

Dunoon to Loch Long 132 kV OHL Rebuild Environmental Impact Assessment Volume 4 | Technical Appendix

Appendix 4.5 – Gatecheck Report





T R A N S M I S S I O N

Scottish Hydro Electric Transmission plc

Dunoon to Loch Long 132 kV OHL Rebuild

Gatecheck Report

November 2022





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List of Abbreviations

BNG	Biodiversity Net Gain
CEMP	Construction Environmental Management Plan
ECoW	Environmental Clerk of Works
ECU	Energy Consents Unit
EIA	Environmental Impact Assessment
EIA Report	Environmental Impact Assessment Report
GDL	Gardens and Designed Landscapes
GEMP	General Environmental Management Plan
GWDTE	Groundwater Dependent Terrestrial Ecosystems
HES	Historic Environment Scotland
LLTNP	Loch Lomond and the Trossachs National Park
LVIA	Landscape and Visual Impact Assessment
MCA	Marine and Coastguard Agency
NRTF	National Road Traffic Forecasts
OHL	Overhead Line/s
PLHRA	Peat Landscape Hazard Risk Assessment
PWS	Private Water Supply
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SEPA	Scottish Environment Protection Agency
SSEN	Scottish and Southern Electricity Networks
6661	Cite of Curreiel Colombifie Internet

SSSI Site of Special Scientific Interest



1 INTRODUCTION AND BACKGROUND

1.1 Introduction

- 1.1.1 This Gatecheck Report 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. (SHE Transmission). SSEN Transmission, hereafter referred to as 'the Applicant', submits this report in advance of an application to the Scottish Ministers under Section 37 of The Electricity Act 1989 for consent to replace the overhead line (OHL) between the existing Dunoon substation and Tower 15, to the west of the Loch Long crossing.
- 1.1.2 The project is referred to as the Dunoon to Loch Long 132 kV OHL Rebuild (and hereafter as 'the Proposed Development'). The location of the Proposed Development is shown on Figure 1.1: Location Plan and Overview.
- 1.1.3 The application for consent for the Proposed Development will be supported by an Environmental Impact Assessment (EIA) Report. A Scoping Report setting out the proposed scope of the EIA was submitted to the Scottish Ministers on 16th February 2022 with a request for a formal Scoping Opinion¹. A Scoping Opinion was subsequently issued by the Scottish Ministers in July 2022.
- 1.1.4 The purpose of this Gatecheck Report is to satisfy the requirements of the gate checking procedures for Applications under Section 37 of The Electricity Act 1989, namely to outline consultations with statutory and non-statutory consultees, engagement with the local community and how matters raised during the scoping process have been addressed in the EIA Report.

1.2 Background to the Proposed Development

- 1.2.1 Dunoon is currently connected to the wider electricity grid network by a twin 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).
- 1.2.2 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 OHL to the west of the Loch Long crossing connecting to Dunoon substation is within SHE Transmission's licenced area, whilst the OHL on the east of the Loch Long crossing is maintained and operated by Scottish Power Energy Networks.
- 1.2.3 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 existing OHL route crosses some very steep and exposed terrain, and has a very high fault rate associated with it during high winds due to the design of tower used in the original build. The Applicant has established a requirement to replace the OHL between the existing Dunoon substation and the Loch Long crossing to ensure security of supply and to meet their statutory duties to provide a resilient and reliable transmission network.

1.3 THE PROPOSED DEVELOPMENT

- 1.3.1 The Proposed Development comprises of the following works to the west of the Loch Long crossing:
 - Erection of a replacement twin circuit 132 kV steel lattice OHL, between the existing Dunoon substation and existing Tower 15, to the west of the Loch Long crossing; and

¹ Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017



- Erection of temporary single circuit wood pole 132 kV OHL diversions.
- 1.3.2 The proposed alignment of the replacement OHL is hereafter referred to as the 'proposed OHL alignment' and is illustrated in **Figure 1.2**; it is approximately 18 km in length and will be supported by steel lattice towers as is the existing OHL, but of more modern design.
- 1.3.3 Certain associated works will also be required including:
 - Works associated with establishing access for the construction and maintenance of the OHL, such as
 vegetation clearance; upgrading of existing tracks or establishment of new access tracks (permanent and
 temporary); and road and other infrastructure such as junction bell-mouths and (bridges, culverts etc.)
 alterations;
 - Formation of flat areas from which the conductor will be pulled during construction, which will contain earthed metal working surfaces referred to as Equipotential Zones;
 - Woodland removal to accommodate the Proposed Development, and temporary infrastructure; and
 - Measures to protect road and water crossings during construction (scaffolding etc.).
- 1.3.4 The following works are also required to complete the full refurbishment of the OHL from Dunoon substation to Whistlefield, however they are being consented under different regimes and therefore do not form part of the Proposed Development for this application and EIA Report. They will however be considered in terms of cumulative development in the assessment:
 - Any upgrades required to the special crossing structures or their foundations (T12 T15);
 - Reconductoring of the existing Loch Long crossing, 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. This reconductoring over Loch Long is subject to separate consent under the Marine
 (Scotland) Act 2010²; and
 - Removal of the existing OHL conductors and dismantling of redundant towers.

2 CONSULTATION

2.1 EIA Scoping

2.1.1 A Request for Scoping Opinion¹ was submitted to Scottish Ministers on 16th February 2022 on the environmental information to be provided in the EIA Report. A Scoping Opinion was issued by the Scottish Ministers dated 19th July 2022. The responses, contained within the Scoping Opinion, were considered in detail during the EIA process.

2.2 Post Scoping Consultation

- 2.2.1 Noise assessment methodology was agreed through consultation with the Environmental Health Officers at Argyll and Bute Council and consultations are ongoing with the Energy Consents Unit regarding the proposal to scope out operational noise assessment.
- 2.2.2 Viewpoint locations for the landscape and visual impact assessment were agreed with Argyll and Bute Council and Loch Lomond and the Trossachs National Park (LLTNP) Authority, and for the cultural heritage assessment agreed with Historic Environment Scotland.

² The Marine (Scotland) Act 2010

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2.3 Alternative Northern Route Consultation

2.3.1 During the EIA Scoping consultation, a change in the design to include an alternative northern route for the replacement OHL necessitated re-consultation with the Scottish Government Energy Consents Unit (ECU) and key stakeholders. An updated Figure 2.1 of the Overhead Line Route was issued along with covering email on 5th May 2022 to the ECU who reconsulted with key stakeholders on the Scoping request. The Scoping Request report and elements within were not affected by the change in route for the proposed replacement OHL, although an additional Viewpoint was agreed to be added.

2.4 Application of Statutory Consultation Responses

- 2.4.1 The responses contained within the Scoping Opinion, Post-Scoping Consultation and Alternative Northern Alignment Scoping have been considered in detail during the EIA process. **Appendix 1** of this report includes a matrix detailing the key issues that were raised during these consultations and how and where they will be addressed in the EIA Report.
- 2.4.2 This Gatecheck Report will be included in the EIA Report.

2.5 Community Engagement

2.5.1 In parallel with the statutory consultation process, consultation with the local communities has been undertaken at routing and alignment stages to inform and keep the local community up to date with the Proposed Development.

Public Consultation

Routeing stage

2.5.2 Following advertisement in local newspapers, a press release, social media notices, e-mail to community councils, councillors, MPs and MSPs and distribution of a consultation booklet to 6397 properties and businesses along the OHL Route, two public consultation events were undertaken on 3rd November 2020. In compliance with current Scottish Government guidelines on public consultation during this period³, the event was held online only. A dedicated public consultation section on SSEN Transmission's webpage for the project was made available, which provided information on the background, description, need and potential impacts of the Proposed Development, amongst other information. Representatives from the project team were also available to assist with specific queries. The consultation period opened on Monday 2nd November and continued until Friday 4th December 2020.

Alignment Stage

- 2.5.3 The same consultation process was undertaken at the alignment stage and advertised in the same way. Three public consultation events were undertaken between 25th August and 8th September 2021. Members of the public were given until the 24th September 2021 to provide feedback.
- 2.5.4 Responses to both the public consultation events have been recorded in a separate Report on Consultation (one report for each stage) which details how the responses were taken into consideration. The alignment stage report will accompany the application for consent.

