NatureScot and Scottish National Park Authorities, we offer comments only on the designated site and protected species aspects of this case. Advice concerning the potential 	Effects on landscape and ecology will be considered through EIA process.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>effects of the case on other important natural heritage interests, including landscape character, should be sought from relevant specialists within the National Park Authority.</p> <ul style="list-style-type: none"> • Scottish Planning Policy outlines the presumption in favour of protecting woodland and that removal should only be permitted where it would achieve significant and clearly defined additional public benefits. The criteria for determining the acceptability of woodland removal and further information on the implementation of the policy are explained in the Control of Woodland Removal Policy. Scottish Forestry can advise on all aspects of woodlands and forestry associated with developments and early consultation with them to clarify proposals and any particular restrictions or conditions on woodland removal that may apply to the area is recommended. • Please see our guidance on the use of helicopters and aircraft in relation to disturbance risks to Schedule 1 & 1A raptors and wider Schedule 1 species. • The study area is large and is therefore likely to support a number of protected species such as bats, otters and badgers. The greatest potential for this project to impact on such species is likely to arise from disturbance to their places of rest and/or shelter. However, this will be dependent on the micro-siting of the individual towers. It is therefore at this stage that potential impacts on protected species, and any requirement for licensing, should largely be addressed. • In addition to the Craighoyle Woodland SSSI, the study area also includes a number of non-designated semi-natural habitats such as ancient woodlands and peatlands. The preferred route option will pass through a number of these sites, however impacts will again depend greatly on the siting of individual towers. We therefore look forward further consultation in relation to this matter when the proposed locations of the individual structures is closer to being established. • We look forward to reviewing potential opportunities for positive effects on biodiversity from the development. Our current understanding of this in the emerging Fourth National Planning Framework regarding national, major and EIA development - planning applications will need to demonstrate enhancement in addition to mitigation. How applicants demonstrate enhancement will be left to the applicant and planning authority. We would encourage enhancement options to be sensible, ambitious in light of the current biodiversity crisis but deliverable, with long term objectives that aim for a balance of minimising onerous ongoing site management with achieving good result for native habitats. In this context developments should aim to deliver more than just mitigation of negative effects and explore whether delivery of positive effects might be achieved through mechanisms out with the planning system. As a large percentage of the study area is within the Scotland's Forest and Land this could provide ideal opportunity to work in partnership with Forest and Land Scotland in achieving greater positive effects on biodiversity. Examples may include but are not limited to; rhododendron clearance and monitoring management strategy in conjunction with the active creation of scrub woodland within/ adjacent to the operational corridor. You may find some ideas on our biodiversity webpage. 	

Stakeholder	Summary of Feedback	Response by SSEN Transmission
<p>Scottish Environment Protection Agency (SEPA)</p>	<p>Considered the report and acknowledged that the report clearly describes the need for the project, likely components of the works and appraisal undertaken to select the preferred route of the OHL.</p> <p>Identified that SEPA provided a detailed response during the Route Selection Stage (as documented in the Report on Consultation – Route Selection, dated April 2021). Asked that the previously detailed report continue to inform site layout.</p> <p>Limited comments to offer on the Preferred Alignment. Noted that Preferred Alignment is likely to maximise the opportunities to utilise existing infrastructure to enable the works and also limit the amount of felling required due to large areas adjacent to the existing OHL.</p> <p>Note that Sections 5 and 6 join in close proximity to the Allt na Criche and therefore recommend consideration is given to implementing an appropriate buffer from the watercourse in this location.</p> <p>State that SEPA assume further environmental and technical surveys will include surveys for peat, GWDTE and private water supplies.</p> <p>Recommend that SEPA guidance to management of forest waste are reviewed regarding forest removal.</p>	<p>SEPA guidance is noted, and SEPA will be included in consultation undertaken for the project as it progresses.</p>
<p>Loch Lomond and the Trossachs National Park (LLTNP)</p>	<p>Development Plan Policies</p> <ul style="list-style-type: none"> • It is not clear which specific policies of the National Park Local Development Plan will apply to the final proposal. However, I would draw your attention to our Overarching Policies, Natural Environment Policies 1-16, Historic Environment Policies 1-8 and Transport Policy 3. Please note that other policies and guidance may be relevant. You can find details of the policies and guidance on our website. <p>Has the requirement for the Dunoon 132kV Overhead Line Rebuild Project clearly explained?</p> <ul style="list-style-type: none"> • Yes. The National Park accepts that the existing overhead line is of an age that would require upgrading and accepts the reasoning for the replacement of the line. • Whilst the Alignment Consultation Document provides some additional information on the alternative options that were considered prior to the decision to proceed with a rebuild the existing overhead line, this falls short of the options appraisal that we previously requested. Providing transparency on the reasons for proceeding with the overhead line rebuild is important given the current significant investment in mitigating the impacts of existing electricity infrastructure elsewhere in the National Park (e.g. the undergrounding sections of overhead lines at Killin and Glen Falloch). • An indication of the difference in costs associated with the selected option versus a subsea or underground cable would help to improve clarity along with a summary of the environmental costs/benefits of the different approaches. <p>In your opinion, has a clear overview of the required project elements been provided?</p>	<p>Consideration will be given to these issues through the EIA process.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<ul style="list-style-type: none"> The consultation documents sets out a number of key elements which will affect the project. The National Park welcomes consideration of construction access at this early stage. More information could be provided on the likely widths of wayleaves through woodland/forestry and likely construction corridors. <p>Do you agree with the preferred technology solution (L7c tower) that has been identified?</p> <ul style="list-style-type: none"> As it is proposed to replace existing lattice towers for a lattice tower, the National Park does not have significant concerns about the preferred technology. The potential for less lattice towers with wider spans between them is welcomed, however, the preferred technology solution has the potential to be twice as tall as existing towers. The National Park requests that, where possible, towers are kept to the minimum height, to reduce impacts on the landscape. <p>Have we explained the approach taken to select the Preferred Alignment adequately?</p> <ul style="list-style-type: none"> The approach has been explained, however, the background survey work and assessment which inform the selection have not been provided. In addition, there is no detail on the evaluation of each criteria. It is therefore difficult to fully understand and assess the reasoning for the Preferred Alignment. <p>Do you agree with our Preferred Alignment for the following sections:</p> <p>For the reasons highlighted above it is not possible to provide a definitive view on the Preferred Alignment. The National Park broadly agrees with the principle of closely following the existing route from a landscape perspective. Please see the enclosed advice from our Ecologist for specific comments on each route.</p> <p>Section 1</p> <p>Only 1 option has been presented and it is accepted that there are limited options in this section. The avoidance of native woodland and closely following the existing wayleave is welcomed. Further detail on how the hillside will be accessed for construction, the restoration of the redundant wayleave and how the new wayleave fits into future forestry planting schemes will be required.</p> <p>Section 2</p> <p>Option 2D appears to be the most acceptable in terms of avoiding the SSSI and impacts on the scheduled monument. Construction corridors through woodland and peatland, including access, should be kept to a minimum. Sensitive construction techniques would be welcomed to avoid long term impacts and the line should be micrositied to avoid better quality habitat. There are significant concerns about construction access on the open hillside and less impactful measures (helicopter, trackway panels) would be welcomed.</p> <p>Section 3</p> <p>From a landscape and historic environment perspective the Preferred Alignment is agreed with. However, in ecology terms, the Preferred Alignment will have the greatest impact on native woodland. The use of the existing line for part of</p>	

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>the alignment is welcomed as this will utilise an existing wayleave. Consideration should be given to using existing planned felling of infected larch trees to minimise impacts.</p> <p>Section 4</p> <p>The options for this line are limited by the options for section 3. All options have impacts on woodland and the final route should be microsited to avoid better habitat.</p> <p>Section 5 and 6</p> <p>These sections are outwith the National Park and are only considered from a visual perspective for views from within the National Park. Although the line in this area is not as closely aligned to the existing line it is considered that the landscape context for the existing and proposed is broadly the same and once completed are unlikely to significantly change views from within the National Park. Consideration should be given to long term restoration of the redundant wayleave and minimising impacts from construction access.</p> <p>Are there any identified alignments you feel should NOT be progressed?</p> <ul style="list-style-type: none"> • Option 3C, which spans Puck's Glen, an important recreational path, is unlikely to be supported. <p>Are there any factors, environmental features or important points that you believe have not been considered and should be brought to our attention?</p> <ul style="list-style-type: none"> • Construction access • Replacement Planting • Ecology (Biodiversity Net Gain, Phytophthora ramorum felling) • Use of helicopters • Access • Scottish Planning Policy • Local Communities • Phasing <p>Conclusion</p> <p>The National Park understands the reasoning for the proposed upgrade of the existing line. Crossover with the RIIO-T2 VISTA project would be welcomed. The Preferred Alignment is broadly agreed with as it closely follows the existing line and would therefore have the least landscape and visual impact. Concerns are raised about the height of the proposed infrastructure, although the wider spans are welcomed. Further detail is required on expected construction corridors, wayleave widths, the restoration of the redundant wayleave and expected felling. The consideration of construction</p>	

