

Report on Consultation (Route Options)

Achany Wind Farm Extension Grid

Connection

April 2023

REF: LT361/362



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Figure 1: Proposed Route

GLOSSARY

Term	Definition
Alignment	A centre line of an overhead line OHL, along with location of key angle structures.
Alignment (preferred)	An alignment for the overhead line taken forward to stakeholder consultation following a comparative appraisal of alignment options.
Alignment (proposed)	An alignment taken forward to consent application. It comprises a defined centre line for the overhead line and includes an indicative support structure (tower or pole) schedule, also specifying access arrangements and any associated construction facilities.
Amenity	The natural environment, cultural heritage, landscape and visual quality. Also includes the impact of SSEN Transmission's works on communities, such as the effects of noise and disturbance from construction activities.
Ancient Woodland Inventory (AWI)	The Ancient Woodland Inventory (AWI) is a provisional guide to the location of Ancient Woodland. It contains three main categories of woodland, all of which are likely to be of value for their biodiversity and cultural value by virtue of their antiquity: Ancient Woodland (1a and 2a); Long-established woodlands of plantation origin (LEPO) (1b and 2b); and other woodlands on 'Roy' woodland sites (3).
Biodiversity Net Gain (BNG)	A process intended to leave nature in a better state than it started using good practice principles established by the Business and Biodiversity Offset Programme (BBOP) and organisations including CIRIA, CIEEM and IEMA.
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.
EA	When a Proposed Development is unlikely to give rise to significant environmental effects and is not considered an EIA development it would not be subject to an EIA and the preparation of an EIA Report. In this circumstance, an optional Environmental Appraisal (EA) detailing the results of surveys, and any appropriate mitigation, can accompany a consent application.
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 effects of a proposed project or development.
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(s).

Term	Definition
Micrositing	The process of positioning infrastructure 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 steel lattice towers or wood poles.
Plantation Woodland	Woodland of any age that obviously originated from planting.
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.
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.
Sites of Special Scientific Interest (SSSI)	Areas of national importance. The aim of the SSSI network is to maintain an adequate representation of all natural and semi-natural habitats and native species across Britain.
Span	The section of overhead line between two structures.
Special Area of Conservation (SAC)	An area designated under the EC Habitats Directive to ensure that rare, endangered or vulnerable habitats or species of community interest are either maintained at or restored to a favourable conservation status.
Special Landscape Area (SLA)	Landscapes designated by the Highland Council which are considered to be of regional/local importance for their scenic qualities.
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.
The National Grid	The electricity transmission network in the Great Britain.
Underground Cable (UGC)	An electric cable installed below ground, protected by insulating layers and marked closer to the surface to prevent accidental damage through later earthworks.
Volts	The international unit of electric potential and electromotive force.
Wayleave	A voluntary agreement entered 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 ASH Design and Assessment 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 responses received from key stakeholders (including statutory and non-statutory consultees, local communities, landowners and individual residents) during consultation between October 2022 and January 2023 in response to the preferred route identified for the proposed Achany Wind Farm Extension Grid Connection, as set out in the Consultation Document¹.

Landowners were made aware of the Consultation Document, and a Consultation Booklet was made available online at the project website from 15 of November 2022:

- <https://www.ssen-transmission.co.uk/projects/project-map/achany-wind-farm-extension-connection>

In-person consultation events were undertaken to seek the views of the local community. Consultation events were held at the following time:

- 22nd November 2022: 15:00 to 19:30 at Lairg Community Centre

This Report on Consultation also provides a summary of how SSEN Transmission have responded to comments received by key stakeholders on the preferred route and details the actions that will be taken as the project progresses through to Stage 3 (Alignment Selection).

¹ SSEN Transmission (October 2022). Achany Wind Farm Extension Grid Connection - Consultation Document (Route Options)

EXECUTIVE SUMMARY

Scottish Hydro Electric Transmission plc ("the Applicant") who, operating and known as Scottish and Southern Electricity Networks Transmission ("SSEN Transmission"), own, operate, and develop the high voltage electricity transmission system in the north of Scotland and remote islands.

An application for consent under Section 36 of the Electricity Act 1989 was submitted by SSE Generation Limited in July 2021 to construct and operate an extension to the operational Achany Wind Farm. A decision on this application from Scottish Ministers is currently awaited.

Should the proposed Achany Wind Farm Extension be granted consent, it would be constructed on land adjacent to the operational Achany Wind Farm, approximately 4.5 km north of the village of Rosehall and 11 km north-west of Lairg. It is anticipated to generate in excess of 80 Megawatts (MW) and to comprise of 18 turbines which require connection to the electricity transmission network at Shin substation by 31 October 2026. It is proposed that this would be achieved via the construction and operation of a new 132 kV single circuit overhead line (OHL). In accordance with the Applicant's statutory duties, SSEN Transmission are developing the connection arrangement for the Achany Wind Farm Extension. A section 37 application under the Electricity Act 1989 is anticipated to be submitted in December 2023.

This Report on Consultation documents the consultation process which has been undertaken for the project during the route options stage between October 2022 and January 2023. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the preferred route.

This report describes the key responses received and provides detail on the actions proposed in response to the issues raised. The consultation process has confirmed that the preferred route as described within the Consultation Document¹ above **Route Option 1**, should be taken forward as the proposed route to the alignment selection stage of this project, on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors..

