

Report on Consultation – Alignment Options
Bhlaraidh Extension Wind Farm Grid Connection
April 2022

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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 plc's works on communities, such as the effects of noise and disturbance from construction activities.
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.
Environmental Appraisal (EA)	Environmental Appraisals are carried out when a proposed development may give rise to some environmental effects. When a formal EIA is not required for a project, an EA can be undertaken, analysing a number of specialist environmental studies.
Environmental Impact Assessment (EIA)	Environmental Impact Assessment. A formal process codified by EU directive 2011/92/EU, and subsequently amended by Directive 2014/52/EU. The national regulations are set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. The EIA process is set out in Regulation 4(1) of the regulations and includes the preparation of an EIA Report by the developer to systematically identify, predict, assess and report on the likely significant environmental impacts of a proposed project or development.
GWDTTE	Ground Water Dependent Terrestrial Ecosystem
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).
Micrositing	The process of positioning individual structures to avoid localised environmental or technical constraints.
Mitigation	Term used to indicate avoidance, remediation or alleviation of adverse impacts.
Overhead line (OHL)	An electric line installed above ground, usually supported by lattice steel towers or poles.
Plantation Woodland	Woodland of any age that obviously originated from planting.

RAG Rating	Each topic within the environmental, technical and cost categories should be considered in terms of the potential for the development to be constrained and a Red/Amber/Green (RAG) rating applied as appropriate.
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 plc 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 into between a landowner upon whose land an overhead line is to be constructed and SSEN Transmission plc.

PREFACE

This Report on Consultation has been prepared by ASH design+assessment Limited on behalf of Scottish and Southern Electricity Networks Transmission (herein referred to as 'SSEN Transmission'), operating under licence as Scottish Hydro Electric Transmission plc. The document has been prepared 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 June and August 2021 in response to the Preferred Alignment identified for the Bhlaraidh Extension Wind Farm 132 kV overhead line between Bhlaraidh Extension Wind Farm on-site substation and Fort Augustus substation within Auchterawe, near Fort Augustus¹. Further consultation with involved landowners commenced prior to this most recent consultation stage and is ongoing.

Under normal circumstances, consultation on the project would involve public engagement events held in the local area. However, as a result of the COVID-19 pandemic this has not been possible.

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

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

The virtual consultation events took place via the project website <https://www.ssen-transmission.co.uk/projects/bhlaraidh-extension-windfarm-connection/> at the following times:

- 23 June 2021; 12.30pm – 3.00pm
- 23 June 2021; 4.30pm – 7.00pm
- 24 June 2021; 1.00pm – 3.00pm

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

¹ SSEN Transmission (June 2021): Bhlaraidh Extension Wind Farm Grid Connection Consultation Document – Alignment Options

EXECUTIVE SUMMARY

The proposed Bhlaraidh Extension Wind Farm (18 turbines, total capacity 100.8 MW) in the Highlands requires connection to the electricity transmission network at Fort Augustus substation by April 2026. It is anticipated that this would be achieved via the construction and operation of a new 132 kV single circuit Overhead Line (OHL). It is anticipated that the connections into Bhlaraidh on-site substation (approximately 3 km in length) and Fort Augustus substation (approximately 2 km in length) would be by underground cable (UGC). The UGC connection into Bhlaraidh on-site substation was not included in the Consultation Document. It arose from the feedback received to the Consultation Document and ongoing assessment works.

This Report on Consultation documents the consultation process which was undertaken for the project between June and August 2021. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for, and approach to, the selection of the Preferred Alignment.

This Report describes the key responses received and provides detail on the actions proposed in response to the issues raised. The consultation process has confirmed that the Preferred Alignment presented in the Alignment Consultation Report with the connection into Bhlaraidh on-site substation changed from OHL to UGC following the existing and proposed wind farm access tracks is the most appropriate alignment option, on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors. This alignment will become the Proposed Alignment taken forward as the project progresses through to the EA and Consenting Stage and be the subject of further study.

1. INTRODUCTION

1.1 Background and Purpose of Document

- 1.1.1 SSEN Transmission is proposing to construct a new 132 kV overhead line (OHL) between Bhlaraidh Extension Wind Farm on-site substation and Fort Augustus substation. The project is known as the Bhlaraidh Extension Wind Farm Grid Connection.
- 1.1.2 The project would comprise a new 132 kV single circuit OHL, the majority of which would be supported on a trident wood pole. This is the most economical option which minimises access requirements and environmental impacts during construction due to reduced foundation and access requirements. The Consultation Report assumed that in areas of higher elevation, exposure and wind loading require that more durable support structures be used, and SSEN Transmission's New Suite of Transmission Structures (NeSTS) monopoles, or similar, would be required. This section has since been changed to an UGC and follows a slightly different alignment as discussed in Section 2.3. The last section of the connection into Fort Augustus substation, approximately 2 km, would be underground cable (UGC).
- 1.1.3 In accordance with SSEN Transmission's guidance², a process of consultation on the Preferred Route has previously been undertaken (October to December 2020).
- 1.1.4 This Report on Consultation documents the consultation process for the project between June and August 2021, during the alignment selection stage of the project. The programme of consultation was designed to engage with key stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the Preferred Alignment³. Further consultation with involved landowners commenced prior to this most recent consultation stage and is ongoing.
- 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 June and August 2021;
 - To summarise feedback received from stakeholders (including landowner consultation falling outwith the June and August consultation period);
 - To document actions undertaken in response to feedback where relevant; and
 - To clearly set out how the Preferred Alignment 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 Alignment Options – describes how the Preferred Alignment was identified;

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

² SSEN (September 2020), Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above

³ Identified within the Bhlaraidh Extension Wind Farm Grid Connection Consultation Document – Alignment Options (June 2021), produced by SSEN Transmission

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

Section 6: Community and Landowner Responses – summarises the responses and key comments from members of the public and landowners;

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

Section 8: Conclusions and Next Steps – provides a summary of the conclusions reached and actions going forward.