³ Coronavirus (COVID-19): development planning consultation and engagement advice – May 2020.



Proposed alignment

- 2.5.5 During refinement of the alignment in the northern section a public information event was held in Dunoon on the 30th and 31st August 2022. This was the first in person event permitted after the pandemic and provided an opportunity to the local community to view information and discuss the proposals with the project team in person. However, the event did not present the eventual proposed alignment due to ongoing refinement in the northern section to reduce forestry impacts in consultation with the landowner.
- 2.5.6 An information event where the Proposed Development will be presented to the public is proposed on the 14th December 2022, in line with the ECU guidance on public consultation of the EIA supported Section 37 application.



Appendix 1: Summary of EIA Scoping Responses and Action Taken

Consultee	Scoping Comment	Scoping Opinion Page Ref.	EIA Report Reference	Response
Energy Consents Unit	Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.	5	Chapter 10: Hydrology, Hydrogeology, Geology and Soils	The EIA Team in Scottish Proposed Development of Scottish Water assets in a
Energy Consents Unit	Scottish Ministers request that the Company investigates the presence of any private water supplies (PWS) which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided. In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.	5	Chapter 10: Hydrology, Hydrogeology, Geology and Soils	An assessment on Private Sensitive receptors hydro been included in the asse been identified with fish portential for likely signif
Energy Consents Unit	Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at http://www.gov.scot/Publications/2017/04/8868, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. The Scoping Report submitted was referred to Ironside Farrar commissioned by the ECU to provide advice regarding PLHRA and relative to the potential risks posed by peat slides. Scottish Ministers agree with Ironside Farrar that a PLHRA will be required. Please note Ironside Farrar's comments in regards to PLHRA included at Annex A.	6	Chapter 10: Hydrology, Hydrogeology, Geology and Soils	Noted. A PLHRA will be submitte
Energy Consents Unit	The scoping report identified preliminary viewpoints at paragraph 4.6.17 and at Figure 4.1. to be assessed within the landscape and visual impact assessment, an additional viewpoint was also identified in the additional information provided. Please note Loch Lomond and the Trossachs National Park Authority's comments regarding landscape and visual impacts (including seascape).	6	Chapter 6: Landscape and Visual	13 viewpoints were prop subsequently added, one Park Authority for the re Glen Finart as requested
Energy Consents Unit	Scottish Ministers agree with the Argyll and Bute Planning Authority that the EIA should include a description of the reasonable alternatives (in terms of project design, technology, location, size and scale studied by the developer, which are relevant to the proposal and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. Please note Loch Lomond and the Trossachs National Park Authority and NatureScot's comments regarding the potential for cumulative effects including forestry management, associated infrastructure and access and works under different consenting regimes). Also that a construction timeline for the full duration of works (including restoration and removal of the existing OHL) should also form part of the EIA. Ministers agree that the EIA report should address these matters.	6	Chapter 2: Consideration of Alternatives	Reasonable alternatives
Energy Consents Unit	Scottish Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.	7	Chapter 6-13	Further engagement with been undertaken as nece Outstanding queries (e.g Energy Consents Unit.
Energy Consents Unit	Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.	7	Chapter 6-14 and Chapter 15: Schedule of Mitigation	Mitigation measures are in a summary table.
Energy Consents Unit	When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.	8	Appendix 4.3: Gatecheck Report	This Gatecheck report fo appendix to the EIA Repo

tish Water has been consulted and they confirmed the nt does not encroach within the Loch Eck catchment. in general will be considered at the detail design stage.

vate Water Supplies will be included within the EIA Report. ydrologically linked to the Proposed Development have assessment where applicable. No downstream SACs have ish as qualifying features which are considered to have the gnificant effects.

itted as part of the EIA Report.

roposed at EIA Scoping stage. A further two have been one agreed with Loch Lomond and the Trossachs National e revised northern alignment and one at Dun Daraich Fort, ted by Historic Environment Scotland.

es have been included in the EIA Report.

with statutory and non-statutory consultees has

ecessary to complete the scoped in assessments.

e.g. operational noise) have been dealt with through the

are detailed in each assessment chapter and provided

t forms that function and will be included as an eport.



Consultee	Scoping Comment	Scoping Opinion Page Ref.	EIA Report Reference	Response
Argyll and Bute Council	 The scoping report has been reviewed and the following comments/observations are made: The EIA should include a description of the reasonable alternatives studied by the developer; The EIA should identify the location of all built elements, including access tracks and any related borrow pits, both temporary and permanent; The EIA will take into account applicable legislation, policy and guidance in relation to renewable energy, including Argyll and Bute's Energy Action Plan and Wind Energy Capacity Study; The Council will defer to the National Park Authority for consultation on the landscape impacts on Loch Lomond and the Trossachs National Park. Regarding other landscape impacts, the LVIA approach outlined in the scoping report is deemed acceptable; The approach to cultural heritage assessment as outlined in the scoping report is deemed acceptable; The Panning Authority agrees that the construction effects on ecology and biodiversity are likely to be temporary, low-magnitude and localised, and that embedded mitigation in the design will alleviate these impacts. It is also recognised that consultation with NatureScot and the RSPB regarding previously conducted ornithological survey; The ECU is requested to evaluate whether the assumptions used in this referenced noise model are robust, to justify scoping out the operational noise characteristics associated with the proposal and specialist knowledge on the inputs/assumptions and conclusions of this this evaluation will be required to consider whether such an approach is reasonable for the EIA and these matters can be scoped out Regarding noise and vibration, it is acceptable that the applicants will consult with Argyll and Bute Council to agree the final assessment methodology and that the assessment will focus on likely significant effects arising from the construction phase of the development; and It is agreed that forestry woodland will be impacted by the proposed develo	A1	Chapter 2: Consideration of Alternatives Chapter 3: Proposed Development Chapter 6: Landscape and Visual and Chapter 7: Ecology and Nature Conservation Chapter 8: Ornithology Chapter 9 Cultural Heritage Chapter 10: Hydrology, Hydrogeology, Geology and Soils Chapter 11: Noise and Vibration Chapter 12: Forestry	All information is include Plan' and 'Wind Energy (this development which Awaiting response from in terms of the scoping o
Argyll and Bute Council	It is noted that at 10.7.2 it is stated that "Compliance with the CoWRP through compensatory planting of the woodland removal area would achieve an overall no net loss of woodland". Further clarification on the mechanism to achieve necessary replanting is considered to be necessary through the EIA submissions and not left as a matter for a deemed planning condition.	A10	Chapter 12: Forestry	Addressed in Compensa
Argyll and Bute Council	Regarding Transport and Traffic, further discussions with the Council Area Roads manager is recommended before the study methodology is finalised. Further discussions on the defined study area for the assessment and predicted HGV movements is required on this matter to form part of the EIA submission. Consultation with the ECU, Transport Scotland and the Area Roads Manager prior to any Transport Assessment submission should be undertaken to ensure cumulative impacts on the road network is considered. Also, the location of borrow pits which may provide construction materials should be identified before the submission of any Transport Assessment, as this has resulted in significant post assessment work in the past.	A11	Chapter 13: Traffic and Transport	Response noted, attemp regarding the scope of w
Argyll and Bute Council	 Consultation with Argyll and Bute Council regarding confirmation of the Noise Assessment Methodology by e-mail 12th September 2022 and subsequent telephone converstation. Request for inclusion of rock-breaking activities Scoping out of operational noise deferred to the Scottish Government Clarifications on minor points 	N/A	Chapter 11: Noise and Vibration	Assessment takes into co breaking activities. The Government for confirm
Loch Lomond and the Trossach's	 The proposed development has been reviewed and the following observations are raised: The EIA will consider the Loch Lomond and the Trossachs National Park Local Development Plan 2017. The four statutory aims of the National Park and the National Park Partnership Plan (2018-2023); 	A13	Chapter 14: Cumulative Assessment	Cumulative effects of the conseting regiemes are i

uded with the exception of 'Argyll and Bute's Energy Action gy Capacity Study' which are not considered applicable to ich is not a renewable energy generation development.

om the ECU regarding the acceptability fo the noise model og out of operational noise assessment.

satory Planting Strategy.

mpts have been made to liasie with Argyll and Bute Council of works, however no response has been recieved to date.

o consideration additional requirements such as rockhe scoping out of Operational Noise is with the Scottish irmation; response awaited.

the Proposed Development with works under the different re included within the EIA Report.