1. INTRODUCTION

1.1 Background and Purpose of Document

- 1.1.1 This Report on Consultation has been prepared by ASH design+assessment Limited ("ASH") on behalf of Scottish Hydro Electric Transmission plc ("the Applicant") who, operating and known as Scottish and Southern Electricity Networks Transmission ("SSEN Transmission"), own, operate, and develop the high voltage electricity transmission system in the north of Scotland and remote islands. In this report, the Applicant and SSEN Transmission are used interchangeably unless the context requires otherwise.
- 1.1.2 In accordance with the Applicant's statutory duties under the Electricity Act 1989, SSEN Transmission is proposing to construct a new 132 kV overhead line (OHL) between the proposed Achany Wind Farm Extension on-site substation and the existing Shin substation to connect the proposed wind farm to the national grid. The project is known as the Achany Wind Farm Extension Connection. A section 37 application under the Electricity Act 1989 is anticipated to be submitted in December 2023.
- 1.1.3 The project would comprise a new 132 kV single circuit OHL supported on a trident H-wood pole. There could be a requirement to install a short section of underground cable (UGC), of approximately 500 m from the proposed Achany Wind Farm Extension substation, due to the location of wind turbines and the need to avoid OHL infrastructure within their vicinity. In addition, there is also the potential for a short section of UGC near Shin substation to facilitate the connection into the substation. This is discussed further in Section 2.2 and 2.3.
- 1.1.4 This Report on Consultation documents the consultation process for the project between October 2022 and January 2023, during the route option 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 route², prior to identifying the proposed route to be taken forward to the alignment selection stage of the project.
- 1.1.5 The report describes the key responses received and details the actions taken in response to the issues raised.

1.2 Objectives

- 1.2.1 The objectives of this report are:
- To document the consultation process between October 2022 and January 2023;
 - To summarise feedback received from stakeholders;
 - To document actions undertaken in response to feedback where relevant; and
 - To clearly set out how the proposed route has been informed by the consultation process.

1.3 Document Structure

- 1.3.1 This Report on Consultation is structured as follows:

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

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

Section 3: Consideration of Route Options – describes how the preferred route was identified;

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

² Identified within the Achany Wind Farm Extension Grid Connection Consultation Document (October 2022), produced by SSEN Transmission

Section 5: Consultation Responses from Statutory and Non-Statutory Consultees - summarises the responses from these bodies;

Section 6: Community Consultation Responses– summarises the responses from the local community;

Section 7: Project Responses to Consultation – describes how the comments and issues raised during consultation will be addressed; and

Section 8: Conclusions and Next Steps – provides a summary of the conclusions reached, including identification of the proposed route, and actions going forward.

2. PROJECT OVERVIEW

2.1 Preferred Technology Solution

2.1.1 It is proposed that the connection would be an OHL supported by trident H-wood pole. Short sections of UGC may be required at either end of the connection, as described in paragraph 1.1.3, to facilitate connections into the substations in light of technical and engineering constraints. This will be determined based on engineering assessments as the project progresses.

2.2 Proposal Overview

General Construction Activities

2.2.1 To facilitate the connection, the main construction elements associated with the development are anticipated to include:

- establishment of one or more construction compounds;
- establishment of suitable laydown areas for materials;
- construction of temporary stone tracks and other temporary access solutions as necessary;
- delivery of structures and materials to site;
- excavation and construction works associated with foundations, as necessary;
- assembly and erection of wood poles;
- stringing of conductors using hauling ropes and winches; and
- inspections and commissioning.

2.2.2 The trident wood poles would have a nominal height of approximately 16 m (including insulators and support). The proposed trident wood pole would support three conductors (wires) in a horizontal flat formation. The spacing between poles would vary depending on topography and altitude. The specific distances would be determined after a detailed line survey but would be approximately 100 m apart. A photograph showing a typical wood pole trident line is shown in Plate 2.1.

Plate 2.1: Example Trident H-wood poles



Underground Cable

2.2.3 For the short sections of UGC described above, installation would involve the following tasks:

- establish a working corridor approximately 30 m wide, centred on the UGC;
- excavate a trench up to 2 m in depth and 1 m wide, widening through benching and battering where stability and safety concerns arise;

- clear out all materials likely to damage cable ducts, e.g. clods, rocks, stones and organic debris, and employ use of pumps to remove any water;
- place cabling within the trench, surrounded by engineered backfill in suitable layers for protection, with marker boards placed above the cable line; and
- reinstate excavated surface layers in reverse order.

Forestry Removal

- 2.2.4 Construction of the project may require the removal of sections of commercial forest, depending on the proposed alignment. This would be undertaken in consultation with affected landowners. Scottish Forestry would also be consulted throughout the development of the project and the project would adhere to Scottish Government's Control of Woodland Removal Policy.³
- 2.2.5 After felling, any timber removed that is commercially viable would likely be sold and the remaining forest material would be dealt with in a way that delivers the best practicable environmental outcome and is compliant with waste regulations.
- 2.2.6 An operational corridor would be required to enable the safe operation and maintenance of the OHL. This would vary depending on the type of woodland (based on species present) in proximity to the OHL, and the height of support structures used within each woodland area.

Access Strategy

- 2.2.7 Vehicle access is required to each pole location during construction to allow excavation and creation of foundations and pole installation. Existing tracks would be used where possible. Preference will be given to lower impact access solutions including the use of low pressure tracked personnel vehicles and temporary track solutions in boggy / soft ground areas to reduce any damage to, and compaction of, the ground. These journeys would be kept to a minimum to minimise disruption to habitats along the route. However, temporary stone tracks may be necessary in some areas depending on existing access conditions, terrain, and altitude.

Programme

- 2.2.8 It is anticipated that construction of the project would take place over a 16-month period, following the granting of consents, although detailed programming of the works would be the responsibility of the Contractor in agreement with SSEN Transmission.