2. PROJECT OVERVIEW

2.1 The Need for the Project

- 2.1.1 SSEN Transmission is a wholly owned subsidiary of the SSE plc group of companies. SSEN Transmission owns and maintains the electricity transmission network across the north of Scotland and holds a license under the Electricity Act 1989 to develop and maintain an efficient, co-ordinated and economical system of electricity transmission.
- 2.1.2 The proposed Bhlaraidh Extension Wind Farm (18 turbines, total capacity 100.8 MW) in the Highlands requires connection to the electricity transmission network at Fort Augustus substation by April 2026. It is anticipated that this would be achieved via the construction and operation of a new 132 kV single circuit OHL.
- 2.1.3 The new connection would be routed between the proposed Bhlaraidh Extension Wind Farm on-site substation and Fort Augustus substation (see **Figure 1**).

2.2 Preferred Technology Solution

- 2.2.1 Based on the options assessed, the preferred solution is a new 132 kV single circuit OHL supported on a trident wood pole⁴. This is the most economical option which minimises access requirements and environmental impacts during construction due to reduced foundation and access requirements.

2.3 Alternative Options Considered

- 2.3.1 SSEN Transmission has determined that a trident wood pole is the preferred technological solution for this project and would make use of this support structure for the OHL where possible. Some sections of ground within the Proposed Route are at an elevation unsuitable for wood pole structures, including the site of the Bhlaraidh Extension Wind Farm on-site substation. While it is possible in some instances to utilise wood pole structures up to 500 m AOD, issues such as exposure and wind loading necessitate deeper planting of poles and shorter spans, and stronger, more resilient structures tend to be favoured instead. These include steel lattice towers, composite or steel versions of the trident support, or NeSTS. Use of UGC is also a potential solution for areas of higher ground, but this can result in increased disruption of habitats and / or areas of peat soils, increased cost and additional maintenance challenges.
- 2.3.2 SSEN Transmission have a policy to avoid encroaching on a clearance zone from wind turbines that is equal to three times the magnitude of the rotor diameter with an OHL. This is because the 'wake effect' of the wind turbines within this clearance zone can cause excessive vibration on the OHL components. While the impact of the wake effect can vary depending on wind turbine height, local topography and specific OHL arrangements, the vibrations can lead to premature fatigue and failure of the OHL.
- 2.3.3 More information is now known about the potential impact at this site and it is not possible to achieve an OHL alignment that does not encroach on the three rotor diameter clearance. As a result, the NeSTS towers previously consulted on for use at higher altitude are now to be replaced with UGC. The proposed UGC would run in close proximity and parallel to the existing and proposed wind farm access tracks. This would utilise construction / operational corridors that would be disturbed during the construction of the wind farm potentially reducing some of the environmental effects normally associated with running UGC through undisturbed areas or with access tracks and foundations that would have been required to support the NeSTS structures. This option also has the potential to take advantage of construction efficiencies by laying ducts for the UGC while the wind farm developer is laying the wind farm access tracks.
- 2.3.4 Details of the above options are provided below. More detailed assessments and further consultation are required to identify the specific combination of technology options for the connection, however at this stage it is

⁴ The consideration of other technology options may be required in areas where particular physical or environmental constraints are identified.

understood that trident wood poles would be used for the majority of the connection, and UGC would be used at higher elevations near the Bhlaraidh Extension Wind Farm on-site substation and for the last section (approximately 2 km) connecting into Fort Augustus substation.

2.4 Proposals Overview

2.4.1 The trident wood poles would vary between 10 – 18m in height depending on the span length required. However, the average height of the structures across the OHL will be 16m (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 60-80 m apart. A photograph showing a typical wood pole trident line is shown in Plate 2.1 below.

General Construction Activities

2.4.2 To facilitate this connection, the main construction elements of the project are as follows:

- Establishment of suitable laydown areas for materials and installation of temporary track solutions as necessary;
- Delivery of structures and materials to site;
- Assembly and erection of wood pole structures and stays;
- Stringing of conductors using hauling ropes and winches; and
- Inspections and commissioning.

2.4.3 Installation of the wood poles would involve the following tasks:

- Excavation of a suitable area for the wood poles, and backfilling after installation of the pole (backfilling would generally be carried out the same day as excavation so that no open excavations are left overnight). The exact area would depend on the ground conditions at each pole;
- In some pole locations, it may be necessary to add imported hardcore backfill around the pole foundations to provide additional stability where the natural sub soils have poor compaction qualities;
- Conductors would be installed on the wood poles using full tension stringing to prevent the conductor coming into contact with the ground; and
- Remedial works would be carried out to reinstate the immediate vicinity of the structures, and any ground disturbed, to pre-existing condition. This would be undertaken using excavated material.

2.4.4 Plate 2.1 shows a photograph of a typical wood pole trident line for illustrative purposes.

Plate 2.1: Wood Pole Trident Configuration



Underground Cable

2.4.5 The connections into Bhlairaidh on-site substation (approximately 3 km in length) and Fort Augustus substation (approximately 2 km in length) would be formed of UGC given technical constraints around the wind farm and substation. The exact length and location where OHL will transition to UGC is not known at this stage. A trident sealing end structure would be utilised to transfer the OHL connection to UGC.

2.4.6 Where UGC is to be utilised, its installation would typically involve the following tasks:

- establish a working corridor approximately 30 m wide, centred on the cable centreline;
- excavate a trench up to 2 m in depth and 0.8 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.

2.5 Access during Construction

2.5.1 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 would 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. Although it is not anticipated that wood poles would require establishment of new access tracks, stone tracks (both temporary and permanent) may be necessary in some areas depending on existing access conditions, terrain, altitude and technology used (e.g. UGC).

3. CONSIDERATION OF ALIGNMENT OPTIONS

3.1 Introduction

3.1.1 The Consultation Document⁵ sets out the approach to the consideration and appraisal of alignment options, informed by SSEN Transmission's guidance 'Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above'. The guidance sets out SSEN Transmission's approach to selecting a route for an OHL. 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 consideration of the principles outlined in the guidance document, the method of identifying a preferred alignment in this study has involved the following four key tasks:

- Review and update, where required, of the baseline situation established at Stage 2;
- Identification of alignment options;
- Environmental analysis of alignment options; and
- Identification of an environmentally preferred alignment.