Consultee	Scoping Comment	Scoping Opinion Page Ref.	EIA Report Reference	Response
National Park Authority (LLTNP)	 The EIA will contain information specific in Regulation 5 and Schedule 4 of the 2017 regulations which is relevant to the environmental features likely to be impacted; Regarding reasonable alternatives, an opportunity to combine objectives of the proposed development and the RIIO-T2 VISTA policy which SSEN Transmission are current consulting the authority on should not be missed; Works under different conseting regimes, such as the dismantling of existing towers, should be included within the cumulative effects assessment; Despite recreation and tourism being scoped out, the inclusion of an outdoor access plan is welcomed; and A non technical summary should accompany the EIA. 		Chapter 15: Schedule of Mitigation	The commitment to the Construction Environmen Report. RIIO-T2 VISTA funding is infrastructure. Please ref vista_riio-t2_policy. A non technical summary
LLTNP Authority	Effects on Seascape should also be considered within the landscape assessment due to the proposed development's proximity to Loch Long. Would welcome photomontages from all 13 viewpoints and recommended that the magnitude of the of landscape change from each viewpoint is assessed.	A17	Chapter 6: Landscape and Visual	The LVIA considers the en- have been provided from Scoping) however it was representation of the eff illustrate the assessment considered. The assessm terms of the effect on ea
LLTNP Authority	Cumulative effects of felling with ongoing felling of diseased larch trees should be assessed. Opportunities for ecological and landscape enhancement along the existing OHL corridor should also be explored.	A17	Chapter 6: Landscape and Visual and Chapter 7: Ecology and Nature Conservation Chapter 12: Forestry,	The landscape effects of assessment of the effect Landscape Unit. The cumulative effects or as part of the EIA Forestr assessment of the propo landscape. Landowner or undertaken in association design requirments. To H The dismantling and rem scope of this EIA. These Environmental Appraisal Report and will be report document which will cov Development. This docu and landscape enhancem
LLTNP Authority	It is recommended that biodiversity net gain (BNG) as opposed to no net loss should be the overall aim of the project; and habitat surveys carried out in support of the proposal should seek to identify the presence of any bryophyte and lichen species associated with Craighoyle Woodland SSSI.	A18	Chapter 7: Ecology and Nature Conservation	BNG is being considered in a standalone BNG doc Craighoyle Woodland SS due to its distance from connectivity. No further conclusion. The Propose for the appointed ECOW and lichen species notifie the proposed developme the SSSI to help with mic
LLTNP Authority	In response to additional information provided on 05/05/2021, this does not substantially alter the previous response. The new proposed route should consider cumulative forestry impacts and the relevant viewpoints should be updated.	A22 &	N/A	Response noted.

he provision of a Outdoor Access Plan as part of the nental Management Plan (CEMP) will be included in the EIA

g is not applicable for the funding of new transmisison refer to link for further details:

cy.pdf (ssen-transmission.co.uk)

nary will be included within the EIA.

e effects on the seascape of Loch Long. Photopanoramas rom all viewpoints (15, increased from 13 identified at vas considered that five photomontages gave a balanced effects on the National Park. Viewpoints are included to ent, they are not the sole points from which effects were issment reports the effects of the change to the landscape in each landscape unit as a whole.

of the sanitation felling are being taken into account in the ect of the Proposed Development on each affected

is of felling for the Proposed Development will be assessed estry Chapter along with a forest landscape concept design oposed woodland removal areas that are prominent in the er consultation of the diseased larch tree areas is being ation with the proposed Development woodland removal To be addressed in EIA Forestry chapter.

emoval of redundant infrastructure are not covered by the se elements are to be covered by a future, separate isal. In addition, BNG is being considered alongsite the EIA ported upon in a standalone Biodiversity Net Gain cover decomissioning as well as the Proposed ocument will explore potential opportunities for ecological

cement along the existing OHL corridor, where possible.

ed separate from the EIA Report and will be reported upon document; it is not part of this Gatecheck process.

SSSI has been scoped out of assessment within the EcIA om the Proposed Development and lack of hydrological her habitat surveys are planned prior to the EcIA's osed Development's CEMP will include a recommendation oW(s) to undertake pre-construction surveys for bryophyte tified in the SSSI occurring at the location of any element of oment, including access tracks, if they are within 250 m of micro-siting of the works.



Consultee	Scoping Comment	Scoping Opinion Page Ref.	EIA Report Reference	Response
		Alternative Northern Route		
Scottish Environment Protection Agency	 We consider that the following key issues must be addressed in the EIA: Minimising impacts on peat and peatland; Avoiding good quality or rare GWDTE, and minimising overall impacts; Avoiding impacts on watercourses and other water features by ensuring suitable buffers and using best practice design crossings Additionally, if towers should be relocated within 50m of a watercourse, construction pollution should be scoped into further assessment. 	A23	Chapter 10: Hydrology, Hydrogeology, Geology and Soils	These receptors have be Hydrogeology, Geology Any works identified wit assessed within the chap
Scottish Environment Protection Agency	The alternative proposed OHL route does not affect the advice provided by SEPA on the 23/03/2022.	A28 & Alternative Northern Route	N/A	Response noted.
NatureScot	We would advise that cumulative effects are fully addressed within the EIA Report and that this assessment takes into account all elements of the projects including works outwith the corridor.	A29 & Alternative Northern Route	Chapter 14: Cumulative Assessment	Cumulative effects of th including receptors out
NatureScot	We also strongly urge SSEN to apply their future commitment of Biodiversity Net Gain to the project. We suggest that this couple be achieved through measures to control the spread of non native species in the area, the improvement of habitat for ground nesting birds, enhancing and expanding native woodland, riparian habitat, and peatland.	A29 & Alternative Northern Route	Chapter 7: Ecology and Nature Conservation	BNG is being applied thi reported in a standalon
Historic Environment Scotland	We are largely content that there is capacity for an OHL in this location that can be designed to avoid raising issues of national interest such that we would object. We do however have concerns relating to potential impacts on the setting of the Dun Daraich fort, Cowal (SM9190) scheduled monument in the vicinity of the proposed OHL.	A30	Chapter 9: Cultural Heritage	The section of the Prope Fort has been designed heritage asset.
	The route corridor (as set out in the scoping report) includes Dun Daraich fort, Cowal (SM9190) on the western side of the corridor. Prior engagement with the applicant has indicated that the alignment is likely to be routed to the eastern side of this corridor, with the applicant's preferred alignment being as close as possible to the existing OHL where it crosses the floor of the valley.			The EIA has considered assets within the baselin from the fort will be pro
	If an alignment in the west or centre of this corridor is progressed, then whilst the electricity cable itself would 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.			
	Given the proximity of the monument to the route corridor and the sensitivity of the monuments setting, it is likely that 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 given by the current OHL. This will likely mean careful positioning of the towers so that they avoid the centre of the flat valley floor and instead span so that the towers are located at the edge of the valley and therefore partially or wholly backdropped by topography in outward views from the monument.			
	A future EIA report should include visualisations looking south-east down the glen from the monument, along with visualisations showing the reciprocal view. Given the woodland cover presently on the monument, these should be taken from the immediate east of the base of the knoll that the monument is located on.			

been assessed as part of Chapter 10: Hydrology, gy and Soils of the EIA Report.

within 50m of a watercourse shown on OS 1:50,000 will be hapter in terms of construction pollution.

the Proposed Development are being fully considered utwith the corridor where indirect impacts are concluded.

this project. It runs alongside the EIA Report and will be one BNG document.

pposed Development in close proximity to the Dun Daraich ed specifically to minimise adverse impacts upon the

ed the impacts on the setting of the fort and other heritage eline, and visualisations looking south-east down the glen provided.