³ Forestry Commission Scotland (2009) Control of Woodland Removal Policy

3. CONSIDERATION OF ROUTE OPTIONS

3.1 Introduction

3.1.1 The Consultation Document⁴ sets out the approach to the consideration and appraisal of route options, in line with SSEN Transmission’s guidance ‘Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above.’⁵ The guidance sets out SSEN Transmission’s approach to selecting a route for an OHL or UGC. This document helps SSEN Transmission to meet its obligations under Schedule 9 of the Electricity Act 1989, which requires transmission license holders:

- to have a regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interests; and
- to do what they reasonably can to mitigate any effect that the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

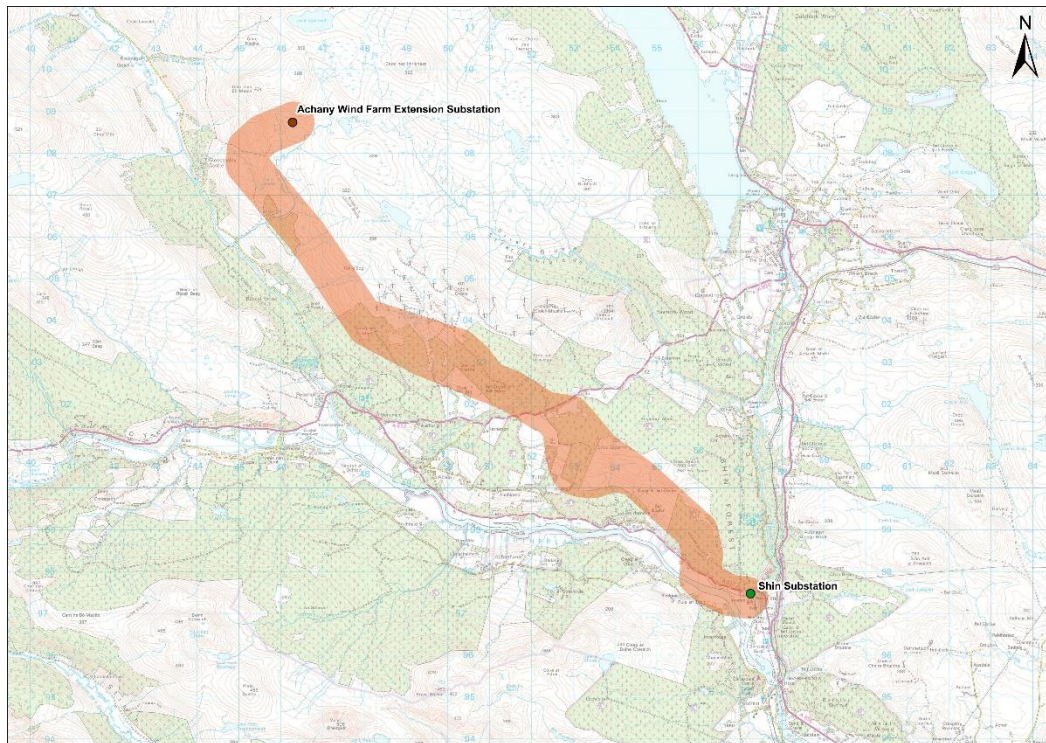
3.1.2 In line with the principles outlined in the guidance document, the method of identifying a preferred route has involved the following 4 key tasks:

- Identification of the baseline situation;
- Identification of route options;
- Environmental and engineering analysis of route options; and
- Identification of a preferred route.

3.2 Identification of Preferred Route

3.2.1 The preferred route was selected on the basis that it is considered to provide an optimum balance of environmental, technical, and economic factors. The preferred route presented within the Consultation Document¹ is shown in Plate 3.1.

Plate 3.1: Preferred Route



⁴ SSEN Transmission (October 2022) Achany Wind Farm Extension Grid Connection - Consultation Document (Route Options)

⁵ SSEN Transmission (September 2020), Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above

4. THE CONSULTATION PROCESS

4.1 Overview

4.1.1 In accordance with SSEN Transmission's guidance,⁶ a process of consultation on the preferred route has been undertaken.

4.2 Methods for Consultation

4.2.1 The following methods were used to consult on the preferred route, as set out below.

Consultation Document

4.2.2 The Achany Wind Farm Extension Grid Connection Consultation Document (October 2022) was produced detailing the selection process for the preferred route, taking account of environmental, economic and technical factors. Landowners were made aware of the Consultation Document, and a Consultation Booklet was made available online at the project website.

4.2.3 Table 4.1 details the stakeholders in receipt of the Consultation Document or Consultation Booklet or otherwise informed of the website or public consultation events details:

Table 4.1: List of Stakeholders

Stakeholders	
Statutory Consultees	
Historic Environment Scotland (HES)	NatureScot
Scottish Environment Protection Agency (SEPA)	The Highland Council (THC)
Non-Statutory Consultees	
Ardgay and District Community Council	Creich Community Council
Forestry and Land Scotland (FLS)	Highfield Forestry Limited (HFL)
Lairg Community Council	Linside Common Grazing committee
Rogart Community Council	THC Ward 02 Thurso and Northwest Caithness
THC Ward 04 Easter Sutherland and Edderton	

4.2.4 Landowners were made aware of the Consultation Document and local community councils and ward councillors were notified regarding the consultation events.

4.2.5 Feedback on the Consultation Document was requested by **20th December 2022**.

4.2.6 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 need for the project been clearly explained?
 - Have we explained the approach taken to select the preferred route adequately?
 - Are there any factors, or environmental features, that you consider may have been overlooked during the preferred route selection process?
 - Do you feel, on balance, that the preferred route selected is the most appropriate for further consideration at the alignment selection stage?
- A feedback form was also provided on the project webpage allowing users to submit comments.

⁶ SSEN Transmission (September 2020), Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above

Public Consultation Events

- 4.2.7 An in-person consultation event took place for this project at the following time:
- 22nd November 2022: 15:00 to 19:30 at Lairg Community Centre
- 4.2.8 Consultation events were advertised in the local press, SSEN Transmission's social media channels and the dedicated project website. A mail drop of a booklet and letter informing of the event was also carried out to 1393 households along the route options ahead of the virtual consultation.
- 4.2.9 A total of 13 people attended the public consultation event on the 22nd of November 2022. One feedback form was received by post. No online feedback forms were received after the virtual consultation.