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>methods at this stage is welcomed and the National Park strongly recommends that temporary stone access tracks during construction are kept to a minimum.</p>	
Argyll and Bute Council	<p>No immediate concerns on the consulted alignment.</p>	<p>None required</p>
Defence Infrastructure Organisation	<p>No concerns relating to the project.</p>	<p>None required</p>
Mountaineering Scotland	<p>No comment to make on the alignment and context included in the consultation.</p>	<p>None required</p>
NATS Safeguarding	<p>Consider that there the proposed development does not conflict with the safeguarding criteria and therefore have has no safeguarding objection.</p> <p>Noted that should there be any changes are proposed development then further consultation will be required prior to any planning permission or any consent being granted.</p>	<p>Comments regarding further consultation are noted. NATS Safeguarding will be included in consultation undertaken for the project as it progresses.</p>
Marine Scotland	<p>Provided a link to Marine Scotland scoping guidelines for freshwater and diadromous fish and fisheries associated with onshore wind farms and transmission lines which outlines what developers should consider.</p>	<p>The Marine Scotland scoping guidelines are noted, and Marine Scotland will be included in consultation undertaken for the project as it progresses.</p>
Transport Scotland	<p>Information passed to SYSTRA Limited (as Term Consultants to Transport Scotland – Roads Directorate) for review.</p> <p>Noted that Transport Scotland was previously consulted on a Route Option Consultation Document and provided comments in a letter dated 30 November 2020. In response Transport Scotland commented that while none of the possible routes will have a direct impact on the trunk road network in terms of crossing points, Transport Scotland would require an assessment of the potential environmental impacts associated with increased traffic levels on the trunk road network be carried out.</p> <p>Noted that Transport Scotland has no comment to make on the Preferred Alignment, however comments, provided at the Route Selection Stage, regarding the assessment of increased traffic levels remain valid.</p> <p>Await consultation on the forthcoming Environmental Impact Assessment Scoping document and will be happy to provide comment at that stage.</p>	<p>Transport Scotland will be included in consultation undertaken for the project as it progresses.</p>

Table 6.2: Feedback Form Responses

Summary of Feedback	Response by SSEN Transmission
<p>Overall, 86% of the respondents agreed that the requirement for the project was clearly explained and that a clear overview of required project elements was provided.</p>	<p>Comments are acknowledged. Further public exhibitions and consultations will be undertaken during the EIA stage and feedback from stakeholders will inform the work undertaken.</p>
<p>Concerns were raised about the clarity of information available during the consultation process related to:</p> <ul style="list-style-type: none"> • Clarity of the consultation material; and • Virtual engagement excluded lots of the community from having their say and giving them awareness of what is going on. 	<p>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.</p>
<p>Overall, 64% of the respondents agreed with the preferred technology solution (L7c tower) that has been identified and 22% disagreed.</p> <p>Reasons for agreeing included:</p> <ul style="list-style-type: none"> • We need to keep our electricity line up to date and in good condition in line with the rest of Scotland; and • Future proofing is an important positive. <p>Reasons for disagreeing included:</p> <ul style="list-style-type: none"> • L7C towers are unsightly and old fashioned in decision, preference is given to the NeST option which is minimalist and modern look and fits in better with the environment; and • A slight on the environment. 	<p>The range of responses regarding the merits of the preferred technology solution are noted. 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.</p>
<p>79% of respondents stated their preference for the Preferred Alignment. Reasons listed included that it is close to the existing OHL and agreement was on the basis that wildlife are not directly affected.</p> <p>79% of respondents also agreed that the approach taken to select the Preferred Alignment was adequate and 14% of respondents disagreed with the approach.</p> <p>Reasons for agreeing:</p> <ul style="list-style-type: none"> • The maps provided were easy to read to locals; • The situation has been explained; and • Process demonstrates no route is acceptable for OHL. Especially conclusion that line should stay the same at Pucks Glen. <p>Reasons for disagreeing:</p> <ul style="list-style-type: none"> • Many options were demonstrated but no confirmed route explained; • The writing under the structure is difficult to decipher; • Maps are useful but a stronger colour variance would be more helpful; and • The maps are too small to read. 	<p>Comments are acknowledged. It is acknowledged that local involvement 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.</p>

Summary of Feedback	Response by SSEN Transmission
<p>Comments raised on the identified alignments which shouldn't be progressed. Comments on this topic included:</p> <ul style="list-style-type: none"> • Do not proceed with the NeST option, keep the height of the structure as low as possible. • No, as long as local wildlife and beauty stop are not affected, it can only be positive for the future. • Further options needed as 3D retains current visual impact at Pucks Glen, 3C would make it worse? Further options needed. • Other alignments are higher and more prominent in landscape. • 2A and 2B – existing is a straight why is there a detour. • 5C is too close to Sandhaven homes. 	<p>Comments are acknowledged. TBC Further public exhibitions and consultations will be undertaken during the EIA stage and feedback from stakeholders will inform the work undertaken.</p>
<p>Concerns raised about the scale of construction, comments included:</p> <ul style="list-style-type: none"> • Construction noise; • New or existing roads that will be used for access; and • The need for resurfacing roads. 	<p>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.</p>
<p>Queries about the merits of subsea cabling and undergrounding were also raised by residents.</p>	<p>As stated in Section 2.2 and 2.3 of this report, undergrounding the entire circuit was discounted on basis of cost, technical challenges along the route and 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 specific sections, in the event of an unmitigable significant landscape effect being identified during EIA.</p>
<p>Concerns about the visual impact of the Proposed Development, comments included:</p> <ul style="list-style-type: none"> • Visual impact effect for a large proportion of the community; and • Size of the towers unclear so difficult to get a clear visual understanding at this stage. 	<p>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.</p>
<p>Environmental concerns were raised in relation to:</p> <ul style="list-style-type: none"> • Effects on wildlife; • Large population of protected species in the area will be directly affected; and • Wildlife is the most important followed by local beauty spots and tourist attractions. 	<p>These comments and environmental sensitivities are noted. The appraisal of alignment options has taken into consideration environmental consideration including ecology. Further assessment and surveys will be undertaken at the EIA stage, as required, to seek an acceptable alignment that minimises potential environmental effects.</p>
<p>Concerns regarding the temporary bypasses to be considered in order to help the visual impact on the landscape.</p>	<p>Comments are acknowledged. Temporary bypasses will be limited to the construction phase. These will need to be built to be safe and reliable to provide continuous supply during construction.</p>

Summary of Feedback	Response by SSEN Transmission
<p>Concerns were raised regarding Sections 4 and 5 relating landscape and visual impacts, forestry management and private water supplies at Ballochyle.</p>	<p>Comments are acknowledged. The alignment has been significantly altered as a result of concerns raised during consultation, as discussed in Section 7.1 below.</p>
<p>Concerns were regarding the revised alignment in the northern section and impact on forestry operations.</p>	<p>Through discussion with Forestry Land Scotland there was a preference to keep the alignment to the west (topside) of the existing access track to minimise impacts on the forestry, ideally with a 50 m stand off from the access track to allow for safe operations beneath. This has been accommodated in the Proposed Alignment.</p>

7. ALIGNMENT CHANGES

Throughout the consultation period SSEN Transmission engaged with the community through meetings on site and virtually. Listening to the local communities' concerns about the project and getting an insight into the local area from their perspective enabled SSEN Transmission to understand the effects that the consulted alignment would have on certain areas. These discussions were both paramount and invaluable to the decision-making process.

Following this engagement, SSEN Transmission have amended the Preferred Alignment presented during the consultation to reflect the issues and concerns raised during the consultation and subsequent design progression to result in the Proposed Alignment. **Figure 7.1** presents both the Preferred and Proposed Alignments to illustrate where changes have occurred.