Consultee	Scoping Comment	Scoping Opinion Page Ref.	EIA Report Reference	Response
Historic Environment Scotland	The new information presented is an alternative alignment option for a section of the replacement OHL route. We are content that the additional information does not demonstrate any substantial change for our interests. In light of this we can confirm that Historic Environment Scotland have no additional comments to add to our previous response dated 03 May 2022.	A36	Chapter 9: Cultural Heritage	Response noted.
Aberdeen Airport	This proposal is located outwith the consultation area for Aberdeen Airport. As such we have no comment to make and need not be consulted further.	A38	N/A	Response noted.
British Telecoms	We have studied this proposal with respect to EMC and related problems to BT point-to-point microwave radio links. The conclusion is that, the Project indicated should not cause interference to BT's current and presently planned radio network unless the heights of the structures change around the active radio link. If there are any structures around the area please that change please send over the new heights and co-ordinates and we will mitigate the results.	A39	N/A	Response noted.
The Coal Planning Authority	Having checked the proposed Overhead Line Route (Figure 2.1), the area falls outside the coalfield area and therefore the Coal Authority have no specific comments or observations to make on this project. In the spirit of efficiency of resources and proportionality, it will not be necessary for you to consult the Coal Authority at any future stages of the project.	A41	N/A	Response noted.
The Coal Planning Authority	The alternative route proposed also falls outside of the coalfield area. On this bases the Planning team have no specific comments to make at this time.	A42 & Alternative Northern Route	N/A	Response noted.
Crown Estate Scotland	The Crown Estate of Scotland are not affected by the proposal and therefore have no comments to make.	A44	N/A	Response noted.
Defence Infrastructure Organisation	The application route occupies the statutory explosive safeguarding zone surrounding RNAD Coulport and is approximately 2.3 km from the centre of the storage facility at the closest proximity. Explosive Safeguarding Zones serve to define areas in the vicinity of storage sites and armed aircraft stands in which land use and building types are regulated to maintain explosives storage licensing standards. I have reviewed the documents within this scoping consultation, and it is undecided as to where the construction compounds are to be erected and therefore the MOD is unable to complete an assessment until further details are provided of the location, materials of any temporarily structures or buildings to be constructed and the numbers of planned personnel to be engaged with the development within the Explosive Safeguarding Zones. Additionally, the proposed development will occupy Low Flying Area 14 within which military fixed wing aircraft are permitted to fly down to 250 feet (76.2 metres) above terrain features. The development proposed may cause a potential obstruction hazard to these military low flying training activities. To address this impact, it may be necessary for the development to be fitted with aviation safety lighting.	A46	N/A	Response noted, no act
Edinburgh Airport	I can confirm the location of this development falls out with our Aerodrome Safeguarding zone therefore we have no objection/ comment on this proposal.	A48	N/A	Response noted
Glasgow Airport	The site is located outside the obstacle limitation surfaces for Glasgow Airport. It is within the instrument flight procedure safeguarding area, however only structures exceeding 300m in this area would require impact assessment. Our position in regard to this proposal will only be confirmed once the development details are finalised and we have been consulted on a full planning application, if it is required.	A49	N/A	Response noted
Glasgow Airport	I refer to your request for comments on additional information regarding the above scoping request on 11th May 2022. Our position with regards to this proposed development remains as stated in our letter to you dated 6th April 2022.	A50 & Alternative Northern Route	N/A	Response noted

action required for the EIA Report.



Consultee	Scoping Comment	Scoping Opinion Page Ref.	EIA Report Reference	Response
HIAL Safeguarding	With reference to the above, our calculations show that, at the given position and height, this development would not infringe the safeguarding criteria for Any HIAL Aerodrome. Therefore, Highlands and Islands Airports Limited has no objections to the proposal.	A51	N/A	Response noted.
Maritime and Coastguard Agency	The works undertaken as part of this consultation do not impact the marine environment and therefore no requirement for MCA to assess the risks to shipping and navigation on this occasion. We would appreciate if the applicant could confirm what is meant by <i>'measures to protect the water crossings during construction</i> (<i>scaffolding etc</i>)' and what it means in practical terms with regards to works in the marine environment, which fall under the scope of this EIA scoping report. I assume this means ensuring scaffolding remains above the mean high water level etc.	A52	N/A	There are no works in th EIA Report.
Maritime and Coastguard Agency (MCA)	Thank you for the additional information (I note the three documents published on 11th and 12th May 2022). The MCA does not believe that this additional information changes our response to the scoping consultation dated 6th of May 2022 in any way, and the MCA therefore has nothing further to add at this time.	A54 & Alternative Northern Route	N/A	Response noted.
Met Office	The nearest Met Office weather radar is approx. 45 km distant and not in any of our consultation zones. Therefore we have no objections and do not need to be consulted further.	A55	N/A	Response noted.
NATS Safeguarding	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.	A56 & Alternative Northern Route	N/A	Response noted.
NATS Safeguarding	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.	A57	N/A	Response noted.
Office for Nuclear Regulation Land Use Planning	No comment on this proposed development.	A58	N/A	Response noted.
RAF (RSP Safeguarding)	No concerns with this application.	A59	N/A	Response noted.
Royal Society for the Protection of Birds	RSPB Scotland advises that an EIA Report for this proposal should establish the potential impacts of the development on important bird populations within the area, with emphasis given to assessing potential impacts upon Annex 1/ Schedule 1 raptors (Golden eagle, Hen harrier and Barn owl) and Black grouse. The following Annex 1/ Schedule 1/ Priority Local Biodiversity Action Plan bird species have been highlighted in the scoping report as 1) occurring within or close to the Proposed Development, and 2) experiencing potential significant negative impacts: Golden eagle <i>Aquila chrysaetos</i> , Hen harrier <i>Circus cyaneus</i> , Barn owl <i>Tyto alba</i> , Black grouse <i>Lyrurus tetrix</i> . The potential impacts on these species should be adequately covered within the EIA Report. The EIA should establish how priority species use the area through vantage point observation surveys, plotting of flightlines and related information to determine any potential impacts/mitigation. It should consider present usage in comparison to the potential alteration of habitat and barrier/displacement/collision effects which may occur during and due to the Proposed Development. It should be remembered that all nesting birds are protected by law. We therefore advise that any vegetation removal/ ground disturbance required along the route of the Proposed Development should occur outwith the bird breeding season (March to August inclusive); or that these areas are checked by an appropriately skilled and experienced observer, to ensure no nesting birds are present. Regarding Golden Eagle , the Proposed Development passes through two known home ranges, with a further five breeding sites falling within a 6 km buffer. Observations during ornithological surveys corroborated the presence of at least one pair within the survey area. We advise maintaining dialogue with NatureScot and the Argyll Raptor Study Group for information about territories and regarding further	A63	Chapter 7: Ecology and Nature Conservation Chapter 8: Ornithology Chapter 10: Hydrology, Hydrogeology, Geology and Soils Chapter 14: Cumulative Assessment	Potential adverse effects considered in detail in the will be included to reduce were scoped out from de was recorded during sur Bird collision risk assesser a need for mitigation. UK Habitat Classification habitat surveys have bee assessment regarding im considered in the assess Impacts on peat have bee necessary to reduce imp subsequently minimise of Cumulative impact asses

the marine environment which fall under the scope of this ects on golden eagle, hen harrier and black grouse are being the assessment and, if appropriate, mitigation measures duce likely effects. Potential significant effects on barn owl n detailed assessment as no evidence of breeding barn owl surveys undertaken subsequent to the scoping request.

essment is being undertaken to determine whether there is

ion (UKHab) and Habitat Condition Assessment (HCA) been completed for the Proposed Development. An impact important habitats and appropriate mitigation are essment.

been considered and mitigation will be included where mpacts on peat loss and degredation, which will se carbon losses from peat.

sessment is included for ornithology as well as other topics.