5. CONSULTATION RESPONSES FROM STATUTORY AND NON-STATUTORY CONSULTEES

5.1 Introduction

Table 5.1 sets out a summary of the feedback received by statutory and non-statutory consultees following the consultation period (October to January 2023). A response to the feedback is also provided by SSEN Transmission, together with confirmation of the action to be taken, where relevant.

Table 5.1: Statutory and Non-Statutory Consultee Feedback

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Statutory		
Historic Environment Scotland (HES)	<p>In response to SSEN Transmission's specific questions relating to the consultation document, HES considered that the Consultation Document clearly and adequately set out the need for the project. HES were content that the approach taken to select the preferred route for the OHL was adequately explained. HES have not identified any assets within their specific remit that have been overlooked.</p>	This has been noted.
	<p>HES comments identified the assets within their remit which appear most likely to receive impacts from the Proposed Development, however, their list is not exhaustive and they advise that it will be important that a detailed and thorough assessment of potential impacts is carried out by experienced heritage professionals.</p>	Potential impacts on historic monuments will continue to be reviewed as the project progresses through the alignment selection stage of the project.
	<p>HES also reiterated that it is important to seek advice from the local authority archaeology and conservation advisors regarding the potential impacts from the development on historic environment assets out with their remit.</p>	This has been noted. The local authority will be consulted.
	<p>HES are content from the information presented at this stage that the proposed OHL is unlikely to have significant adverse impacts on the setting of designated historic environment assets within their remit.</p>	This has been noted.
	<p>HES stated that none of the three routes proposed are likely to raise significant concerns for their remit. There are no designated heritage assets located within the route options, however, HES indicated that there is a cluster of monuments located at the south-east end of the route corridor at Invershin, including:</p> <ul style="list-style-type: none"> • Achinduich, hut circle 900m S of (SM1825) • Invershin Primary School, settlement 760m NE of and 750m ENE of (SM5462) • Invershin Primary School, settlement 600m E of (SM5498) • Invershin Farm, standing stone 220m ENE of (SM1791) • Invershin Farm, settlement and burnt mound 500m E of (SM5497) 	This has been noted. Potential setting impacts on historic monuments will continue to be reviewed as the project progresses through the alignment selection stage of the project.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>HES pointed out that Invershin Farm, standing stone 220m ENE of (SM1791) is located on the valley floor and has a setting that likely references routeways through the landscape as well as the confluence of the River Shin with the River Oykle and views up and down the Kyle of Sutherland.</p> <p>HES note that the baseline setting of these monuments already includes a number of overhead lines approaching the existing Shin substation, as well as a major A road and a railway, and the proposed OHL would be on the far side of this existing infrastructure when viewed from the monuments.</p>	
	<p>HES noted that there are also a number of monuments clustered within Achany Glen and around Lairg to the north-east of the route corridor. They noted that whilst most have localised settings, exceptions include:</p> <ul style="list-style-type: none"> • Druim Baile Fuir, stone circle, cairns, hut circles and enclosure (SM1784) • Achany, chambered cairn 250m NE of (SM1759) • The Ord, chambered cairns, cairns, settlements and field systems (SM 1812) <p>HES is of the opinion that given the distance between these monuments and the proposed OHL, and the maximum height of the OHL at 16m , it is considered unlikely that significant adverse impacts on the settings of these assets will occur.</p>	<p>This has been noted. Potential setting impacts on historic monuments will continue to be reviewed as the project progresses through the alignment selection stage of the project.</p>
	<p>HES agreed with the Consultation Document, in that, Route Option 1 and Route Option 1a could potentially have an impact on the setting of Invershin Farm, standing stone 220m ENE of (SM1791), with a greater impact caused by Route Option 1a as it would cross the Kyle of Sutherland in views upstream of the monument.</p>	<p>This has been noted. Route Option 1 was identified as the preferred route in the Consultation Document.²</p>
	<p>HES agreed with the Consultation Document, in that in relation to Route Option 2, small sections of the proposed OHL could be visible from Druim Baile Fuir, stone circle, cairns, hut circles and enclosure (SM 1784), but that this would be backdropped by the consented Braemore Wood wind farm, and therefore the change to the baseline setting would only be very slight.</p>	<p>This has been noted. Route Option 1 was identified as the preferred route in the Consultation Document.²</p>
	<p>HES recommends that as the development progresses and further consultation is undertaken, a visualisation is provided showing Invershin Farm, standing stone 220m ENE of (SM1791) in its setting looking north-west towards the existing Shin</p>	<p>This has been noted. A visualisation will be prepared and included with the section 37 application. to demonstrate the visual impact from Invershin Farm, standing stone 220m ENE of (SM1791).</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	substation and the proposed OHL. This would enable a full assessment of the impact of the proposed OHL on the setting of the monument.	
NatureScot	NatureScot welcomed the opportunity to comment on this proposal at an early stage and the level of detail provided in the supporting consultation document. In summary, they agreed the Route Option 1 avoids crossing protected sites.	This has been noted.
	<p>NatureScot noted that the route options lie close to Caithness and Sutherland Peatlands Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site, protected for its range of upland habitats, species (including marsh saxifrage and otter) and breeding birds.</p> <p>They highlighted that all three route options lie within connectivity distance for SPA bird species and SAC otter. In addition, where the route options run close to the SAC boundary, they have the potential to affect adjacent SAC habitats.</p>	This has been noted. These nature conservation sites of international importance have been considered during the appraisal of route options, and will continue to be considered as the project progresses.
	<p>Furthermore, NatureScot made the point that should Route Option 2 be considered further, the line will cross into this SAC for a short distance.</p> <p>Avoiding impacts to this site should be a key consideration in the design and routing of a proposal in this area. Where impacts are identified, careful and thorough assessment will be required to demonstrate that a proposal can be built in this location without adverse effects on the qualifying interests of the site.</p>	This has been noted. Route Option 2 is not the preferred route option.
	In relation to SPA birds, survey work should follow the NatureScot guidance on power lines and survey methods for onshore wind farms.	<p>This has been noted. NatureScot guidance on power lines and survey methods for onshore wind farms will be consulted.</p> <p>NatureScot also provided further advice to on the scope of bird survey work in their e-mail of 22 November 2022.</p> <p>In October 2023, NatureScot was contacted via email with an ornithology scope document. This was a document outlining the intended bird survey methodology for the project including proposed methodology for Vantage Point Surveys and Other Bird</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
		<p>Surveys including breeding raptor surveys, and other upland breeding bird surveys.</p> <p>Following further correspondence with NatureScot, and clarification on some matters, NatureScot confirmed they were content with the proposed scope of ornithology surveys for the project.</p>