Below is a summary of alignment changes made in response to consultation comments.

7.1 Alignment Deviation

In response to public consultation feedback regarding visual effects within Section 5, during refinement the alignment was moved further away from residences and further up the hill to increase distance from residential receptors.

During a subsequent discussion and meeting with local residents, landowners and community representatives, concerns relating to the alignment were highlighted and discussed.

Concerns included:

- impacts on Private Water Supplies;
- visual impacts on residential receptors;
- landscape impacts on wider receptors; and
- forestry impacts.

During further assessment considering the identified concerns, a new alignment was derived which was lower on the hill, came off the hill sooner, and tied into Alignment Option 5C rather than 5B (as was identified as the preferred alignment during the consultation).

This revised alignment keeps the OHL down-slope of the PWS sources, thus significantly reducing the risk to these during construction. The revised alignment also significantly reduces the height of the replacement OHL on the landscape, reducing potential landscape and visual impacts to receptors looking across to the hill. By limiting the height of the alignment on the Ballochyle hill, the visual impact on receptors leaving Sandbank/ Dunoon on the main road (A815) will be reduced. During consultation with the Ballochyle community this landscape impact was highlighted as being increased due to the necessary tree felling required to form a cleared corridor associated with the replacement OHL. It is noted that bringing the alignment off the hill sooner, tying into an alignment along 5C would reduce this effect, as well as reducing the length of the replacement line transecting forestry areas, subsequently reducing associated forestry impacts.

The revised alignment also removes partially skylined towers being visible from residential dwellings and moves the alignment of the replacement OHL closer to the existing OHL alignment which was an approach generally supported throughout consultation exercises.

The Alternative Proposed OHL Route in Section 1 has undergone consultation with stakeholders as part of the EIA Scoping process. The subsequent proposed OHL alignment went through a number of iterations and further consultation with Forestry and Land Scotland (the landowners) to identify an alignment which minimises impacts on forestry operations in this area as far as it practicable.

8. CONCLUSIONS AND NEXT STEPS

8.1 Summary

This Report on Consultation documents the consultation process which has been undertaken for the project between August 2021 and November 2022. 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 Alignment.

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

In response to public consultation feedback regarding visual effects, potential effects on private water supplies and forestry management a deviation to the consulted alignment was proposed within Sections 1, 4 and 5 of the Proposed OHL Route to reduce potential effects.

8.2 Next Steps

The project will now be taken into Stage 4: EIA and Consenting. During this stage the Proposed Alignment and associated infrastructure will be assessed from an environmental perspective, environmental impacts identified, and mitigation measures adopted to minimise environmental effects as far as is practicable.

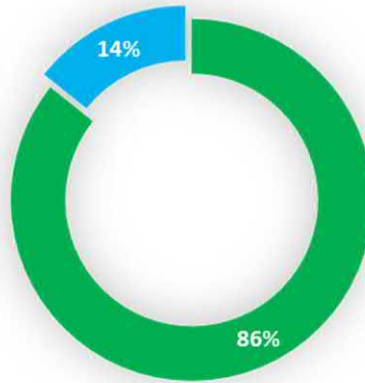
Members of the public and other interested stakeholders will be invited to attend an information event at the EIA stage which will present the proposals for which necessary consents and permissions under the Electricity Act 1989 will be sought. The anticipated programme is as follows:

Spring 2022	Request for EIA scoping opinion.
Summer/Autumn 2022	Finalise design to make applications for necessary consents and permissions.
Winter 2022/2023	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 as the project progresses.

APPENDIX A: SUMMARY OF RESPONSES TO FREQUENTLY ASKED QUESTIONS

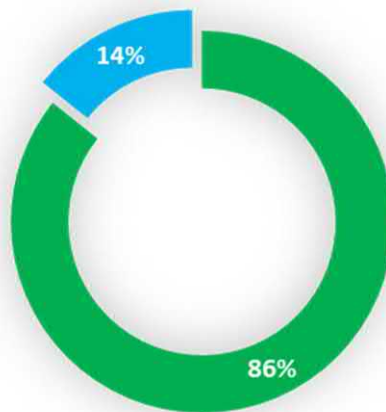
Q1. Was the requirement for the Dunoon 132kV Overhead Line Rebuild Project clearly explained?



■ Yes ■ Unsure

Out of the 14 responses, 86% (12) chose yes and 14% (2) were unsure.

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



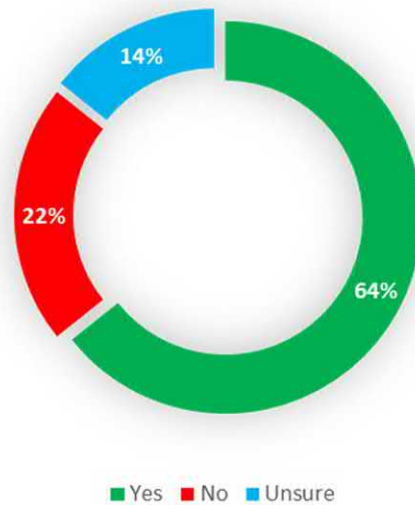
■ yes ■ Unsure

Out of the 14 responses, 86% (12) selected yes and 14% (2) were unsure.

Q3. If no or unsure, are there any element(s) of the project that require further clarification?

One person commented on this section with 13 people choosing to leave this section blank. The comment stated that a simplified version would be more helpful as the booklet was too technical to understand.

Q4. Do you agree with the preferred technology solution (L7c tower) that has been identified?



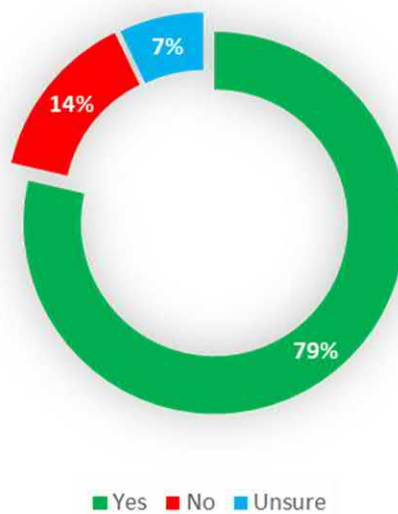
Out of the 14 responses 64% (9) selected yes, 22% (3) choosing no and 14% (2) were unsure.

Please provide a sentence to explain your answer.

Out of 14 people, 7 opted to leave this section blank. Comments included;

- We need to keep our electricity line up to date and in good condition in line with the rest of Scotland.
- Future proofing is an important positive.
- H7C towers are unsightly and old fashioned in decision, preference is given to the NeST option which is minimalist and modern look and fits in better with the environment.
- A slight on the environment.

Q5. Have we explained the approach taken to select the Preferred Alignment adequately?
Please provide a sentence to explain your answer



79% (11) chose yes, 14% (2) selected no and 7% (1) chose unsure

Out of 14 responses, 8 opted to comment to explain their answer, comments for this section included:

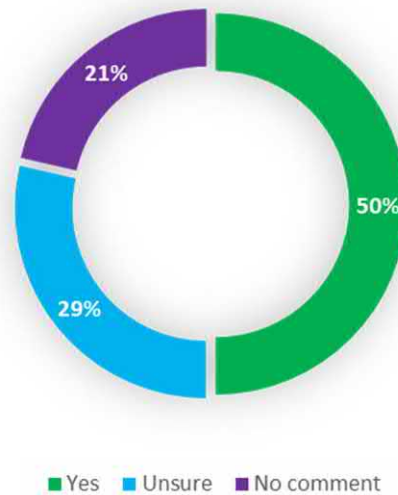
- The maps provided were easy to read to locals.
- Many options were demonstrated but no confirmed route explained.
- The situation has been explained.
- The writing under the structure is difficult to decipher.
- Process demonstrates no route is acceptable for OHL. Especially conclusion that line should stay the same at Pucks Glen.
- Maps are useful but a stronger colour variance would be more helpful.
- The maps are too small to read .

Q6. Do you agree with our Preferred Alignment for the following sections? Please provide a sentence to explain your answer.