Consultee	Scoping Comment	Scoping Opinion Page Ref.	EIA Report Reference	Response
	 cloud) will occur in this area, and these cannot be captured in modelling. For this reason, and because the Proposed Development would be 1. temporarily coexisting with, and 2. of a larger scale than existing infrastructure, line marking should be considered. Regarding Hen Harrier/ Barn Owl, desktop studies returned records for four breeding Hen harrier sites within 2km of the proposed route, with the closest located ca. 450m to the North of the Proposed Development. Baseline ornithology survey results also indicated that breeding activity was taking place close to the survey boundary. Desktop studies returned records for six breeding Barn owl sites within 2km of the proposed route. We advise maintaining dialogue with Argyll Raptor Study Group for information about territories and regarding your survey work. Regarding Black Grouse, in the UK, the Black grouse is a Red Listed species and the subject of a Biodiversity Action Plan. This bird has undergone significant declines in South-west Scotland, with Argyll remaining an important area for them. In the context of Argyll, a lek with 3 to 4 individuals is regionally important. Desktop studies conducted for the Proposed Development indicate local activity for this species, with records of 15 displaying males and one female returned. Our data indicate that the line of the Proposed Development (1.5 km buffer during April and May 2021) returned two leks comprised of one displaying male each. It is advised that vegetation removal/ groundworks/ construction do not take place within 1.5 km of leks during the lekking/ breeding season (March 1st - August 31st) to allow undisturbed breeding/brood rearing, and to minimise disturbance of important food plants in the field layer. 			
	Any new stock/ deer fencelines associated with the Proposed Development would also require to be marked to reduce the collision risk for this species. Habitat management/mitigation The EIAR should include a full survey, impact assessment and proposals for mitigation in relation to important habitats on this site. Mitigation should ideally avoid or seek to minimise any impact on areas of high-quality habitats found.			
	Particular attention should be given to peatland: the proposal should avoid or seek to minimise disturbance to the class 2 peat areas which the proposed route transits (SW from ca. NS171871 to NS158852). A full assessment of the carbon implications of this proposal should be undertaken, and if required, a mitigation plan prepared for any peatland affected. Attention should also be paid to rainforest habitats, which is an important UK Biodiversity Action Plan habitat, as the proposed development transits area of Atlantic Oakwood and Ancient Woodland Inventory with Plantlife Scotland's Important Plant Area. Any loss of this habitat should be minimised. If this cannot be avoided, compensatory planting should be undertaken.			
	Finally, an assessment of cumulative bird impacts in relation to other existing, consented, and proposed projects in relation to this natural heritage one and local area/eagle ranges should be undertaken.			
Royal Society for the Protection of Birds	I am writing to confirm that RSPB Scotland's original response to this scoping exercise (response issued by us as an email attachment on 12/ 04/2022) still stands, following our review of the proposed amendment to the north section of this OHL route (issued by you in email form on 11/05/2022). As has been noted in the LLTNP response, we ask that the EIA exercise captures the full scope of cumulative impacts; including any additional forestry works/ disturbance to native woodland resulting from the adoption of this proposed amendment.	A66 & Alternative Northern Route	N/A	Response noted.
ScotWays	Two Historic routes, Old Road through Strath Eachaig and Puck's Glen cross or are close to the application site. Other forms of public access to land may affect your site of interest. Under section 3 of the Land Reform (Scotland) Act 2003, there is a duty upon landowners to use and manage land in a way which respects public access rights. We suggest that the applicant may wish to approach the relevant authority's access team for their input when drawing up their Access Management Plan for their proposed development.	A67	Chapter 13: Traffic and Transport	Response noted, con team following conse
Scottish Water	Asset Impact Assessment- Acoording to our records, there is live infrastructure within proximity of the development area that may impact existing Scottish Water Assets. The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team via our customer portal for an appraisal of the proposals.	A73	Chapter 10: Hydrology, Hydrogeology, Geology and Soils	Consultation with the August 2022 and the within the Loch Eck c Further consultation detailed design stage

onsultation will be undertaken with the Access Management nsent.

the Asset and EIA Team in Scottish Water was undertaken in hey confirmed the Proposed Development does not encroach k catchment.

on on Scottish Water assests to be undertaken during the age, concurrently with consent determination.



Consultee	Scoping Comment	Scoping Opinion Page Ref.	EIA Report Reference	Response
	The applicant should be aware that any conflict with the assets idnetified will be subject to restrictions on proximity of construction. Written permission must be obtained before any works are started within the area of our apparatus.			
Scottish Forestry	The proposal to consider the potential environmental impacts and likely significant effects associated with the seven elements of sustainable forest (UKFS) within the individual topic chapters, rather than in a Forestry Chapter is acceptable. This should be prepared by a suitably qualified professional and supported by existing records, site surveys and aerial photographs. In order to present the relevant information about the forest and to secure compliance with the UK Forestry Standard, the applicant should consider the appropriate scope for each topic chapter. The effects of felling, woodland removal and re-establishment should be considered (i.e. not just woodland removal). This should also include indirect impacts on adjacent woodlands. This can, as suggested in the Scoping Report, be achieved by describing effects in the relevant Environment Receptor chapters, however, they should be clearly cross referenced from the proposed Chapter 10 Forestry and effects should be summarised in a Technical Appendix. The Scoping Report proposes the development of Woodland Assessment reports on effected woodland blocks to be submitted as appendices to the EIA report. We recommend that these are consistent with the report content developed for the Inveraray Crossaig upgrade. The Woodland Reports should identify all areas of felling required to form the operational corridor and access corridors. In addition, the Woodland Reports should aim to reduce the risk of future wind throw by identifying felling o stable forest edges (outside of the operational corridor). The topic chapters should describe the baseline conditions of the forest as well as the social, economic and environmental values of the forest. The applicant should also consider the potential cumulative impact of existing and proposed developments on the forest resource.	A79	Chapter 12: Forestry	The Woodland Assessme the report content devel The forestry impact of the the UKFS guidance and c the woodland baseline co removal areas including in proposals. Forestry Project Felling N showing the required an The EIA Forestry chapter cumulative effects of the Other assessments and r Plan and Forest Landscap woodland areas e.g. woo The commitment to achi Compensatory Planting N
Scottish Forestry	 The new alignment would have an increased impact on woodland. Areas of concern for Scottish Forestry regarding the new proposed route would be: The potential impact on future forestry management activity from the forest road. Operational isolation of woodland above the OHL. The proposal will also impact on Plantations on Ancient Woodland Sites (PAWS) and Ancient Woodland sites and comments in our scoping response of April 2022 still apply. The forestry chapter should also include information on the presence of Larch and <i>Phytophthora ramorum</i> within and adjacent to the operational corridor, and the potential impact on control and spread of the disease. There will be impacts from the increased level of forestry activity creating the corridor and linear aspect of the work. 	A83 & Alternative Northern Route	Chapter 12: Forestry	Congnisance of these im OHL alignment selection The impact assessment, in the suite of forestry d
Transport Scotland	Transport Scotland is satisfied with the proposed study area, but would add that a Traffic Data Count site north of Ardgarten visitor centre may be utilised to supplement base traffic data. Traffic data will require to be factored into the construction year flows, using National Road Traffic Forecasts (NRTF) Low Growth. Additionally, there is also no mention of any requirement for the use of abnormal load deliveries. Given the nature of the development it is assumed that these wouldn't be required. However, should there be a need for such loads Transport Scotland will need to be satisfied that the loads can negotiate the selected route and would not effect structures along the route.	A84	Chapter 13: Traffic and Transport	Response noted. No abr change however, it woul other relevant stakehold routes.
Transport Scotland	The additional information provided does not alter the contents of our previous consultation and that response remains valid.	A86 & Alternative Northern Route	Chapter 13: Traffic and Transport	Response noted.

ment reports structure and content will be consistent with eveloped for the Inveraray Crossaig upgrade project.

f the Proposed Development will be assessed in-line with d compiled in the form of OHL Woodland Reports detailing e conditions/characteristics and the required woodland ng the assessment and identification of suitable mitigation

ng Maps will be produced for the Proposed Development, and proposed woodland removal areas.

ter will detail the forestry assessment methodology and the required woodland removal areas.

nd reports will include a Native Woodland Management scape Concept Design Plan specific to the relevant

voodland removal areas prominent in the forest landscape.

chieve 'no net loss' of woodland will be detailed in a ng Management Strategy for the Proposed Development.

impacts have been acknowledged and applied during the ion stage with ongoing liaison with landowners.

nt, management and mitigation proposals will be detailed y documents as listed above.

abnormal loads are anticipated to be required. Should this ould be proposed to liaise with Transport Scotland and any olders to confirm the suitability of the proposed access