	<p>In relation to the SAC and otter, NatureScot outlined that further advice on survey and assessment is available on the NatureScot standing advice page.</p> <p>Where otter activity is identified, connectivity with the SAC should be fully considered as part of any future application.</p>	<p>This is noted. Further protected species surveys, in accordance with NatureScot guidance, will be undertaken as the project progresses.</p>
	<p>NatureScot suggests references to existing environmental information for nearby wind farms will also be useful when considering survey requirements for a proposal in this area.</p>	<p>This has been noted. Existing environmental information for nearby wind farms will also be consulted and used to inform an understanding of the baseline environment, where relevant.</p>
	<p>NatureScot point out that all route options will lie within the catchment of the River Oykel SAC, protected for its Atlantic salmon and freshwater pearl mussels. The potential for direct and indirect impacts to the SAC will therefore need to be considered further as part of any future planning application.</p> <p>Given the proximity of the route options and the SAC, pollution prevention and siltation measures will be very important to maintain good water quality and safeguard the SAC features. Any mitigation measures proposed should be fully detailed in any future application. NatureScot also recommend consulting SEPA in relation to impacts on the water environment.</p>	<p>This is noted, and further consideration of potential impacts to the qualifying features of the River Oykel SAC will be undertaken as the project progresses. This will include consideration of appropriate pollution prevention and silt control measures, and other mitigation measures where required.</p>
	<p>NatureScot pointed out that all 3 route options lie close to the Grudie Peatlands (SSSI), with Route Option 2 crossing into the site for a short section. The SSSI is protected for its blanket bog and breeding peatland waders (dunlin, golden plover and greenshank). It also forms part of the larger Caithness and Sutherland Peatlands SAC/SPA/Ramsar site, and their advice given for this site will also be relevant for the SSSI.</p>	<p>This has been noted. Route Option 2 is not the preferred route option. Further consideration of potential impacts to the Grudie Peatlands SSSI will occur as the project progresses, as necessary.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>NatureScot outlined that the Kyle of Sutherland Marshes SSSI is protected for its wet woodland, flood-plain fen and flowering plants. Both Route Option 1 and Route Option 2 avoid this SSSI. However, Route 1a will cross the SSSI in 2 places.</p>	<p>This has been noted. Route Option 1a is not the preferred route option.</p>
	<p>NatureScot mentioned that Route Option 1a will require felling of wet woodland to accommodate the overhead line wayleave. Based on the information provided, NatureScot advise it would be challenging to connect the line through the SSSI without it resulting in adverse effects on the natural features of the site.</p> <p>Route Option 1a would result in direct impacts and permanent loss of SSSI woodland.</p> <p>In addition, Route Option 1a would have the potential to impact the flood-plain fen and flowering plant features of the SSSI.</p>	<p>This has been noted. Route Option 1a is not the preferred route option.</p>
	<p>NatureScot confirmed that as per the Consultation Document, all three route options would pass through Class 2 and potentially some Class 1 areas of peatland. Class 1 and Class 2 areas are described as nationally important carbon-rich soils, deep peat and priority peatland habitat likely to be of high conservation value and restoration potential. These areas are afforded significant protection under Scottish Planning Policy.</p> <p>All route options therefore could have the potential to support peatland of national importance and further information will be required. As outlined in the consultation report, it will need to be demonstrated that any significant effects on these areas can be substantially overcome by siting, design or other mitigation measures.</p>	<p>Further consideration of potential impacts on peatland habitats will be undertaken as the project progresses. This will include a peat probing campaign, and if deemed appropriate, the preparation of a Stage 1 Peat Management Plan and Peat Landslide Hazard Risk Assessment to support a future application for consent.</p>
	<p>NatureScot outlined that the potential for impacts on protected species will need to be fully assessed as part of any future application. NatureScot agreed that reference to existing information for nearby wind farm will be helpful when considering the scope of survey work required.</p> <p>NatureScot referred SSEN Transmission to their standing advice for the relevant species for further information and advice. They also advised that any mitigation proposed for protected species should be outlined in appropriate Species Protection Plans (SPPs) and be included as part of any future planning application.</p> <p>Furthermore, NatureScot outlined that SSEN Transmission will also need to consider if any species licences will be required for these works and contact the NatureScot Licensing Team regarding any licence applications.</p>	<p>Protected species surveys will be undertaken and appropriate mitigation set out, including reference to SSEN Transmission Species Protection Plans.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>NatureScot referred SSEN Transmission to their pre-application advice document for further advice on assessing landscape and visual impacts. NatureScot recognise that all three route options would lie within Wild Land Area (WLA) 34: Reay – Cassley.</p> <p>NatureScot acknowledge that the new OHL will sit within the context of Achany Wind Farm Extension (once built) and therefore additional effects from this proposal may not be significant. However, this should be assessed as part of a landscape and visual impact assessment, to inform any future planning application.</p>	<p>This advice is noted. Input from a landscape architect will continue through the alignment selection stage of the project, and a landscape and visual impact assessment will be undertaken to support a future application.</p>
<p>Scottish Environment Protection Agency (SEPA)</p>	<p>SEPA consider that the following key issues must be addressed in the formal application:</p> <ol style="list-style-type: none"> Minimising impacts on peat and peatland. Avoiding good quality or rare groundwater dependent terrestrial habitats (GWDTE) habitats and minimising impacts on other GWDTE habitats. Avoiding impacts on watercourses and other water features by ensuring suitable buffers and using best practice design crossings. Outlining the re-use of timber that is not considered merchantable. 	<p>This has been noted. These issues will be considered further as the project progresses, and detail will be provided in support of a consent application.</p>
	<p>SEPA state that all maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements.</p>	<p>This has been noted, all maps would be based on an adequate scale with which to assess the information.</p>
	<p>SEPA states that the site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing:</p> <ul style="list-style-type: none"> All proposed temporary or permanent infrastructure overlain with all lochs and watercourses. 	<p>Impacts on the water environment will be considered further as the project progresses, and appropriate details provided as part of a consent application.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<ul style="list-style-type: none"> • A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works. • Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds. 	
	<p>SEPA states that if water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.</p>	<p>No water abstractions or dewatering are anticipated to be proposed as part of the project.</p>
	<p>Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants must assess the likely effects of development on carbon dioxide (CO₂) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO₂ to the atmosphere. Developments must aim to minimise this release."</p>	<p>Further consideration of potential impacts on peatland habitats will be undertaken as the project progresses. This will include a peat probing campaign, and if deemed appropriate, the preparation of a Stage 1 Peat Management Plan and Peat Landslide Hazard Risk Assessment to support a future application for consent</p>