Out of 14 people, 6 decided to comment on this, comments included;

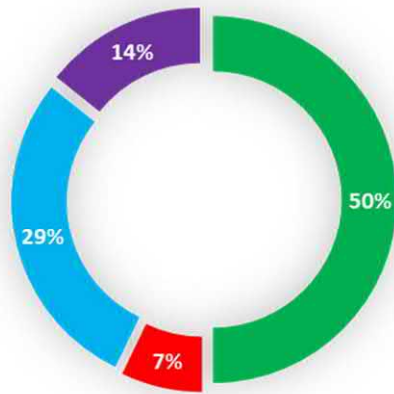
- It is close to the existing OHL.
- There is no perfect option – there is no reason to change your option.
- Agreement with the alignment as long as wildlife are not directly affected.
- Not local enough to choose for all 6 sections.
- It follows the existing overhead line which are clearly visible from my house, preference would be 5A or 5B.
- On person questioned SSEN Transmission on their preferred route in their comment

Q6 - Section 1



50% (7) chose yes, 21% (3) decided not to comment and 29% (4) were unsure

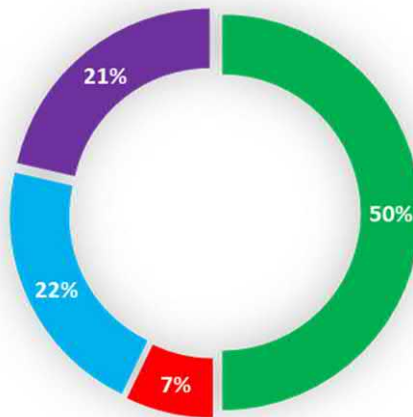
Q6 - Section 2



■ Yes ■ No ■ Unsure ■ No Comment

50% (7) chose yes, 29% (4) were unsure, 7% (1) indicated no and 14% (2) decided to leave this section blank

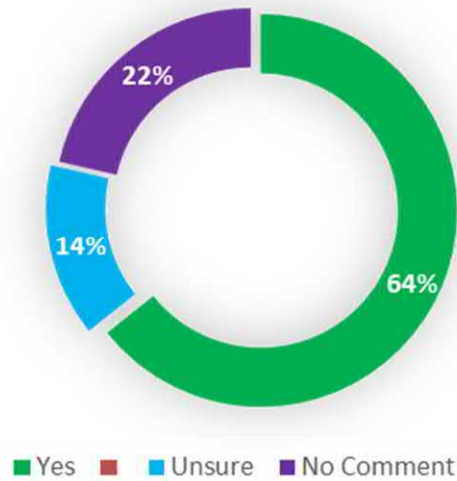
Q6 - Section 3



■ Yes ■ No ■ Unsure ■ No Comment

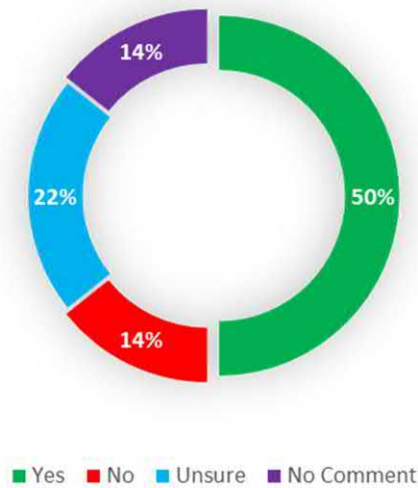
50% (7) selected yes, 7% (1) chose no, 22% (3) were unsure and 21% (3) decided to leave this section blank

Q6- Section 4



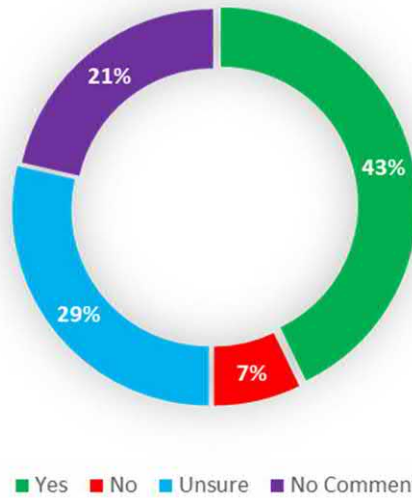
64% (9) chose yes, 14% (2) selected unsure with 22% (3) deciding to leave this section blank

Q6 - Section 5



50% (7) selected yes for this section, 22% (3) chose unsure, 14% (2) chose no and 14% (2) chose not to comment

Q6 - Section 6



43% (6) picked yes, 7% (1) selected no, 29% (4) were unsure and 21% (3) decided not to comment

**Q7. Are there any identified alignments you feel should NOT be progressed?
Please provide a sentence to explain your answer.**

9 people decided to respond to this section, 3 people picked no as their answer, other answers included;

- Do not proceed with the NeST option, keep the height of the structure as low as possible.
- No, as long as local wildlife and beauty stop are not affected, it can only be positive for the future.
- Further options needed as 3D retains current visual impact at Pucks Glen, 3C would make it worse? Further options needed.
- Other alignments are higher and more prominent in landscape.
- 2A and 2B – existing line is straight, why is there a detour?
- 5C is too close to Sandhaven homes.

Q8. Are there any factors, environmental features or important points that you believe have not been considered and should be brought to our attention?

Please provide a sentence to explain your answer

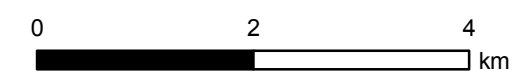
- 8 people decided to respond to this with two of the answers being 'no' other comments included;
- The whole route goes through an area where pylons should be avoided if at all possible.
- Access roads to the sites, will they be new or will existing ones be used where possible?
- Have Argyll and Bute council given consent?
- No, wildlife most important followed by local beauty spots and tourist attractions.
- Overhead cables are the cheapest method of transmission.
- Undergrounding would be the best option but costs are a problem.
- The size of the existing structures are preferable as they are not too obvious.


APPENDIX B: FIGURES



Key

- Existing Dunoon Substation
- Tower 15 on Whistlefield - Dunoon 132kV OHL
- Existing OHL

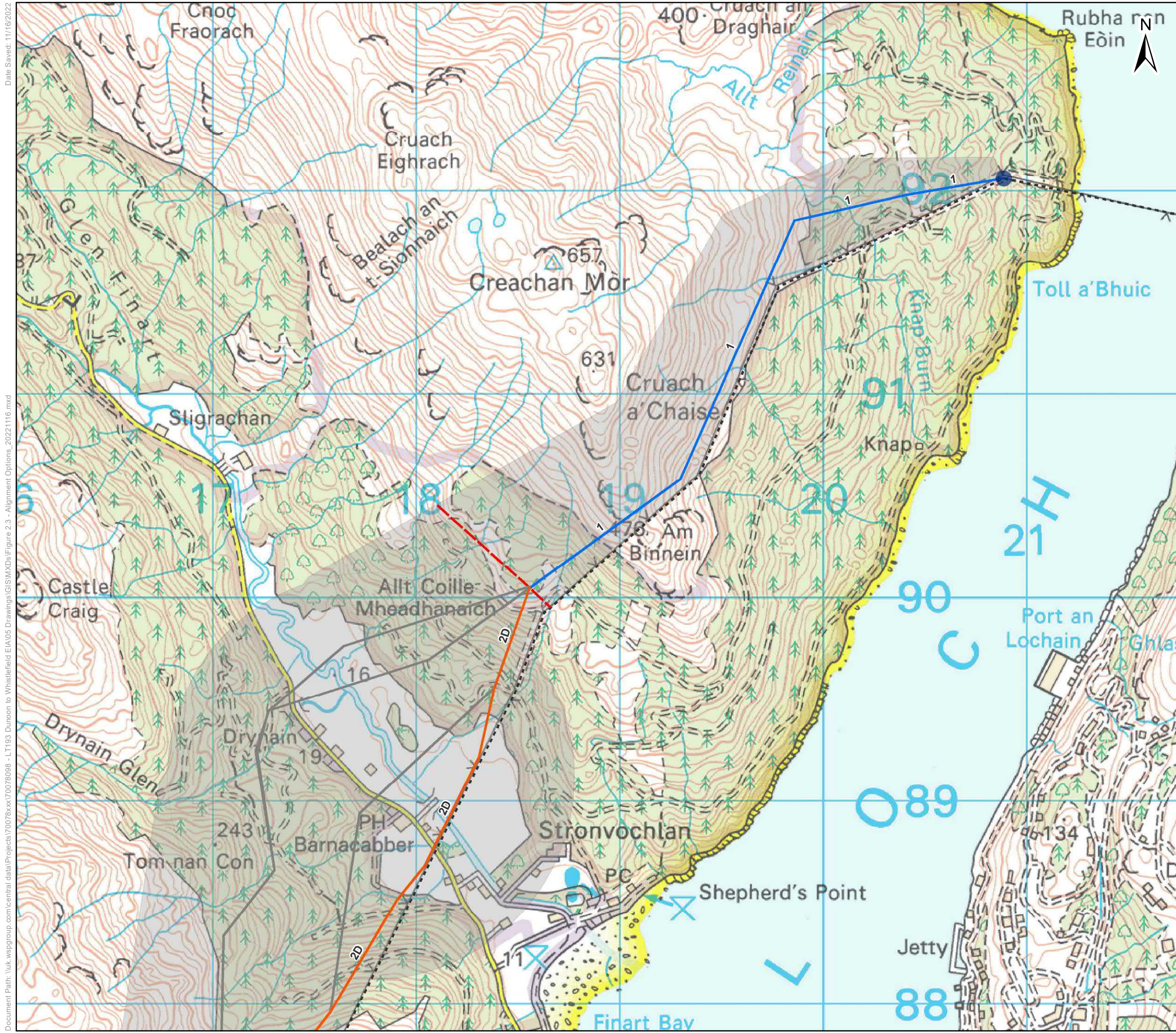


Client: 