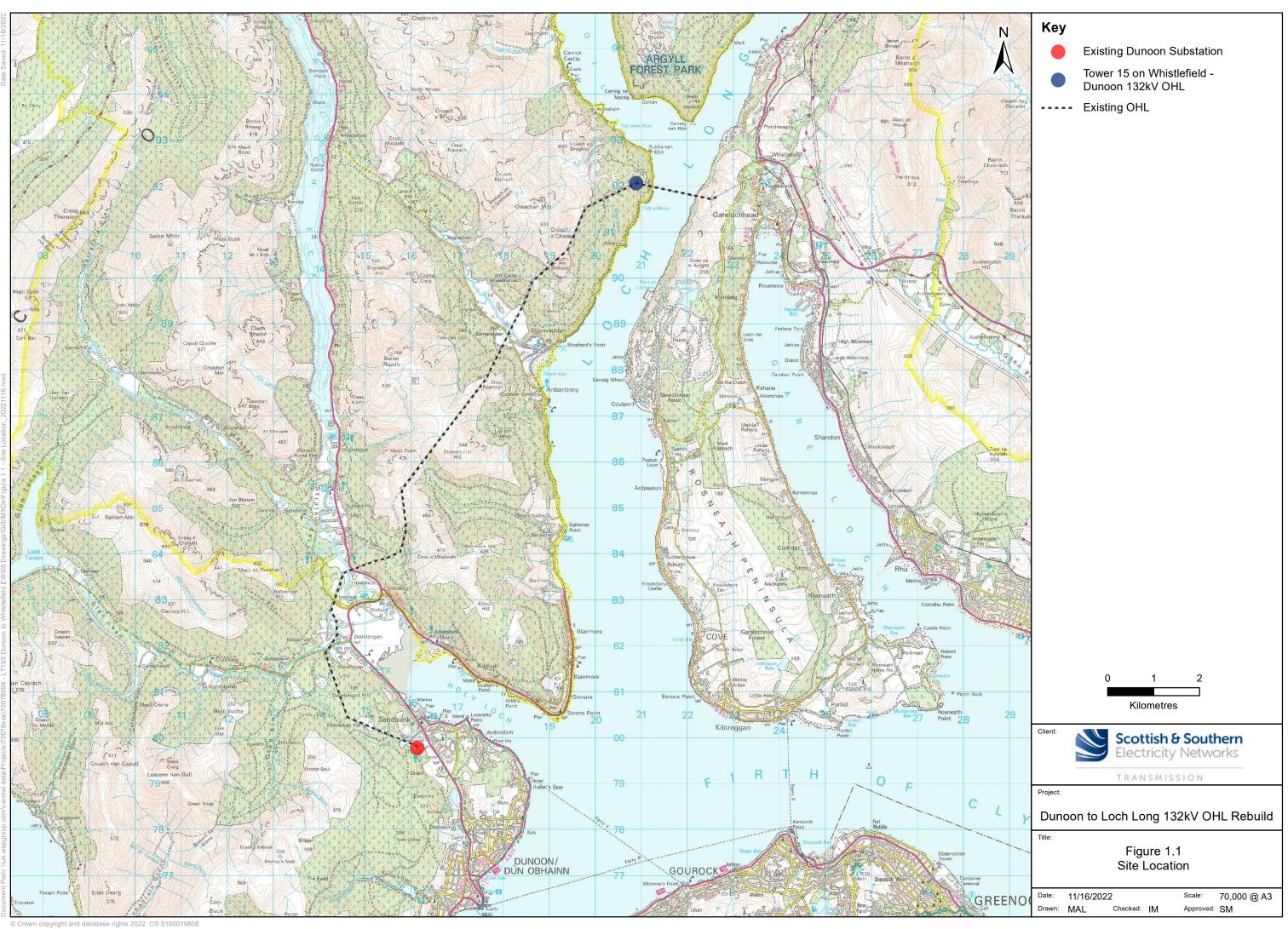
Consultee	Scoping Comment	Scoping Opinion Page Ref.	EIA Report Reference	Response
Marine Scotland	The detail within the generic scoping guidelines already provides sufficient information relating to water quality and salmon and trout populations for developers at this stage of the application. Developers will be required to provide a completed gate check checklist in advance of their application submission which should signpost ECU to where all matters relevant to freshwater and diadromous fish and fisheries have been presented in the EIA report. Where matters have not been addressed or a different approach, to that specified in the advice, has been adopted the developer will be required to set out why. Developers should specifically discuss and assess potential impacts and appropriate mitigation measures associated with the following: any designated area, for which fish is a qualifying feature, within and/or downstream of the proposed development area; the presence of a large density of watercourses; the presence of large areas of deep peat deposits; known acidification problems and/or other existing pressures on fish populations in the area; and proposed felling operations. It is recommended that regular visual inspections are carried out by the appointed Ecological Clerk of Works (ECoW) on all watercourses paying particular attention to watercourses during and after periods of prolonged precipitation, during the fish migration/ spawning period and on watercourses which are downstream of watercourse crossings, where construction is carried out and where vehicular traffic is frequenting.	A90	Chapter 7: Ecology and Nature Conservation and Chapter 10: Hydrology, Hydrogeology, Geology and Soils	Marine Scotland Checkli Chapter 10 considers wa Water Environment (Con amended), both in term crossings, which mitigat proposed felling operati Water quality and fresh Chapter 7 Ecology and N justification. Any perma northern portions of the that have limited salmon crossing points are chara connectivity/ substrate l areas of localised habita continuity of available h the above factors. In ad effects on watercourses Environmental Managar
Ironside Farrar	The Scoping Request (6.2.11) notes Classes 1 and 2 peat are present in higher altitudes based on Nature Scot mapping with the majority of the route located within Class 0 mineral soils (not peat). This does not fully tie in with our own review of the 2016 Peatland mapping, which is that sections of the northern part of the route cross Class 2 and 5 peat in the higher areas as well as a small section of Class 3 peats. The route passes through or in close proximity to Class 5 peat in the south of the proposed development, adjacent to the A885 northwest of Dunoon. The Nature Scot mapping notes that Class 5 soils includes carbon soils with deep peat, Class 2 soils are defined as supporting nationally important carbon-rich soils, deep peat and priority peatland habitat and Class 3 soils are predominantly peaty soils with some heath vegetation. Mineral soils (no peat) are shown elsewhere along the route. Our review of British Geological Society mapping does not identify peat along the route on the superficial soils mapping. Given our review and that OS mapping confirms that slopes of greater than 2 degrees are present along the line of the development, guidance within the Energy Consents Units Best Practice Guide 2017 confirms, based on these factors, that a Peat Landslide Hazard Risk Assessment for the works will be required. The Scoping Request in our opinion does not provide sufficient information to scope out a formal PLHRA at this stage. We agree that it does appear that peat is not present over much of the route and that therefore a targeted assessment would be appropriate. If a detailed walkover and preliminary probing were to conclude that there is no peat present along any of the proposed development or within influencing distance up/ downslope, the PLHRA could be a very simple document.	A93	Chapter 10: Hydrology, Hydrogeology, Geology and Soils	Noted. A PLHRA will be submitt
JRC Windfarms	JRC has no comment to make on this application at this time.	N/A	N/A	Response noted.