3.2 Identification of Preferred Alignment

3.2.1 The Preferred Alignment presented in the Consultation Document was selected on the basis that it was considered to provide an optimum balance of environmental, technical and economic factors. The overall preference identified through comparative analysis in the Consultation Document was Alignment Option 1 with alignment diversions 7, 1, 8A, 6A and 5. As discussed in Section 2.3 this has since been changed based on further study to include UGC on the approach to Bhlaraidh Extension Wind Farm following a slightly different alignment. This alignment is presented on **Figure 1**.

⁵ SSEN Transmission (June 2021) Bhlaraidh Extension Wind Farm Grid Connection Consultation Document – Alignment Options

4. THE CONSULTATION PROCESS

4.1 Consultation Overview

- 4.1.1 In accordance with SSEN Transmission's guidance⁶, a process of consultation on the Preferred Route has previously been undertaken. Formal consultation was carried out during Stage 2 of this project in order to obtain comments from statutory and non-statutory consultees, including members of the public. Further direct consultation was also carried out with affected landowners, namely Forestry and Land Scotland (FLS) and the estate which the Proposed Route passes through.
- 4.1.2 On 30th October 2020 a Consultation Report summarising the appraisals of the five route options was issued to statutory and non-statutory consultees for comment. **Appendix 1** summarises the feedback received from each consultee and the responses set out by SSEN Transmission within the Report on Consultation which followed. It is noted that Route Option 1A was presented as the Preferred Route to consultees at that stage and was revised to Route Option 1, a close second choice, following further consultation with FLS regarding its potential to avoid Caledonian pine wood areas and reduce the length of native woodland the OHL would pass through.
- 4.1.3 The responses issued by SSEN Transmission to consultees remain valid at this stage, and comments received have aided in selection of alignment options to appraise as part of this study.
- 4.1.4 In accordance with SSEN Transmission's guidance a similar process of consultation on the Preferred Alignment has now also been undertaken.

4.2 Methods for Consultation

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

Consultation Document

- 4.2.2 The Bhlaraidh Extension Wind Farm Grid Connection Consultation Document – Alignment Options (June 2021) was produced detailing the selection process for the Preferred Alignment, taking account of environmental, economic and technical factors. The Consultation Document on Alignment Selection was made available for download on 21st June 2021 from <https://www.ssen-transmission.co.uk/projects/bhlaraidh-extension-windfarm-connection/>.
- 4.2.3 **Table 4.1** details the stakeholders in receipt of the Consultation Document or otherwise informed of the website details:

Table 4.1: List of Stakeholders

Stakeholders	
Statutory Consultees	
Energy Consents Unit (ECU)	Historic Environment Scotland (HES)
NatureScot	Scottish Environment Protection Agency (SEPA)
The Highland Council (THC)	
Non-Statutory Consultees	
British Horse Society	British Telecom (BT)
Cairngorms National Park Authority	Civil Aviation Authority (CAA) - Airspace
Trees for Life	Defence Infrastructure Organisation

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

Fisheries Management Scotland	Forestry and Land Scotland (FLS)
Highland and Islands Airports (HIA)	John Muir Trust
Joint Radio Company (JRC)	Mountaineering Scotland
NATS Safeguarding	Ness Fishery Board
Royal Society for the Protection of Birds (RSPB)	Scottish Canoe Society
Scottish Executive Environment & Rural Affairs Department (SEERAD)	Scottish Forestry
Scottish Rights of Way and Access Society (Scotways)	Highland Raptor Study Group
Scottish Wild Land Group (SWLG)	Scottish Wildlife Trust
Sustrans Scotland	The Coal Authority
Transport Scotland	Visit Scotland
West of Scotland Archaeology Service	Fort Augustus and Glenmoriston Community Council

- 4.2.4 It had been intended to make the Consultation Document available in hard copy at publicly accessible locations near to the Corridor. However, as a result of the COVID-19 pandemic, this was not possible.
- 4.2.5 Instead, landowners, the local Community Council and councillors were made aware of the Consultation Document which was made available via the dedicated project website. Updates were issued via email to project website subscribers, the local community council and ward councillors.
- 4.2.6 Feedback on the Consultation Document was requested by 30th July 2021.
- 4.2.7 Stakeholders were invited to provide feedback by answering a series of questions asked within the Consultation Document requesting comments on specific aspects of the project as follows:
- Have we explained the need for this Project adequately?
 - Have we explained the approach taken to select the Preferred Alignment adequately?
 - Are there any factors, or environmental features, that you consider may have been overlooked during the preferred alignment selection process?
 - Do you feel, on balance, that the Preferred Alignment selected is the most appropriate for further consideration at the EA and Consenting stage?