Project: **Dunoon to Loch Long 132kV OHL Rebuild**

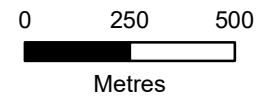
Title: **Figure 1.1 Location**

Date: 25 March 2021 Scale: 70,000 @ A3
 Drawn: EC Checked: CE Approved: JB



Key

- Tower 15 on Whistlefield - Dunoon 132kV OHL
- Existing OHL
- ▭ Proposed Route (at conclusion of formal routing stage)
- Section 1 Preferred Alignment
- Section 2 Preferred Alignment
- Other Alignments
- - - Section Split



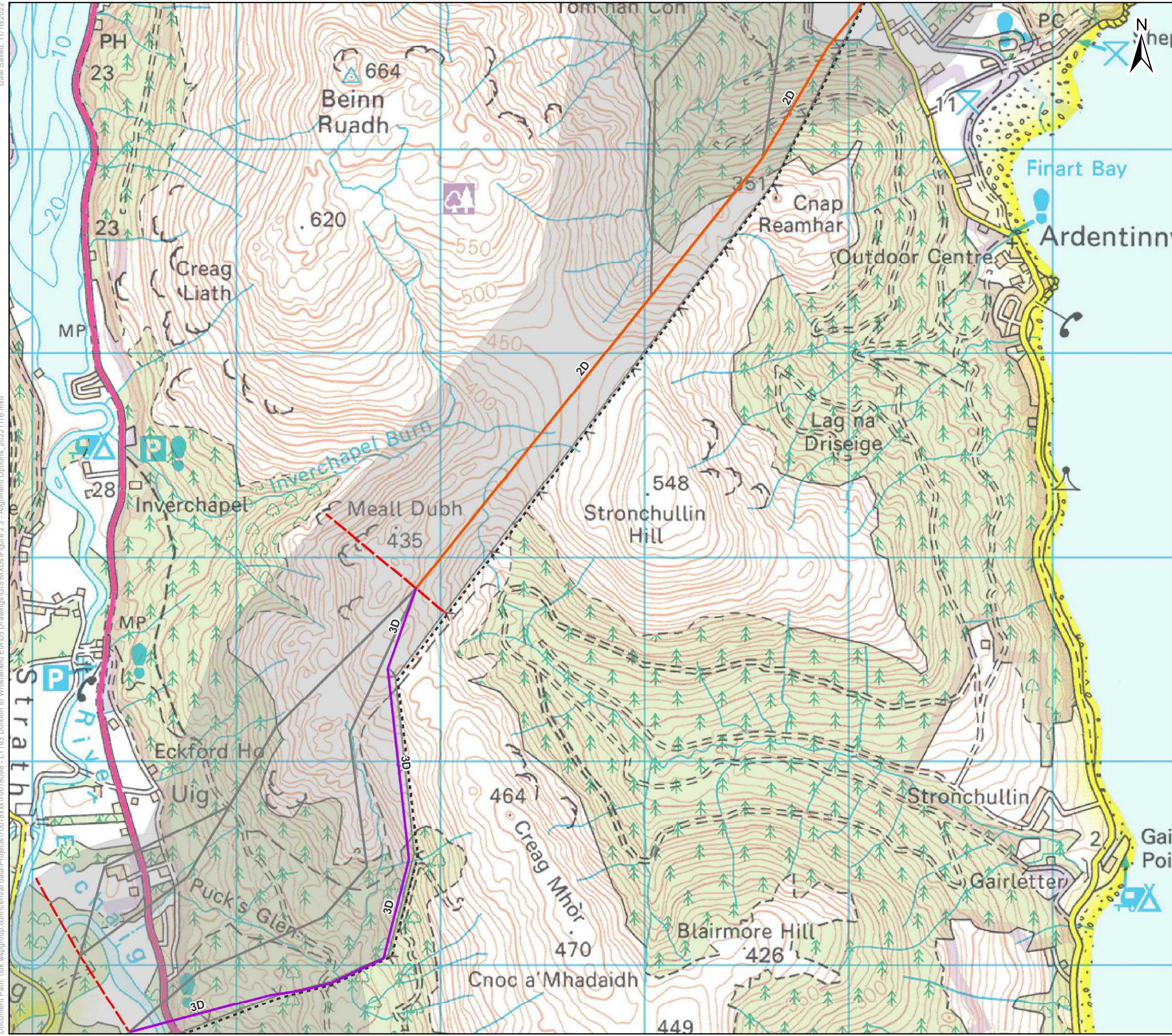
Client:  **Scottish & Southern**
Electricity Networks

TRANSMISSION

Project: Dunoon to Loch Long 132kV OHL Rebuild

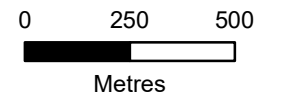
Title: **Figure 3.1**
Alignment Options and Preferred Alignment
Sheet 1 of 4

Date: 11/16/2022 Scale: 18,000 @ A3
Drawn: MAL Checked: JA Approved: SM



Key

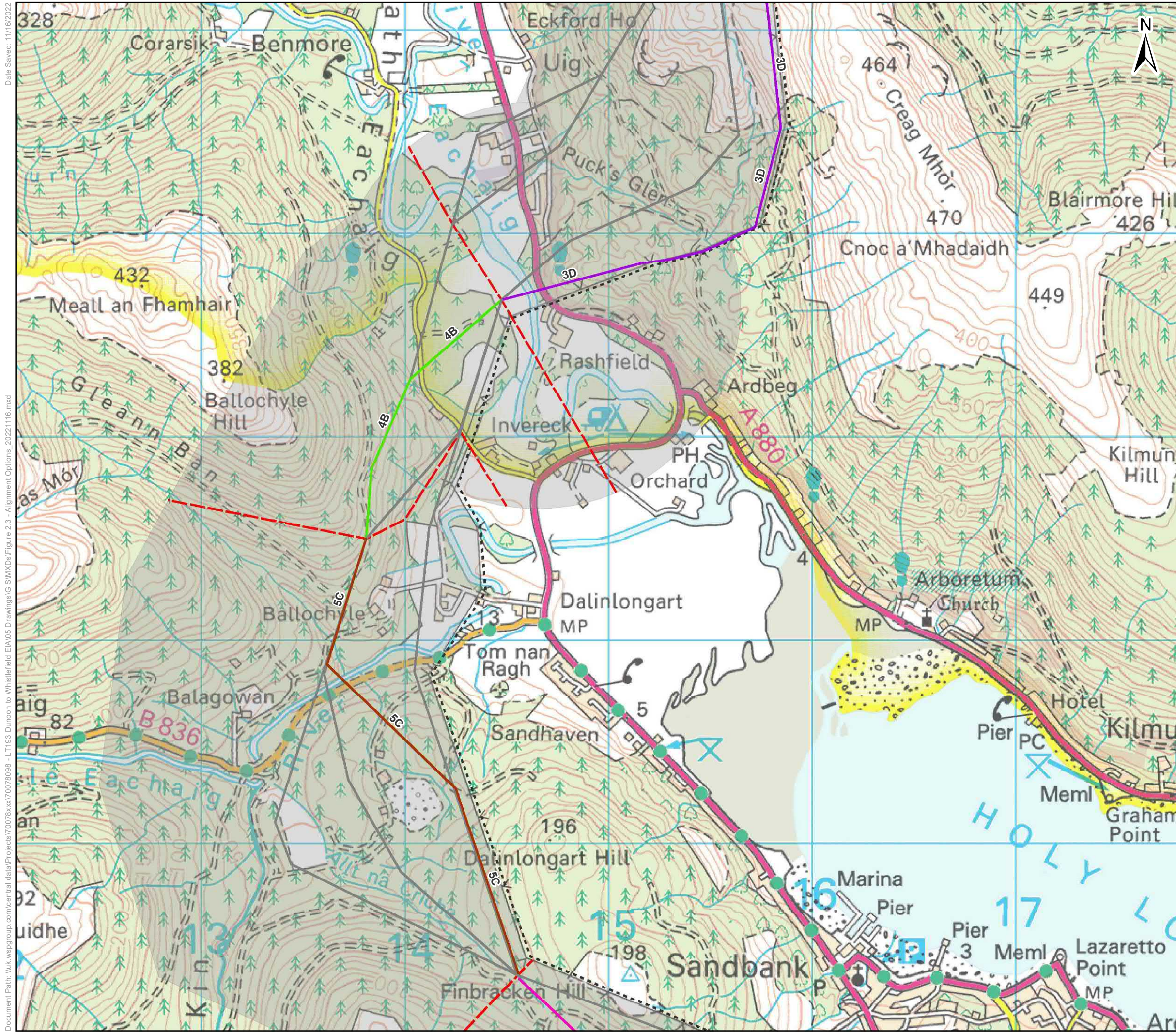
- Existing OHL
- Proposed Route (at conclusion of formal routing stage)
- Section 2 Preferred Alignment
- Section 3 Preferred Alignment
- Section 4 Preferred Alignment
- Other Alignments
- Section Split