	<p>SEPA outlined that the planning submission must:</p> <ol style="list-style-type: none"> demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO₂, and; Outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas. 	<p>Further consideration of potential impacts on peatland habitats will be undertaken as the project progresses. This will include a peat probing campaign, and if deemed appropriate, the preparation of a Stage 1 Peat Management Plan and Peat Landslide Hazard Risk Assessment to support a future application for consent</p>
	<p>SEPA outlined that the planning submission must include:</p> <ol style="list-style-type: none"> A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Guidance on Developments on Peatland Survey (2017)) with all the built elements (including peat storage areas) overlain to demonstrate how the 	<p>This is noted. Appropriate detail on peat depths and management will be provided in support of a consent application.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>development avoids areas of deep peat and other sensitive receptors such as GWDTE.</p> <p>B. a table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.</p>	
	<p>Dependent upon the volumes of peat likely to be encountered and the scale of the development, SEPA advised that applicants must consider whether a full Peat Management Plan is required or whether the above information would be best submitted as part of the schedule of mitigation.</p>	<p>Further consideration of potential impacts on peatland habitats will be undertaken as the project progresses. This will include a peat probing campaign, and if deemed appropriate, the preparation of a Stage 1 Peat Management Plan and Peat Landslide Hazard Risk Assessment to support a future application for consent</p>
	<p>SEPA do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. Their advice on the minimisation of peat disturbance and peatland restoration may need to be considered when considering such assessments.</p>	<p>This has been noted.</p>
	<p>GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. SEPA requested that the following information must be included in submission:</p> <p>A. a map demonstrating that all GWDTE are out with a 100m radius of all excavations shallower than 1m and out with 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.</p> <p>B. If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA are likely to seek conditions securing appropriate mitigation for all GWDTE affected.</p> <p>SEPA advise the applicant to refer to their Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent</p>	<p>GWDTE habitats would be avoided as far as practicable with mitigation measures proposed where avoidance is not possible.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>Terrestrial Ecosystems for further advice and the minimum information they require to be submitted.</p>	
	<p>SEPA outlined that excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. They suggest that the submission must include:</p> <ul style="list-style-type: none"> A. A map demonstrating that all existing groundwater abstractions are out with a 100m radius of all excavations shallower than 1m and out with 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it. B. If minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected. 	<p>If it is deemed that excavation and other construction works would disrupt ground water flow and groundwater abstractions, the submissions would include mapping as requested, and identification of appropriate mitigation measures.</p>
	<p>Large scale felling can result in large amounts of waste material and i release of nutrients which can affect local water quality. The supporting information should refer to the current Forest Plan if one exists and measures should comply with the plan where possible.</p>	<p>Potential impacts of felling would be considered as the project progresses, and information provided in support of a consent application.</p>
	<p>Clear felling may be acceptable only in cases where planting took place on deep peat, and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats.</p>	<p>This is noted and will be reviewed once felling requirements are known.</p>
	<p>Scottish Planning Policy states (Paragraph 243) that "Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place." The submission must provide sufficient information to address this policy statement.</p>	<p>An assessment on the requirement of borrow pits would be made as the project progresses.</p>
	<p>One of SEPA's key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration.</p>	<p>Pollution prevention and silt control measures will be considered as the project progresses, and appropriate mitigation measures</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>SEPA outline that a schedule of mitigation supported by site-specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements.</p>	<p>will be set out within a schedule of mitigation to accompany a future consent application.</p>
	<p>SEPA outlined that the submission needs to demonstrate that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing.</p>	<p>It is not anticipated that the project would result in the discarding of materials that are likely to be classified as waste.</p>
Non-Statutory		
Forestry and Land Scotland (FLS)	<p>FLS suggested that, SSEN Transmission should consult the Linside Common Grazing committee.</p>	<p>The Linside Common Grazing committee have been contacted regarding consultation in relation to the route options, although have not provided a response to date.</p>
	<p>In response to the Consultation Document, FLS outlined that they had a number of concerns with the three route options and would therefore be objecting to the proposal, on the following grounds:</p> <ul style="list-style-type: none"> ○ The visual impact of the wayleave cutting across the hillside through mature forest. ○ The loss of tree cover due to the line cutting through mature conifer crop. ○ The impact the line will have on forest operations in the future due to the chosen preferred route. 	<p>. SSEN Transmission have consulted with FLS further to understand their concerns in more detail and in order for these concerns to inform identification of a proposed route and the consideration of alignment options as part of the alignment selection stage of the project.</p>
Highfield Forestry Limited (HFL)	<p>HFL noted that they would prefer the OHL to travel as much to the east of the Rosehall Wind Farm boundary as possible to limit forestry management issues.</p>	<p>This has been noted.</p>
	<p>HFL suggested that the route on the map is very wide, and it is therefore difficult to understand if the proposed development will affect them or not, they request further information regarding the exact routing if possible. HFL requested a clearer map in order to assess if an access agreement will be required between HFL and SSEN Transmission.</p>	<p>At this stage of the routeing process, route options are approximately 1 km in width. Once a proposed route is selected, alignment options are then identified and appraised within the 1 km route. Further consultation with HFL will be undertaken as the project progresses.</p>
	<p>HFL considered that the OHL may be an issue if the cables are particularly low as to restrict the type of vehicles they can bring onto their site. They believe there are guidelines for minimum heights. They would also expect 'goalposts' and extra</p>	<p>This would be discussed further with HFL during the alignment selection stage of the project to ensure HFL concerns are taken into consideration during the design of the project.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>signage around any track/ OHL crossings to ensure clearance and visibility of OHL is made clear to track users.</p>	
	<p>HFL advised that the OHL should not come within the topple height of a turbine plus a significant margin, considering possible ice throw. Also considering any crane operation around a turbine and the possibility of the crane toppling (for example, generator replacement).</p>	<p>This has been noted. No turbine would be within three times rotor diameter of the OHL as per SSEN Transmission guidance.</p>
	<p>HFL stated that habitat management across Rosehall is to be reviewed by the habitat manager once the OHL route has been defined. They outlined that they would like to discuss this further with SSEN Transmission to assess the potential impact on habitats.</p>	<p>SSEN Transmission would welcome further conversations with HFL on these points.</p>