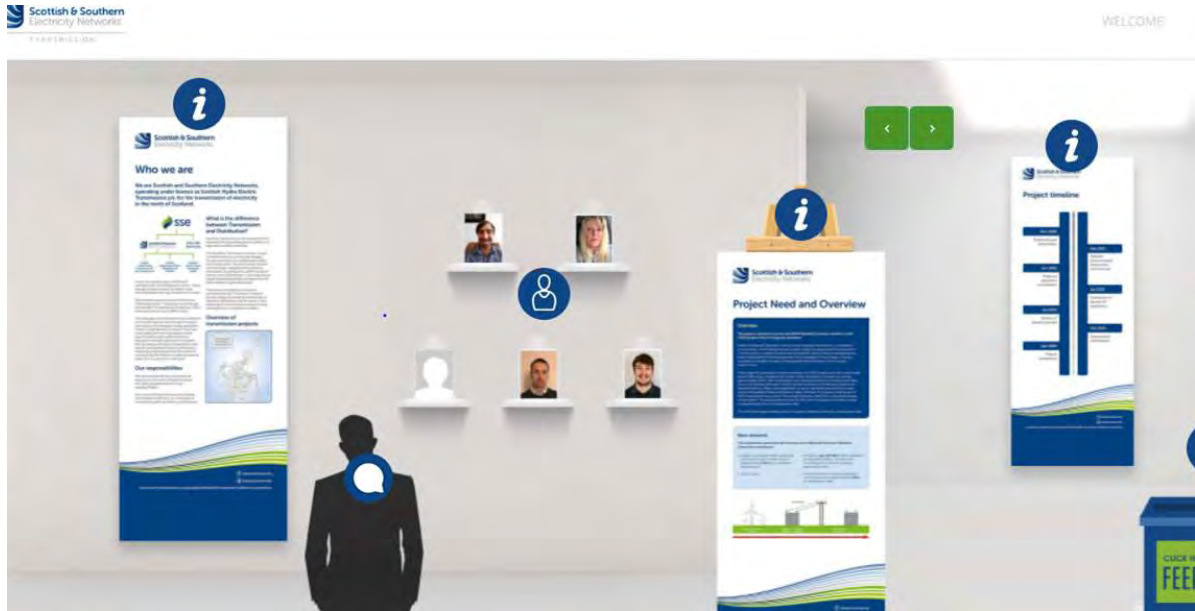
Public Consultation Events

- 4.2.8 Under normal circumstances, consultation on the project would involve public engagement events held in the local area. However, as a result of the COVID-19 pandemic this has not been possible.
- 4.2.9 To continue engagement on the project, SSEN Transmission developed an online consultation tool, to enable the local community to experience the full exhibition from home on a computer, tablet or mobile device. The online exhibition was designed to look and feel like a real consultation in a community hall, with exhibition boards, maps, interactive videos and the opportunity to share views on the proposals.
- 4.2.10 Visitors were able to engage directly with the project team, via a live chat function, where they could ask any questions they might have about the project and share their feedback on the current alignment options.
- 4.2.11 The virtual consultation events took place via the project website <https://www.ssen-transmission.co.uk/projects/bhlaraidh-extension-windfarm-connection/> at the following times:
- 23 June 2021; 12.30pm – 3.00pm
 - 23 June 2021; 4.30pm – 7.00pm

- 24th June 2021; 1.00pm – 3.00pm

4.2.12 The session held on 24 June from 1.00pm – 3.00pm was scheduled due to a programmed power cut in the Glenmoriston area which occurred during the second session on 23 June.

Plate 4.1: Virtual Event Portal



4.2.13 The virtual consultation events were advertised in the local press, SSEN Transmission’s social media channels and the dedicated project management website. A mail drop of a booklet and letter informing of the event was also carried out to 749 households along the alignment options ahead of the virtual consultation.

4.2.14 Visitor counts during the virtual consultation event recorded 11 unique users (individual devices accessing the site) across the three interactive sessions. Only one chat was initiated with the project team via the live chat function to raise one query. One associated follow up email was received by SSEN Transmission further to the virtual consultation events.

5. CONSULTATION RESPONSES FROM STATUTORY AND NON-STATUTORY CONSULTEES

5.1 Introduction

5.1.1 **Table 5.1** sets out a summary of the feedback received by statutory and non-statutory consultees following the consultation period (June to August 2021). A response to the feedback is also provided by SSEN Transmission, together with confirmation of the action to be taken, where relevant.

5.1.2 The following consultees did not provide any feedback to the consultation:

- ECU;
- CAA – Airspace;
- Defence Infrastructure Organisation;
- Fisheries Management Scotland;
- Mountaineering Scotland;
- Ness Fishery Board;
- Scottish Canoe Society;
- SEERAD;
- Scottish Forestry;
- Scotways;
- SWLG;
- Scottish Wildlife Trust;
- Trees for Life;
- Visit Scotland; and
- West of Scotland Archaeology Service.

Table 5.1: Statutory and Non-Statutory Consultee Feedback

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Statutory		
Historic Environment Scotland (HES)	<p>HES have previously provided advice to the applicant in 2020 on five route options. HES were content with the preferred route option at that time (option 1A) and did not identify any potential significant effects from that option or two others (options 1 and 3). HES indicated the potential for some impacts from route options 2 and 2A on Cherry Island, crannog, Inchnacardog Bay, Loch Ness (SM 9762), however these were unlikely to be significant.</p> <p>Scheduled monuments and category A listed buildings in the area surrounding the proposed OHL include:</p> <ul style="list-style-type: none"> • Levishie Cottage, fort and earthwork 1050m NE of (SM 4567) • Dundreggan Farm, note 35m SW of (SM 11875) • Caledonian Canal (SM 6497) • Glenmoriston, Torgoyle Bridge over River Moriston (LB 14996) 	<p>Noted. The Proposed Route has since been identified as Route Option 1, which has comparable constraints with Route Option 1A in relation to Cultural Heritage. The noted designated sites have been taken into account during the selection of alignment options.</p>
	<p>Option 1 is now the preferred route which, as noted above, HES have suggested previously is unlikely to have significant effects for its interests and this continues to be the case. One possible alignment diversion (Diversion 1) would take the new OHL closer to Dundreggan Farm, mote (SM 11875) by around 200 m or so. However, Diversion 1 would still be more than 500 m from the scheduled monument and the proposed OHL on this route would be unlikely to have significant impacts on the asset's setting. Consequently, HES do not have any further detailed comment to make on the diversion options because none are likely to have significant impacts for our interests.</p>	<p>Noted. The Preferred Alignment makes partial use of Diversion Option 1 in the area north-west of Bhlaraidh but passes the Dundreggan Farm, motte on Alignment Option 1, on the far side of the River Moriston.</p>

	<p>Key points:</p> <p>Direct impacts on assets within HES' remit are unlikely.</p> <ul style="list-style-type: none"> • Unlikely that impacts on the setting of designated assets within HES' remit in the surrounding area will be significant. • Potential for impacts on undesignated assets should be discussed with Local Authority historic environment advisors. • Assessment of impact on historic environment, including impacts on the setting of assets in the surrounding area to confirm the potential effects and determine effects on undesignated assets to be submitted with the application. 	<p>Noted. Likely impacts on cultural heritage interests will be explored as part of the EA, with Screening (and Scoping, if appropriate) consultations carried out with the local planning authority and HES.</p>
<p>NatureScot</p>	<p>Otter are known to be present in the River Moriston and likely to use the smaller tributaries that flow into it. Bats may also be present on site and survey work to determine their presence should be undertaken. Bats and otters are European Protected Species (EPS) listed on Annex IV of EC Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna.</p> <p>Other protected species may be present on the site such as badger, pine marten, red squirrel and water vole and survey work should be designed to pick up any signs of other protected species.</p>	<p>Suitable habitats for the noted species have been identified during routeing and alignment options assessment, with some field signs of otter, pine marten and badger picked up during initial walkover surveys. An Extended Phase 1 walkover survey will be carried out as part of the EA to identify field signs of EPS.</p>
	<p>This proposal crosses over and runs alongside the River Moriston Special Area of Conservation (SAC) designated for its freshwater pearl mussel and Atlantic salmon interest. Freshwater pearl mussel are very sensitive to changes in water quality and sedimentation of the water. As a result, SSEN Transmission should provide details of sediment management protocols during construction and pollution prevention measures. NatureScot would advise against any work occurring within the watercourse itself; should this be unavoidable it should be discussed with NatureScot at the earliest opportunity.</p> <p>From the details provided, it is unlikely that any planned works will create a barrier to salmon movement in the river, however if this is not the case then further consideration will be required.</p>	<p>The River Moriston SAC and its qualifying features have been identified as part of the alignment options appraisal and the sensitivity of freshwater pearl mussel to changes in water quality noted. This has factored into the development design to observe appropriate separation distance from the riverbanks and minimise risk of sediment runoff and pollution incidents. Sediment management protocols will be provided as part of the Construction Environmental Management Plan.</p>