Client: **Scottish & Southern Electricity Networks**
TRANSMISSION

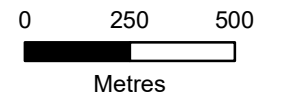
Project: Dunoon to Loch Long 132kV OHL Rebuild
Title: Figure 3.1 Alignment Options and Preferred Alignment Sheet 2 of 4

Date: 11/16/2022 Scale: 18,000 @ A3
Drawn: MAL Checked: JA Approved: SM



Key

- Existing OHL
- Proposed Route (at conclusion of formal routing stage)
- Section 3 Preferred Alignment
- Section 4 Preferred Alignment
- Section 5 Preferred Alignment
- Section 6 Preferred Alignment
- Other Alignments
- - - Section Split



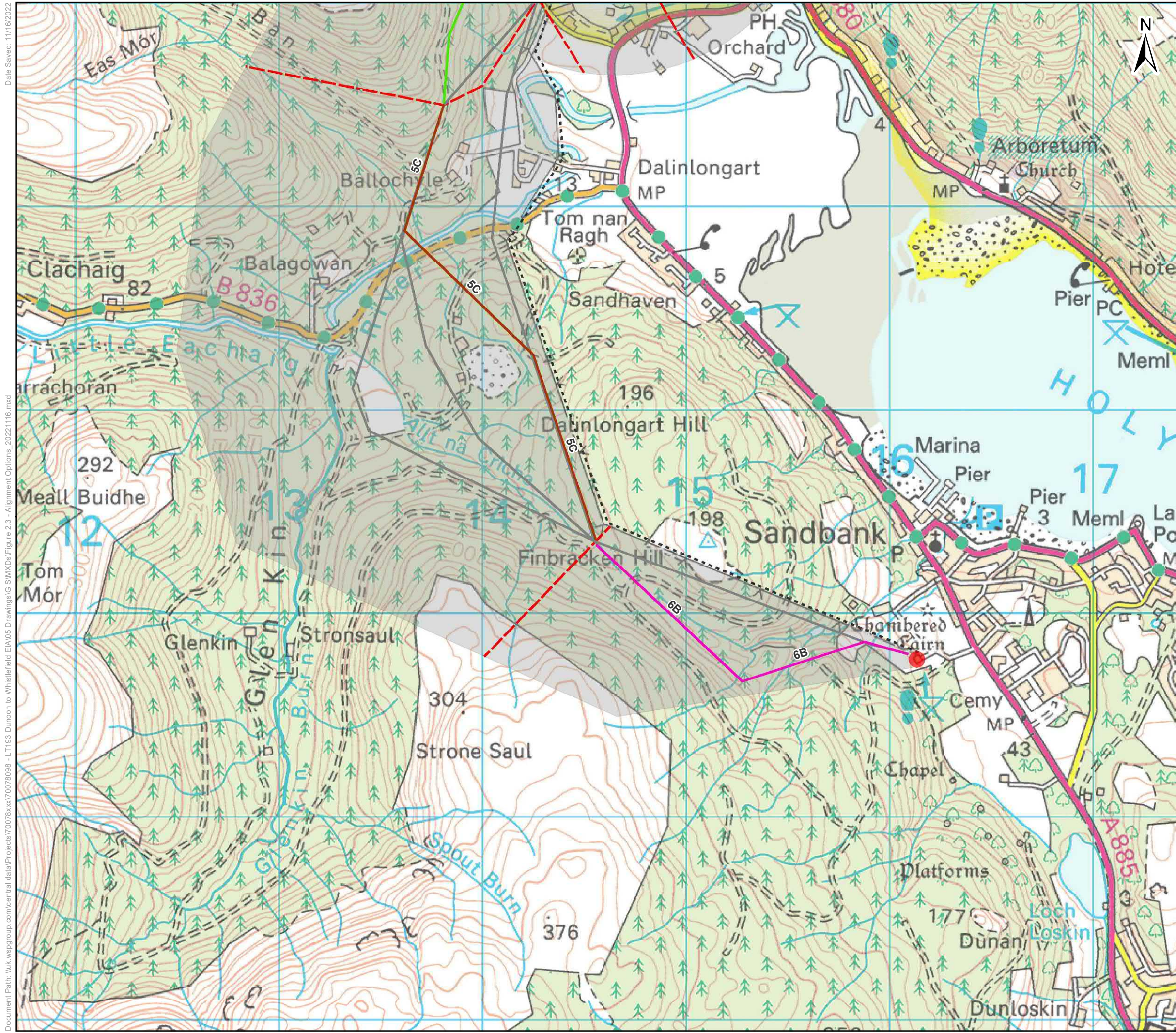
Client: **Scottish & Southern**
Electricity Networks

TRANSMISSION

Project: Dunoon to Loch Long 132kV OHL Rebuild

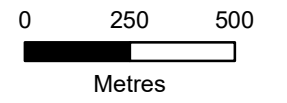
Title: Figure 3.1
Alignment Options and Preferred Alignment
Sheet 3 of 4

Date: 11/16/2022 Scale: 18,000 @ A3
Drawn: MAL Checked: JA Approved: SM



Key

- Existing Dunoon Substation
- Existing OHL
- ▭ Proposed Route (at conclusion of formal routing stage)
- Section 4 Preferred Alignment
- Section 5 Preferred Alignment
- Section 6 Preferred Alignment
- Other Alignments
- - - Section Split