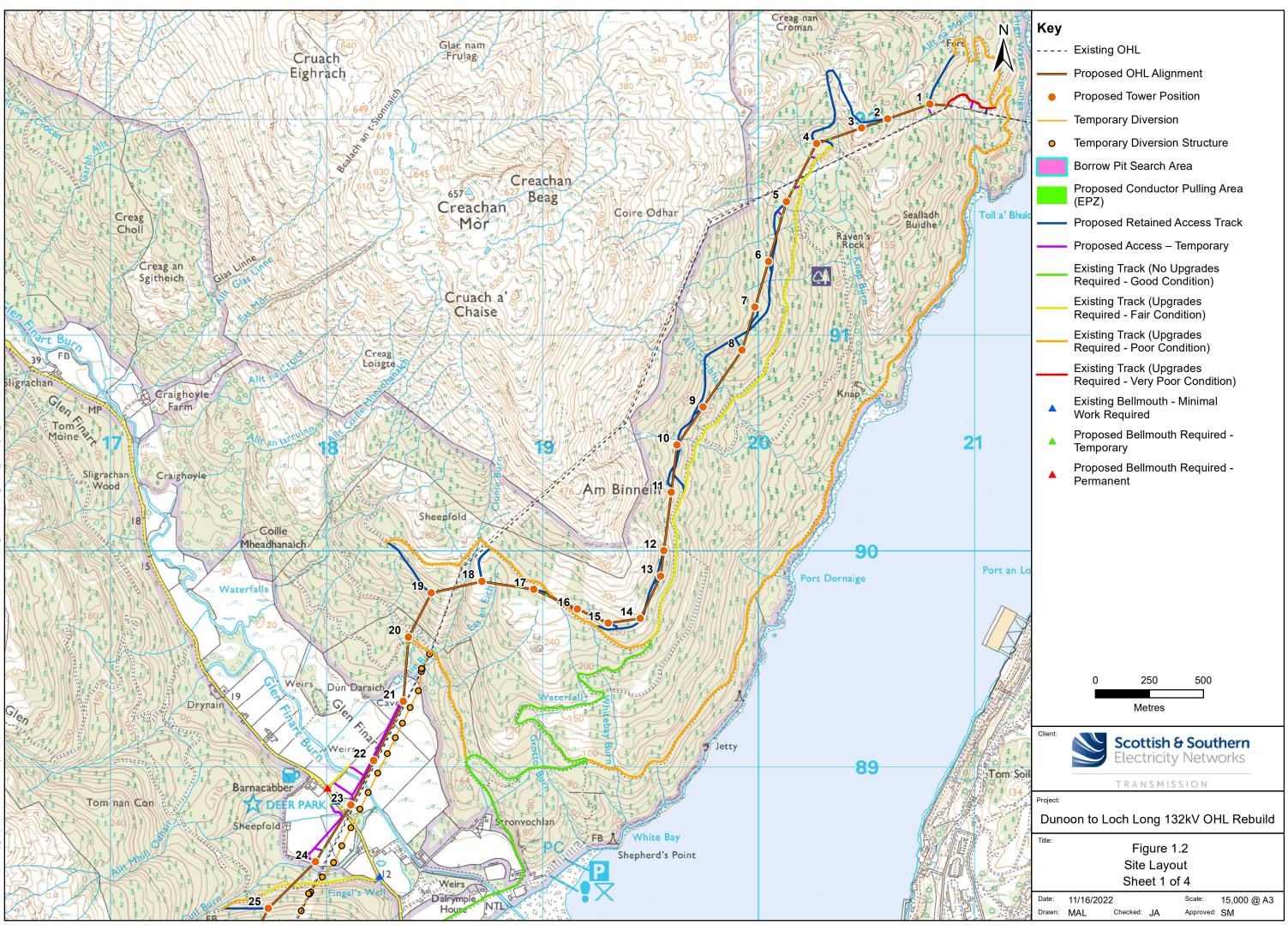
klist to be provided.

watercourse crossings in terms of best practice and the Controlled. Activities) (Scotland) Regulations 2011 (as rms of permanent culvert design and temporary clear-span gating direct impacts to watercourses. The effects of the ations within the Site are also considered.

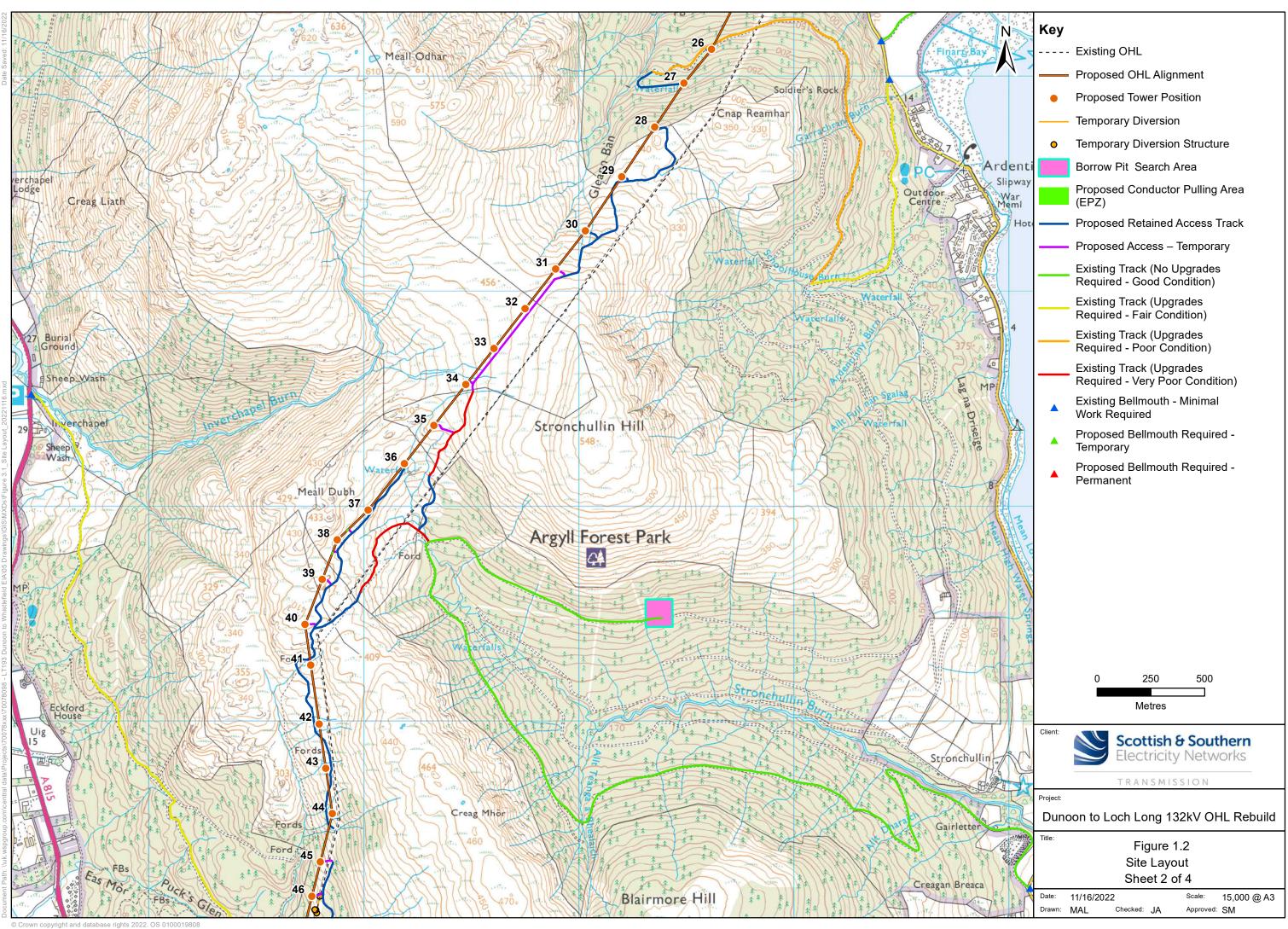
shwater fish are scoped out from further assessment in d Nature Conservation with the following further manant new watercourse crossings are located in the the Proposed Development at small upland headwaters nonid or overall fish habitat. The extents of these at the aracterised by overgrown bankside vegetation, poor te heterogeneity and a lack of channel structure. Small itat suitability were observed within the Site, however, the e habitat as well as accessibility for fish is restricted due to addition, embedded mitigation to avoid potential negative ses are included within the Applicant's General gament Plan documents.

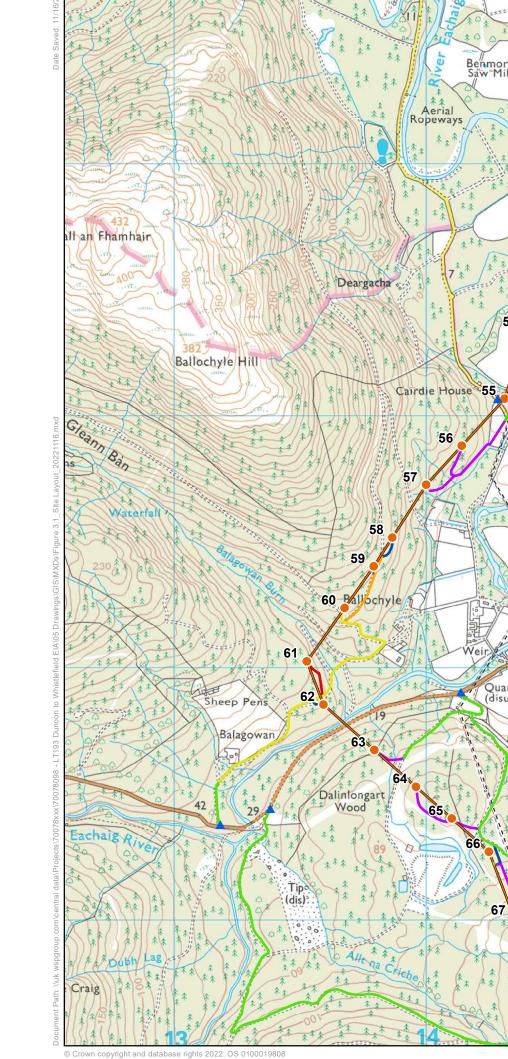
itted as part of the EIA Report.