<p>Scottish Environment Protection Agency (SEPA)</p>	<p><u>Impact on Peat and wetlands, including GDTWEs</u></p> <ol style="list-style-type: none"> 1. The Preferred Route passes through some areas of blanket bog / wetlands which could have an impact on sensitive environmental receptors including peat and Groundwater Dependent Terrestrial Ecosystems (GWDTE). 2. GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. A map demonstrating that all GWDTE are outwith a 100 m radius of all excavations shallower than 1 m and outwith 250 m of all excavations deeper than 1 m must be submitted. 3. No poles of associated construction works should be located in any wetland areas identified as part of an extended Phase 1 habitat survey, which should be carried out for all un-forested areas. If this is not possible then SEPA's Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems should be followed. 4. SEPA request that the infrastructure (including the proposed locations of all the wooden poles and access tracks etc.) are overlain on the habitat maps in order that any potential impacts of the proposed works on GWDTEs can be accurately assessed. 5. In sensitive peat and wetland areas, SEPA would welcome the use of low pressure tracked vehicles over boggy / soft grounds and for bog matting to be utilised rather than stone tracks, as they will have a lower impact on the habitats. SEPA would also request that trips to and from the pole locations on the sensitive habitats are kept to a minimum to reduce potential damage. This must be clearly demonstrated on a site plan and should specifically be addressed within the Schedule of Mitigation. 6. Information should be provided on how impacts on deep peat, over 1 m in depth, will be avoided, and it should be noted that areas of deep peat can still occur in forested areas. 7. The planning submission must: <ol style="list-style-type: none"> a. Demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO₂; and b. Outline the preventative / mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction 	<ol style="list-style-type: none"> 1. Noted. 2. Mapping will be provided with the EA identifying all GWDTE areas with all infrastructure associated with the development overlain. 3. An Extended Phase 1 habitat survey will be carried out as part of the EA to identify wetland areas. Infrastructure associated with the development will be situated outwith these areas where possible, with a micrositing allowance applied to the Proposed Alignment to allow for movement of pole locations away from wetland areas. 4. Mapping will be provided with the EA identifying all habitats identified as part of the Extended Phase 1 walkover surveys, including GWDTE areas, with all infrastructure associated with the development overlain. 5. Low pressure tracked vehicles will be utilised where practicable to reduce ground disturbance. It is currently anticipated that no stone tracks would be required for wood pole sections of the connection, and instead temporary track solutions may be employed, where required. Trips across sensitive habitats will be kept to a minimum. Access tracks will be set out on plans accompanying the EA and the Schedule of Mitigation will identify these points. 6. Information relating to impacts on peat soils will be included as part of the EA. 7. The EA will include the required information on CO₂ release and measures to avoid drying of peat soils. 8. A map of peat depths underlying the development area will be included as part of the EA, which will include all built elements overlain. A table of the quantities of peat soils and measures to re-use and keep wet will be included with the EA. 9. The development will be in accordance with the noted guidance documents. 10. The requirement for a Peat Management Plan to accompany the EA will be determined through the assessment process. 11. At this stage it is not anticipated that on-site borrow pits will be required. However, in the event that this changes then borrow pit
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	<p>of access tracks, drainage channels, trenches or the storage and re-use of excavated peat.</p> <ol style="list-style-type: none"> 8. The submission must include: <ol style="list-style-type: none"> a. 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 – Peatland Survey (2017)) with all the built elements, including peat storage areas, overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as GWDTEs; and 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. 9. Proposals must be in accordance with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste and SEPA’s Developments on Peat and Off-Site Uses of Waste Peat. 10. Dependent upon the volumes of peat likely to be encountered and the scale of the development, 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. 11. It is unclear at this stage whether borrow pits are required. If borrow pits are required these will also have to be covered by all assessments and surveys and SEPA would encourage early consultations of all peat depth and NVC surveys, as well as peat re-use proposals. 12. As highlighted at the consultation meeting on 9th June 2021, SEPA would expect all site plans to make it clear what infrastructure (including tracks) will be permanent, and which will be temporary. All proposed temporary and permanent tracks need to be clearly presented and overlain with peat and NVC surveys (including any proposed borrow pits). 13. A Schedule of Mitigation supported by site-specific maps must be submitted. These must include reference to best practice pollution prevention and construction techniques and regulatory requirements. They should set out the daily responsibilities of ECoWs, how site inspections will 	<p>usage will form part of assessment and early consultation will be carried out with SEPA in regard to this.</p> <ol style="list-style-type: none"> 12. Figures accompanying the EA will identify which elements of the development are permanent and which are temporary, overlain on peat and habitat plans. 13. A Schedule of Mitigation will accompany the EA, which will reference the supporting figures and reference the appropriate pollution prevention guidance and regulatory requirements and set out best practice construction techniques for use as part of the development. Information relating the responsibilities of ECoWs will also be included.
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	<p>be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to Guidance for Pollution Prevention (GPPs).</p>	
	<p>As part of the preferred route crosses forested areas, SEPA will require reassurance that any felled timber will be removed from site and not left as waste and avoids large scale felling as this can result in a peak in release of nutrients that can affect local water quality. Proposals to make use of any waste wood on the site should comply with the SEPA Guidance: Management of Forestry Waste and there must be a clear beneficial use identified for any material left on site.</p> <p>Tree felling proposals should be shown to meet the requirements of Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, NatureScot and FCS.</p>	<p>Forestry removal will be kept to a minimum, where it cannot be avoided, in order to reduce impacts on forestry interests. The preference will be to remove any felled timber from site; however, any timber left as waste will comply with the noted guidance.</p> <p>Tree felling proposals will accord with the noted guidance.</p>
	<p>No poles or associated construction works should be located within a 50 m buffer of all water bodies. A map should be provided which clearly demonstrates that works, with the exception of where tracks need to cross watercourses, are outside of this buffer.</p>	<p>A separation buffer of 50 m will be applied where practicable to all water bodies, and these will be displayed on mapping accompanying the EA.</p>
	<p>Due to their small footprint, development such as the poles / steel lattice towers do not usually create or increase flooding to nearby receptors in their local vicinity. Any risk (potential damage) to these structures could largely be avoided through good design and appropriate buffer zones.</p>	<p>Noted. Infrastructure associated with the development will be located away from watercourses and water bodies and their associated flood risk zones.</p>
	<p>New temporary access tracks, any workers accommodation bases and construction compounds / lay down areas should comply with Appendix 2 of SEPA's Standing Advice with regards to flood risk.</p>	<p>The advice in regard to flood risk will be accorded with.</p>
	<p>SEPA presume there will be no new permanent watercourse crossings. Proposals for temporary crossings should be outlined.</p>	<p>Temporary watercourse crossings will be outlined as part of the EA. If any permanent watercourse crossings are required these will be outlined as well.</p>
	<p>Further advice and best practice guidance is available within the water engineering section of SEPA's website. Guidance on the design of water crossings can be found in SEPA's Construction of River Crossings Good Practice Guide. Watercourse crossings should be designed to accommodate the 1 in 200 year flow, or information provided to justify smaller structures.</p>	<p>The noted guidance will be referred to for any watercourse crossings required as part of the development.</p>