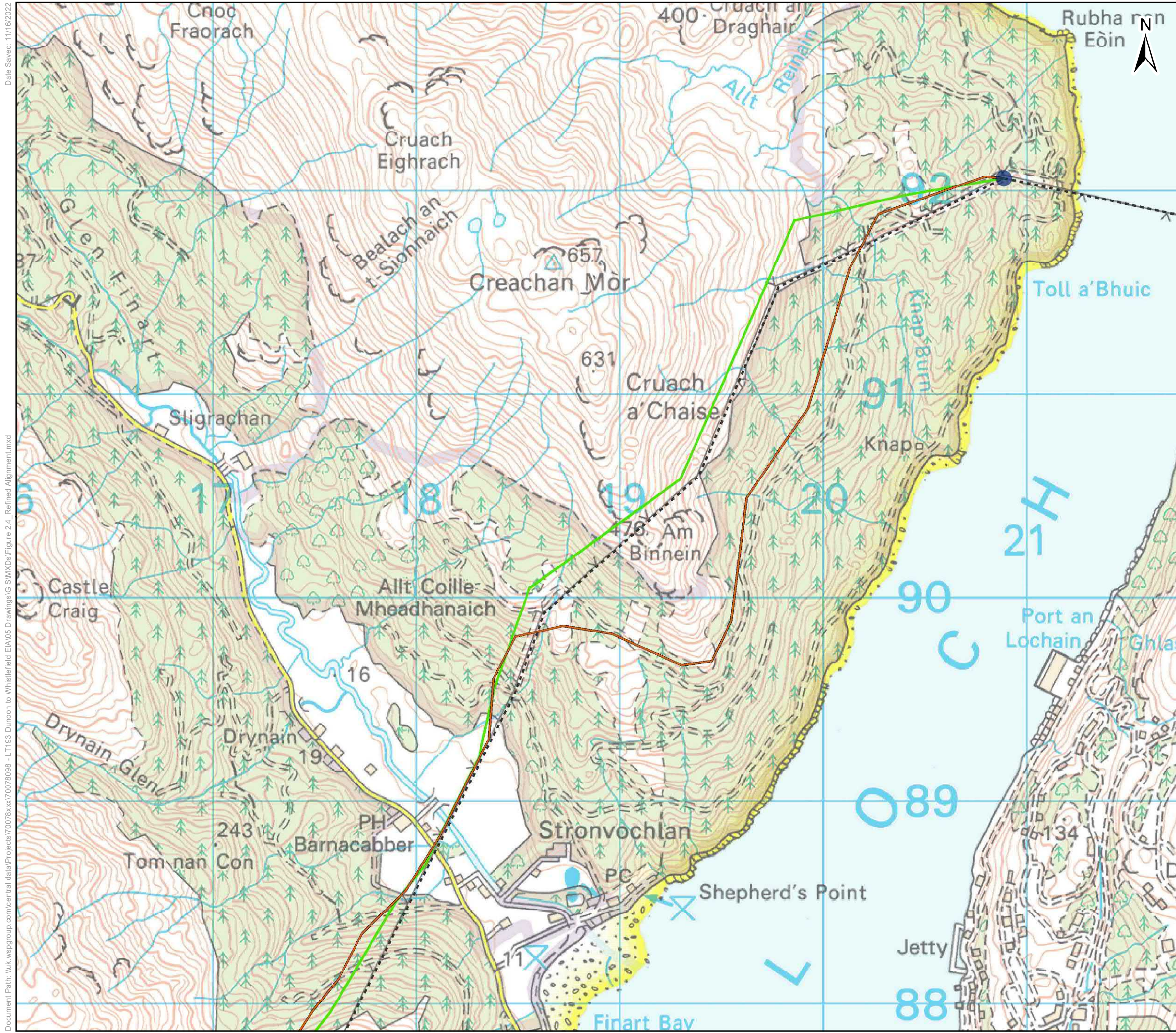
Client: **Scottish & Southern**
Electricity Networks

TRANSMISSION

Project: Dunoon to Loch Long 132kV OHL Rebuild

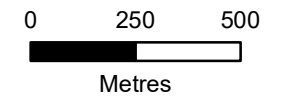
Title: **Figure 3.1**
Alignment Options and Preferred Alignment
Sheet 4 of 4


Date: 11/16/2022 Scale: 18,000 @ A3
 Drawn: MAL Checked: JA Approved: SM



Key

- Tower 15 on Whistlefield - Dunoon 132kV OHL
- Existing Dunoon Substation
- Existing OHL
- Proposed OHL Alignment
- Preferred OHL Alignment



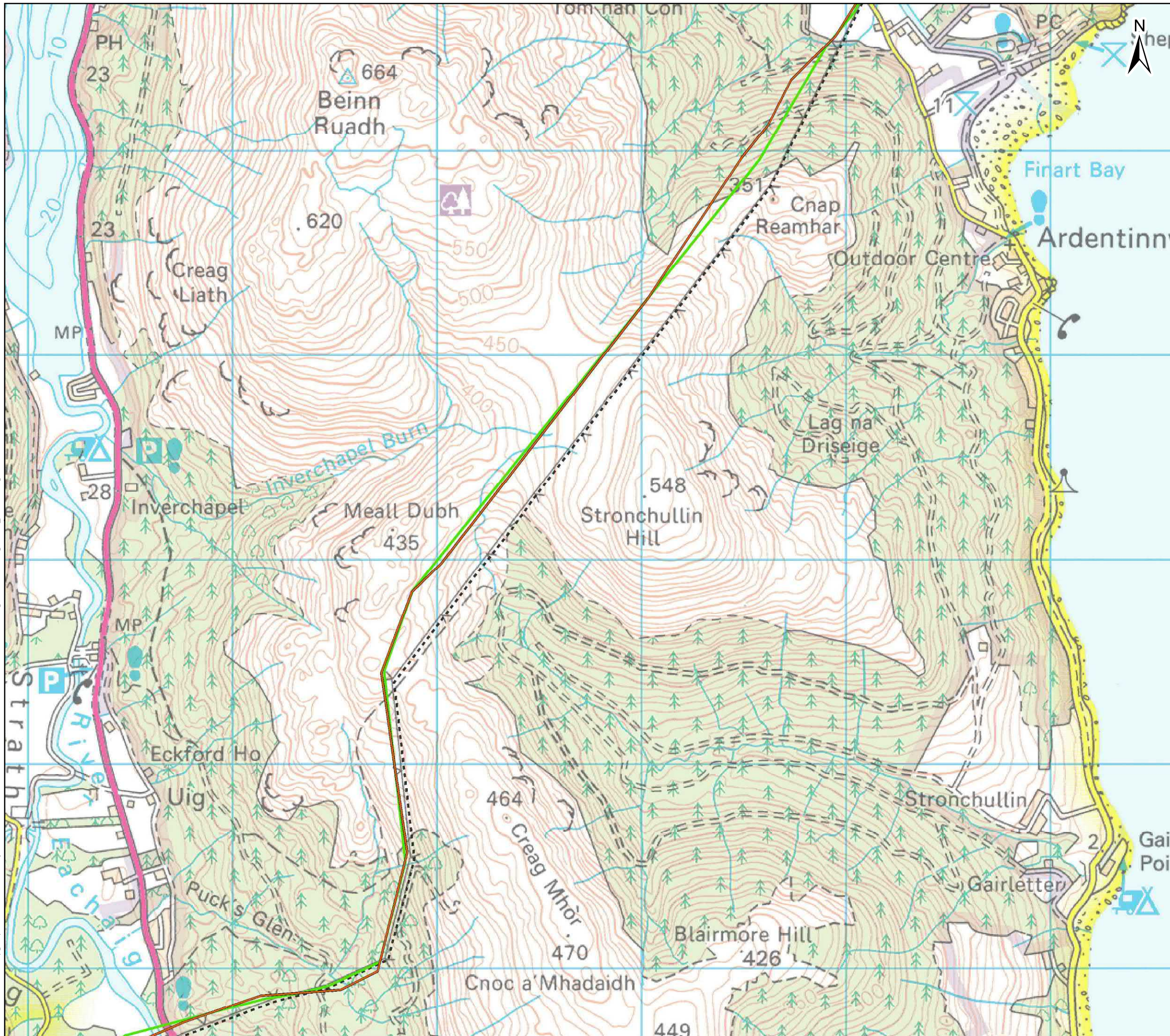
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Electricity Networks

TRANSMISSION

Project: **Dunoon to Loch Long 132kV OHL Rebuild**

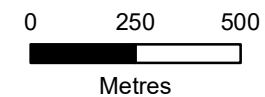
Title: **Figure 7.1
Proposed Alignment
Sheet 1 of 4**

Date: Wednesday, November 16, 2022 scale: 18,000 @ A3
 Drawn: MAL Checked: JA Approved: SM



Key

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- Existing Dunoon Substation
- Existing OHL
- Proposed OHL Alignment
- Preferred OHL Alignment