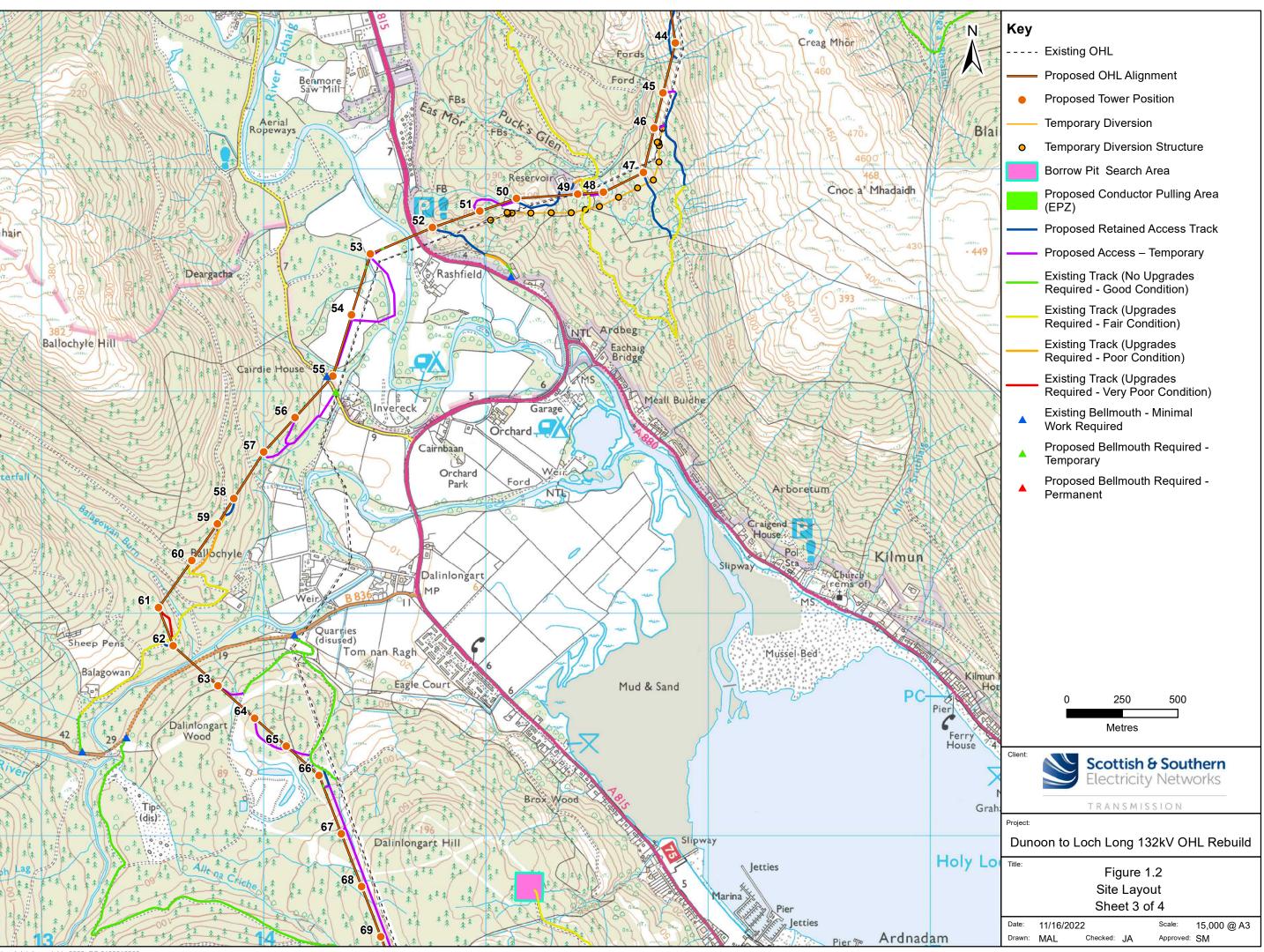


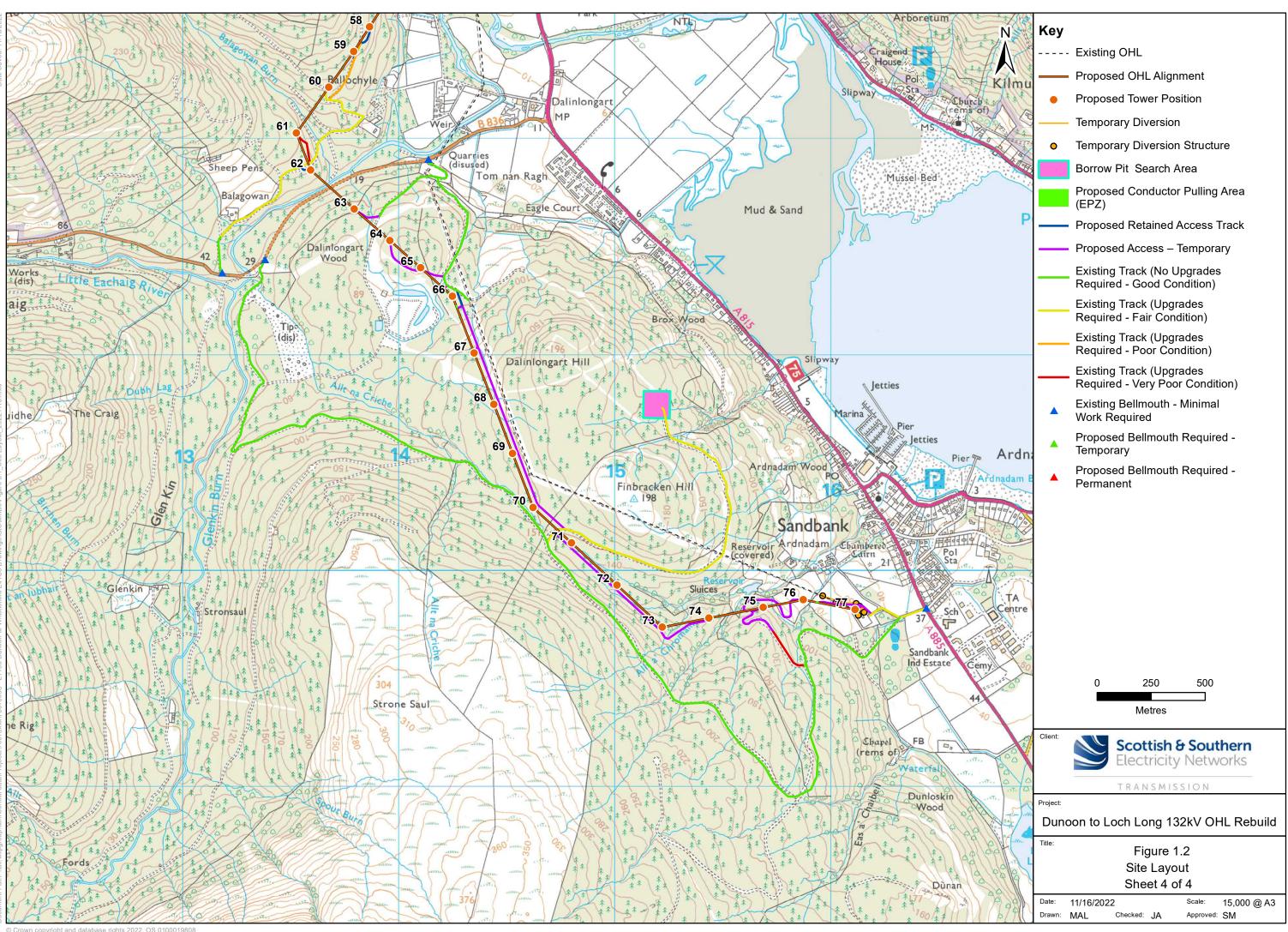


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