6. COMMUNITY CONSULTATION RESPONSES FROM THE PUBLIC EXHIBITION EVENT

6.1 Introduction

6.1.1 **Table 6.1** sets out the feedback received by the local community and general public following the consultation period (October to January 2023), including comments received during the consultation events. Responses by SSEN Transmission are also included, setting out the action to be taken where relevant.

Table 6.1: Public and Local Community Feedback by Topic

Feedback Comments	Response by SSEN Transmission
Lairg Exhibition Responses	
<p>It was raised that an explanation as to why underground cables were not considered more would be welcome.</p>	<p>The most appropriate solution for the operation and maintenance of the network is considered to be OHL over UGC wherever possible.</p> <p>Maintenance of a line in the future must be considered. In the event of a fault on a line, the fault can be detected and rectified in a matter of days with OHL. However, if a fault occurs in an UGC, the time needed to locate and rectifying the fault increases and could potentially take months to fix and cause ongoing disruption to the land. This could result in the potential requirement for servitude on cable to ensure access. The servitude is usually 15 m wide and may require a degree of sterilisation.</p> <p>Undergrounding a line would result in increased impact to the surrounding ground, as well as the overall footprint of the project. The installation of UGC would require a cable trench, a 30 m construction zone with an approximately 6 m wide and 1.5 m deep trench to be dug. It is considered that this would increase potential to damage local environments during construction.</p> <p>The costs for UGC would also be approximately 4-6 times more expensive than an OHL option therefore not representing the best value for the consumer.</p>
<p>It was queried why Route Option 1a was included, as it is seemingly being dismissed, or removed as an option due to it coming across the Kyle of Sutherland SSSI.</p>	<p>Stage 2 (Route Selection) endeavoured to appraise a range of feasible route options between the two connection points at the proposed Achany Wind Farm Extension on-site substation to Shin substation.</p> <p>Due to constraints identified at the route selection stage, Route Option 1a is not considered the preference and will not be taken forward to Stage 3 (Alignment Selection).</p>
<p>It was mentioned that Route Option 1 passes close to several dwellings, which may be a concern to residents.</p>	<p>Any residents should have received information on the project by post and given the opportunity to raise their concerns.</p> <p>Proximity to dwellings will be considered further during Stage 3 (Alignment Selection) of the project and appropriate distances maintained as far as practicable.</p>

Feedback Comments	Response by SSEN Transmission
<p>It was noted that it was not entirely clear which route option was the preferred.</p>	<p>This has been noted. SSEN Transmission will endeavour to make this clearer at future consultation events.</p> <p>The preferred route option is Route Option 1.</p>
<p>It was mentioned that the resolution of maps shown was low, and therefore it was hard to read.</p>	<p>This comment has been noted for future consultation events.</p>
<p>It was raised that the public consultation event held in Lairg was useful, but that it may have been better placed at Rosehall, as Rosehall along with Darhm and Altrass are areas which may be affected more than Lairg. It was suggested that there could have been a larger attendance if the event was held in Rosehall.</p>	<p>This comment has been noted for future consultation events.</p> <p>Rosehall will be the location for the alignment selection stage consultation event. Consultation on the alignment options will likely take place in June 2023.</p>

7. IDENTIFICATION OF A PROPOSED ROUTE

7.1 Overview

7.1.1 SSEN Transmission has reviewed and considered the responses provided by stakeholders following the identification of a preferred route, as set out within the Achany Wind Farm Extension Grid Connection Consultation Document. Responses to each of the points raised by stakeholders through the consultation process are included in Sections 5 and 6 above.

7.1.2 SSEN Transmission has concluded from this review that the preferred route identified in the Consultation Document,² should be taken forward as the proposed route within which to identify and appraise alignment options. The proposed route can be seen in Figure 1.

7.1.3 The consultation process for the project raised a number of comments seeking clarification or setting requirements for further assessment. These points include additional detail on the connection, recommendations for continued consultation with stakeholders, and the importance of various surveys / assessments for protection of environmental aspects as the project progresses.