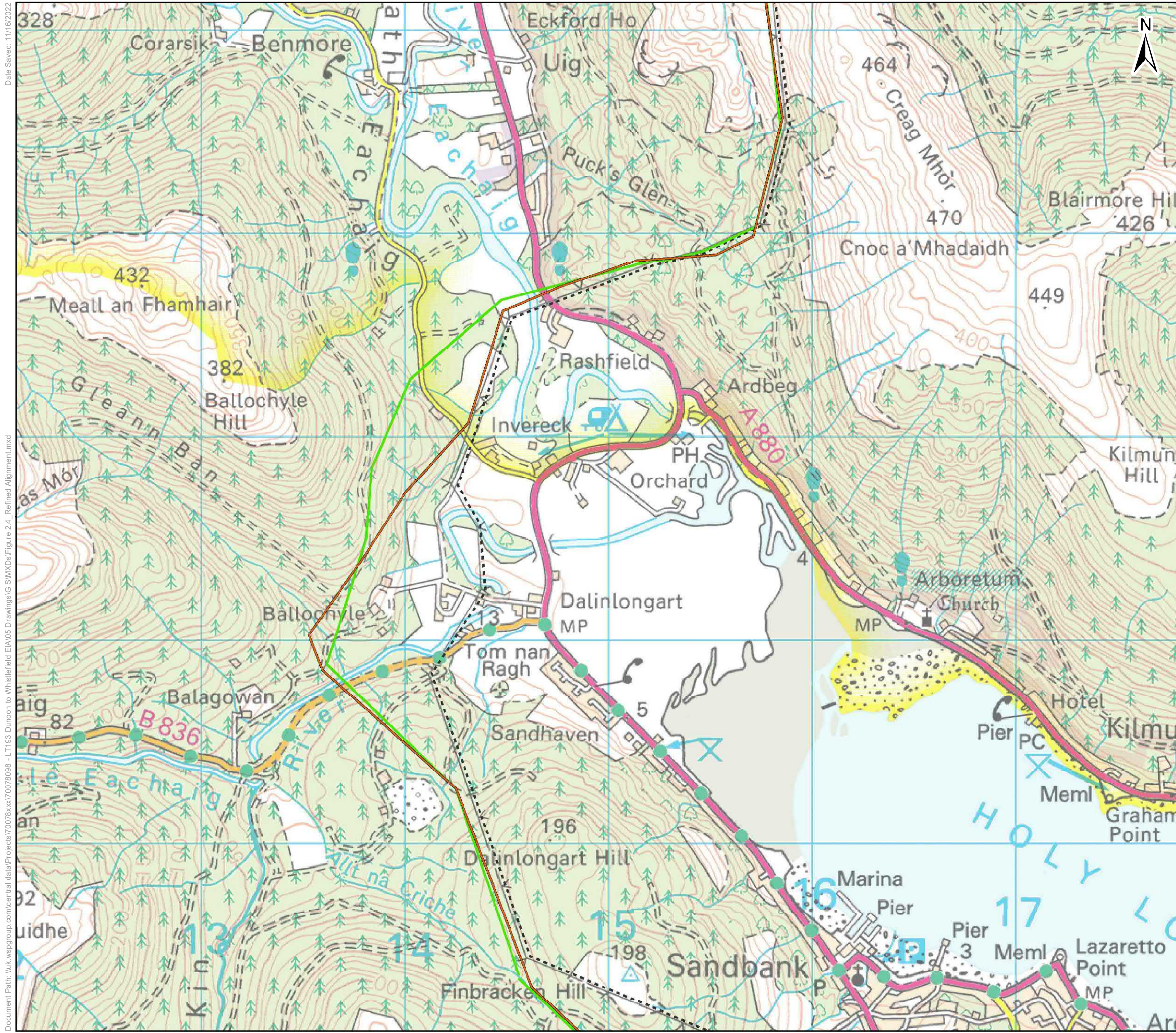


Client: **Scottish & Southern**
Electricity Networks
TRANSMISSION

Project: **Dunoon to Loch Long 132kV OHL Rebuild**

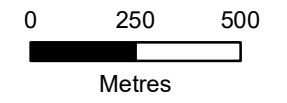
Title: **Figure 7.1
Proposed Alignment
Sheet 2 of 4**


Date: Wednesday, November 16, 2022 scale: 18,000 @ A3
Drawn: MAL Checked: JA Approved: SM



Key

- Tower 15 on Whistfield - Dunoon 132kV OHL
- Existing Dunoon Substation
- Existing OHL
- Proposed OHL Alignment
- Preferred OHL Alignment

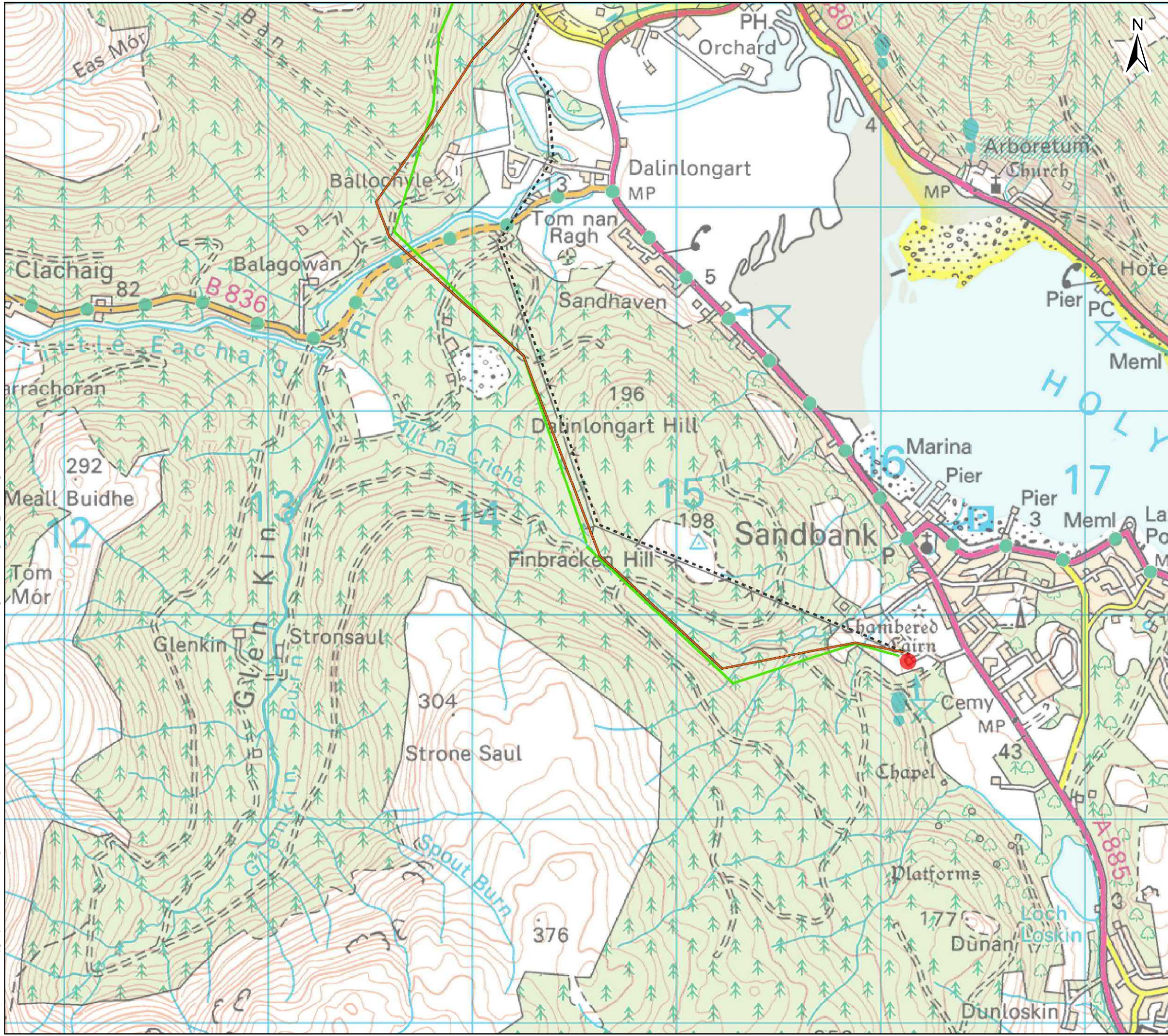


Client:  **Scottish & Southern**
Electricity Networks

Project: **Dunoon to Loch Long 132kV OHL Rebuild**

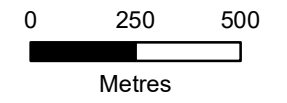
Title: **Figure 7.1
Proposed Alignment
Sheet 3 of 4**


Date: Wednesday, November 16, 2022 scale: 18,000 @ A3
Drawn: MAL Checked: JA Approved: SM



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Client:  **Scottish & Southern**
Electricity Networks

Project: **Dunoon to Loch Long 132kV OHL Rebuild**

Title: **Figure 7.1
Proposed Alignment
Sheet 4 of 4**

Date: Wednesday, November 16, 2022 scale: 18,000 @ A3
 Drawn: MAL Checked: JA Approved: SM