	<p>SEPA note from Figure 6d private water supplies have already been identified. The submission must include:</p> <ol style="list-style-type: none"> 1. A map demonstrating that all existing groundwater abstractions are outwith a 100 m radius of all excavations shallower than 1 m and outwith 250 m of all excavations deeper than 1 m 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. 2. 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 existing groundwater abstractions affected. 	<p>Existing groundwater abstractions will be identified on plans accompanying the EA with the development infrastructure overlain, and separation buffers will account for micro-siting. If the buffers cannot be achieved then a risk assessment will accompany the application.</p>
	<p>SEPA welcomes pre-application engagement, but please be aware that their advice at this stage is based on emerging proposals and they cannot rule out potential further information requests as the project develops. Similarly, their advice is given without prejudice to THC's formal planning response, or any decision made on elements of the proposal regulated by THC, which may take into account factors not considered at the pre-application or planning stage.</p> <ul style="list-style-type: none"> • SEPA would welcome the opportunity to comment on the draft submission. They can process files of a maximum size of only 25 MB, the submission must be divided into appropriately named sections of less than 25 MB each. • Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of their website. • Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs). • Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention 	<ul style="list-style-type: none"> • File sizes will be limited to 25 MB. • Noted. • Noted. It is not currently anticipated that any works requiring CAR licences will form part of the development. • Noted. The need for further environmental licences will be identified. • Noted. It is not currently anticipated that any new tracks would be in excess of 5 km in length. • It is not currently anticipated that any water abstractions or dewatering would be required as part of the development.

	<p>and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.</p> <ul style="list-style-type: none"> The applicant may need to apply for a construction site licence under CAR for water management should a new track be proposed that is in excess of 5 km or for any major upgrades to existing tracks. Please refer to the Guidance on pollution control and management of surface water run-off for specific forestry activities for further advice. If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided in the schedule of mitigation. This aspect of the proposal may also require CAR authorisation. 	
The Highland Council (THC)	<p>The need for the project has been explained and the Planning Authority are supportive of appropriately located and designed electricity transmission infrastructure, particularly where this facilitates the transition away from the reliance upon fossil fuels towards a more renewable form of energy to meet our electricity needs. In this instance the grid connection will facilitate the transfer of electricity from the proposed Bhlairidh Extension Wind Farm to the National Grid.</p>	Noted.
	<p>The preferred alignment and overall design approach are generally robust in seeking to balance technical and landscape / visual requirements and seems the most logical when construction and maintenance factors are added in because of the proximity to existing OHLs and present access and maintenance arrangements. The proposed development is located within an area which contains existing / consented wirescape and energy related infrastructure, limiting the degree to which the development introduces new characteristics to the landscape. However, there is a need to address the interaction with existing OHLs and location and appearance of any Sealing End Compounds and other structures. Visualisations will be required in part to provide a greater understanding of the cumulative impact. There is a preference for the rationalisation / sharing of the existing infrastructure, however, if this is not feasible or would lead to an increase in impacts then this should be detailed in the application.</p>	<p>Photomontage visualisations will be provided with the EA to support the landscape and visual impact assessment, which will include a cumulative impact assessment. Opportunities to rationalise the development with existing infrastructure have been explored as part of the alignment options appraisal and the Preferred Alignment has been selected partially on the basis of maintaining close proximity to existing OHL developments in the area. At present, the Preferred Alignment would be a fully new OHL and underground cable rather than share any existing infrastructure, however if opportunities arise during further development design stages to do so then this will be explored further.</p>
	<p>Although further assessments / information would be required if an application was to come forward, as detailed within this and other consultee responses, it is likely that with appropriate mitigation the Planning Authority would be in a position to support the proposed development.</p>	<p>Noted. Further detailed assessments will be set out within the EA to support the planning application.</p>