7.1.4 All comments received to date will be taken forward into Stage 3 (Alignment Selection), through which further survey work will be undertaken to further inform environmental and engineering constraints. This process will remain inclusive, seeking further consultation where appropriate. Formal consultation will be organised on completion of the alignment studies to enable comments to be sought on the preferred alignment identified.

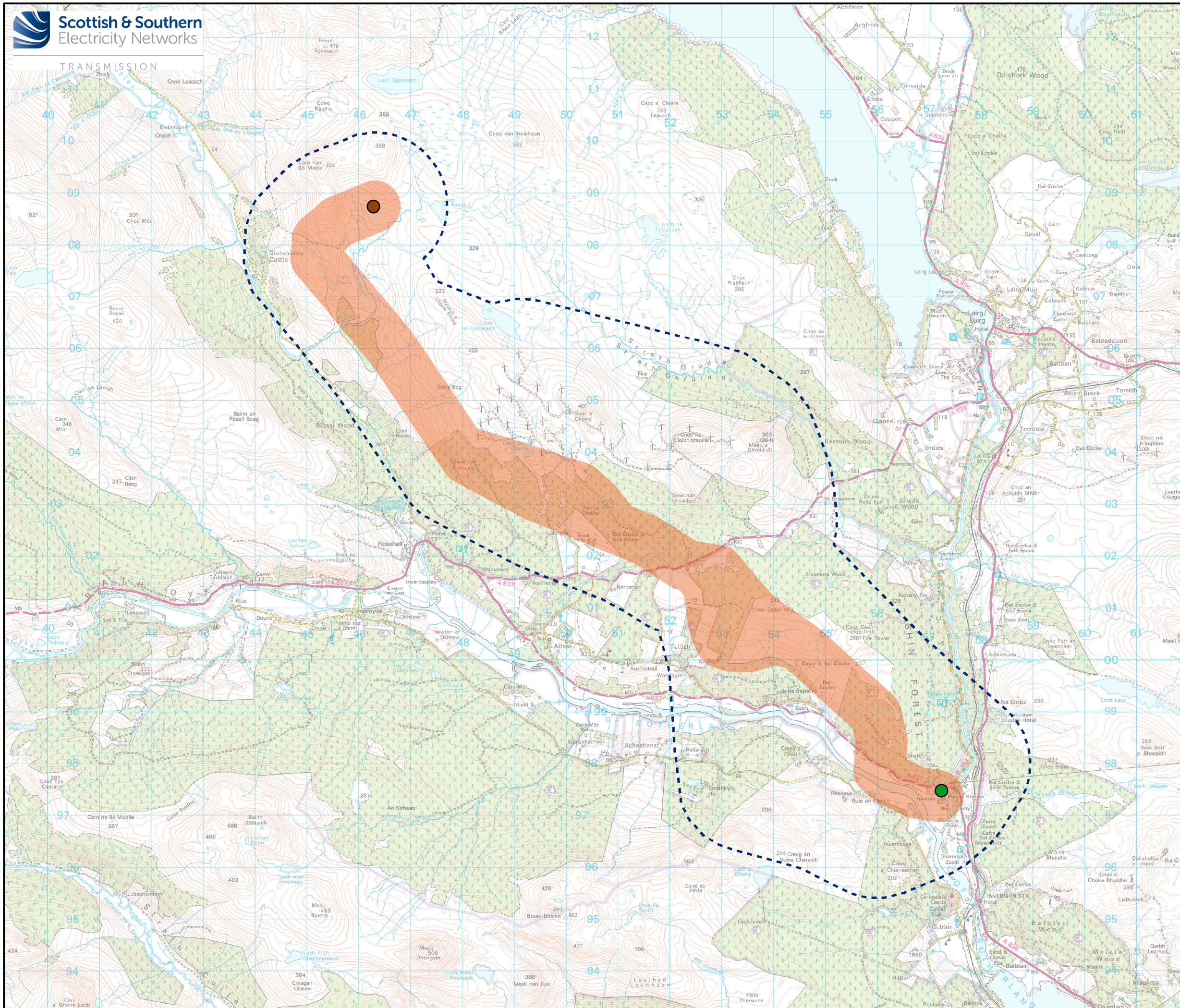
8. CONCLUSIONS AND NEXT STEPS

8.1 Conclusion





- 8.1.1 The proposed Achany Wind Farm Extension requires connection to the electricity transmission network at Shin substation. It is anticipated that this will be achieved via the construction and operation of a new 132 kV single circuit OHL routed between the proposed Achany Wind Farm Extension on-site substation and Shin substation.
- 8.1.2 This Report on Consultation documents the consultation process which has been undertaken for the project between October and January 2023. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the preferred route option.
- 8.1.3 This report has described the key responses received and provides detail on the actions proposed in response to the issues raised. The consultation process has largely confirmed that **Route Option 1** should be taken forward as the proposed route within which to identify and appraise alignment options.

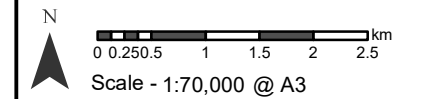
8.2 Next Steps

- 8.2.1 The project will then be taken into Stage 3 (Alignment Selection), commencing with identification of alignment options within the Preferred Route. These will be informed by this and further consultation exercises, and through detailed surveys, which may identify any additional and / or currently unknown engineering, environmental or land use constraints.
- 8.2.2 Consultation on the alignment options will likely take place in June 2023.



Legend

-  Study Corridor
-  Proposed Achany Wind Farm Extension Substation
-  Shin Substation
-  Proposed Route



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Project: Achany Extension Wind Farm
Grid Connection

Title: Figure 1 - Proposed Route

Drawn by: KM Date: 14/03/2023

Drawing: 122010-D1 -R-RoC-1.0.0