	<p>A Sustainable Design Statement, in line with the Council's Sustainable Design Guide: Supplementary Guidance, is required. The Council encourages the inclusion of electric car charging facilities with all new developments. A strategy for the provision of charging points within the development should be submitted with the application.</p>	<p>Further consultation with THC will be requested. Owing to the type of development it is considered the wider premise of a Sustainable Design Statement is not relevant to the project. As such it is suggested that a brief overview / statement is included in the Design and Access Statement. Opportunity for inclusion of temporary charging facilities within the Contractors temporary construction compound(s) will be explored prior to commencement of works.</p> <p>The substation associated with the Bhlaraidh Extension Wind Farm development will be included in the Developer's S36 application.</p>
	<p>The design life for the facility should be set out within the submission with a financial guarantee being required to ensure the removal of any redundant infrastructure, restore the site with the land returning to a productive state after use.</p>	<p>The design life will be set out within the submission / EA however at this moment in time the consent requested would be in perpetuity and any requirement for financial guarantee for removal of any redundant infrastructure would be discussed with THC. However, it is considered such guarantee is not required.</p>
	<p><u>Landscape and Visual Impact</u></p> <ol style="list-style-type: none"> 1. The rationale for the proposed alignment seems reasonably clear and rational, and the aim to minimise tree loss and visual impacts is welcomed. 2. There is a need to ensure the gateway qualities of the local landscape are protected, which are addressed in the Highland Council Onshore Wind Energy Supplementary Guidance: Loch Ness Landscape Sensitivity Study. The visual impacts experienced by recreational users of the outdoors also need to be considered. 3. It is understood from the pre-application meeting held with SSEN Transmission that the necessary tree felling through the glen will not be highly visible from the road, but this will need to be clearly demonstrated, along with clear demonstration of the likely appearance and effect of the A887 itself as well as any local recreational routes and the long-distance trails within the area. 4. As the layout and design process evolves, we would welcome SSEN Transmission sharing the location of viewpoints with the Council to allow us to provide further consideration and advice through the EIA Scoping stage. Viewpoints should include receptors from roads, residential properties and nearby hills. Selection will need to take into account any potential loss of woodland. It should also address such aspects as interaction with existing 	<ol style="list-style-type: none"> 1. Noted. 2. The EA will include a full landscape and visual impact assessment, identifying the likely impacts on gateway qualities of the local landscape and on users or recreational routes and outdoor areas. 3. The landscape and visual impact assessment will identify the likely impacts associated with woodland removal on nearby roads and routes. 4. Viewpoints for photomontage visualisations will be discussed and agreed with THC prior to carrying out photography, and visualisations will be produced in accordance with the Council's visualisation standards.

	<p>OHLs and location and appearance of any Sealing End Compounds and other structures. All visualisations should be produced in accordance with the Council's Visualisation Standards.</p>	
	<p>In line with the Government's Control of Woodland Removal Policy (2009), woodland removal should be kept to a minimum and where woodland is felled it should be replanted. However, this policy only supports woodland removal where it would achieve significant and clearly defined public benefits. Where this involves woodland removal, compensatory planting will be required.</p> <p>HwLDP Policy 52: Development in woodland also requires the applicant to demonstrate the need to develop a wooded site and to show that the site has capacity to accommodate the development. The Council will maintain a strong presumption in favour of protecting woodland resources. Within the boundary of the site, there are multiple areas of native woodland (as shown on the NWSS) which the applicant is strongly encouraged to retain and protect from damage wherever possible.</p>	<p>Woodland removal associated with the development will be kept to a minimum where possible. Some woodland loss will be required to accommodate the new connection, and this will be identified as part of the EA.</p> <p>Removal of native woodland will be avoided as far as possible, and any felling requirements minimised.</p>
	<p>SSEN Transmission's policy and toolkit for providing a biodiversity net gain (BNG) for projects is actively welcomed by the Planning Authority. Full details of the BNG assessment, proposed commitments and details of long-term monitoring should be included in the application.</p>	<p>A BNG Report setting out the assessment of biodiversity impacts and proposals for biodiversity enhancement will be included with the EA.</p>
	<p>The Design Quality and Place Making policy (Policy 29) in the HwLDP requires new development to be designed to make a positive contribution to the architectural and visual quality of the area. Furthermore, development proposals must demonstrate sensitivity and respect towards the local distinctiveness of the landscape, architecture, design and layouts of their proposals.</p>	<p>Noted. The development design has been progressed in line with SSEN Transmission's Routeing guidelines which include consideration of landscape and visual constraints, and the application will include an assessment of landscape and visual impacts, accounting for the visual quality and sensitivity of the area.</p>
	<p>It is noted that five routes have been considered and that the preferred route is 1A. The rationale for this selection is understood and appears to utilise existing infrastructure corridors and there is no obvious route that would have a significantly lower environmental impact. We support the potential underground sections to minimise visual impact and removal of forestry. THC's preference will be a route which makes the most use of previously disturbed ground and aligns itself with existing infrastructure corridors. Where feasible cabling should be laid in areas of previously disturbed ground, and it should be ensured that any trenches do not become preferential flow pathways.</p>	<p>Noted. The Proposed Route has since been amended to Route Option 1 which largely overlaps Route Option 1A but more closely follows the existing Beauly – Denny infrastructure corridor. The connection into the Bhlaraidh Extension Wind Farm on-site substation and the last 2 km (approximate) of the connection to Fort Augustus substation will be underground cable. Cable trenches will be designed to minimise potential to become preferential flow pathways.</p>

	<p>The use of Trident Wood Poles is welcomed, on more elevated land it is understood that the wooden poles are not technically appropriate. In these instances, the use of the NeSTS structure is considered to be preferable over the steel lattice towers. The application needs to make it very clear which model is being used in each location and the rationale for the choice.</p>	<p>Further information is now known about the potential impact at this site of the turbine 'wake effect' and it is not possible to achieve an OHL alignment that does not encroach on the three rotor diameter clearance. As a result, since the Consultation Document was issued, the approach to the Bhlaraidh Extension Wind Farm on-site substation has been changed to be UGC rather than NeSTS structures.</p>
	<p>Further consideration should be given to line rationalisation wherever possible due to the complicated wirescapes being created by the convergence of connections around Auchterawe. If this is not a feasible approach or would for instance require the introduction of larger lattice towers which would have a greater visual impact, then this needs to be explained in full in the supporting documentation accompanying the application.</p>	<p>The EA will include a landscape and visual impact assessment, and this will address impacts in the area around Auchterawe / Fort Augustus substation. As the last 2 km (approximate) of the connection to Fort Augustus substation will be underground cable rather than OHL, it is currently anticipated that local landscape and visual impacts would be limited to the construction phase, with disturbed ground reinstated following installation. This will be explored in full as part of the landscape and visual impact assessment.</p> <p>The EA will set out alternative options considered including line rationalisation and the reasons why the alternative options have been discounted.</p>
	<p>The request for a limit of deviation (LoD) of 100 m should be explained in the application and it may be that in more sensitive locations a lower LoD should be expected.</p>	<p>The rationale for the LoD will be set out within the EA and areas identified where the LoD is reduced to reduce or avoid impacts upon more sensitive areas.</p>
	<p>Full layout details of the construction works should be submitted at a scale which allows the detail to be understood. The working corridor should be shown on a plan, accompanied by all associated construction works including access routes, laydown areas and construction compounds. THC would also request that existing tracks be utilised as much as possible.</p>	<p>Figures will accompany the EA identifying the requested details as appropriate scales. Existing access tracks will be utilised as far as practicable, with requirements for new permanent access tracks kept to a minimum.</p>
	<p><u>Design and Access Statement</u></p> <p>The Design and Access Statement should outline the design principles and concepts that have been applied to the development and:</p> <ol style="list-style-type: none"> 1. Explain the policy or approach adopted as to design and how any policies relating to design in the development plan have been taken into account. 2. Describe the steps taken to appraise the context of the development and demonstrates how the design of the development takes that context into account in relation to its proposed use. 3. State what, if any, consultation has been undertaken on issues relating to the design principles and concepts that have been applied to the 	<p>The Design and Access Statement will include the noted information and consultations carried out. The noted advice will be reviewed in preparation of the Statement.</p>

	<p>development; and what account has been taken of the outcome of any such consultation.</p> <p>Further advice on the preparation of design statements is contained in THC's advice note on Design and Access Statement and Scottish Government Planning Advice Note 68.</p>	
	<p><u>Amenity</u></p> <p>Noise Impacts – Operational: It is unlikely that noise from the development, once operational, will be an issue; however, it is recommended that, all other considerations being equal, the chosen route be furthest from existing sensitive properties.</p> <p>Noise Impacts – Construction: Planning conditions are not used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. However, where there is potential for disturbance from construction noise the application will need to include a noise assessment.</p> <p>A construction noise assessment will be required in the following circumstances:</p> <ul style="list-style-type: none"> • Where it is proposed to undertake work which is audible at the curtilage of any noise sensitive receptor, outwith the hours Mon-Fri 8am to 7pm; Sat 8am to 1pm; or • Where noise levels during the above periods are likely to exceed 75 dB(A) for short term works or 55 dB(A) for long term works. Both measurements to be taken as a 1hr L_{Aeq} at the curtilage of any noise sensitive receptor. (Generally, long term work is taken to be more than 6 months) <p>If an assessment is submitted, it should be carried out in accordance with BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open sites - Part 1: Noise". Details of any mitigation measures should be provided including proposed hours of operation.</p> <p>Regardless of whether a construction noise assessment is required, it is expected that the developer / contractor will employ the best practicable means to reduce the impact of noise from construction activities. The applicant will be required to submit a scheme demonstrating how this will be implemented.</p>	<p>The final alignment chosen for the development will seek to maintain appropriate separation distances from noise sensitive receptors, on balance with other factors, to minimise operational noise impacts.</p> <p>Noted. A noise impact assessment will be included in the event that the noted thresholds are likely to be exceeded and carried out in accordance with the noted British Standard. The Construction Environmental Management Plan will include measures to mitigate noise during the construction stage.</p> <p>Measures for dust control / suppression will be included within the Construction Environmental Management Plan.</p>

	<p>Dust: The applicant will be required to submit a scheme for the suppression of dust during the construction phase.</p>	
	<p>The A887(T) is a Trunk Road managed by Transport Scotland. All issues associated with crossing and taking access from that route will need to be resolved through Transport Scotland.</p>	<p>Noted. Transport Scotland have been consulted and their comments are included later in this Report.</p>
	<p>The preferred Route Option 1 has the potential to impact on the U1659 Inverwick Road that comes off the A877 at Torgyle Bridge. The Local Area Roads Office have clarified that this route is in a poor condition and not suited for use by large heavy construction vehicles. Any such access requirements using this route should clarify how the route will be upgraded to be suitable for the proposed construction access needs. The suitability of the junction with the A887(T) will need to be agreed with Transport Scotland as the responsible body for the A887 Trunk Road.</p>	<p>Noted. In the event that the U1659 is required for use during construction details of its proposed upgrade will be provided. Suitability of the junction with the A887 will be agreed with Transport Scotland.</p>
	<p>The submitted information suggests that construction access will also be taken from the U1663 Auchteraw Road. This route has had recent improvements associated with the substation expansion; however, the submission should again clarify the anticipated access needs and impacts on this local public road and justify that the route is capable of safely accommodating those access needs. The location and form of any temporary access taken off that road will need to be fully justified in any submission made. This will include the junction form, location and visibility, which will be reviewed against the requirements set out within THC's published Roads and Transport Guidelines for New Developments.</p>	<p>The importance of the road for local access is understood from previous projects and consultations in the area of Auchterawe and its proposed use for access during construction will be identified and justified.</p>
	<p>Any submission should include a Framework Construction Traffic Management Plan setting out how access for Contractors and Suppliers during the works will be controlled / restricted to limit impacts on other general users of the public roads impacted and neighbours to those routes. This should propose measures to effectively manage impacts during the busier times of day (e.g. during school opening and closing times), what steps will be taken to prevent parking, loading and unloading on the local public roads and how those roads will be kept clean from any construction-related materials being brought onto them.</p>	<p>A Construction Traffic Management Plan will be provided and include the noted information.</p>
	<p>The routing of construction traffic between the A82 Trunk Road and the U1663 Auchteraw Road should also be clarified in any submission made. For clarity, THC would expect such routing to follow the same route used to access the substation</p>	<p>The Construction Traffic Management Plan will include details of access routes to be used by construction traffic. It is currently anticipated that the route used previously for substation works would be used for this</p>

	<p>works. No construction access would be permitted along Free Church Road or south along the Great Glen Way towards the centre of Fort Augustus.</p>	<p>development also. It is not currently anticipated that Free Church Road or the Great Glen Way would be utilised for access.</p>
	<p>The intended location of site compounds / offices, material stores, loading and unloading areas, workforce parking areas and the routes connecting them to the public road network should be clearly identified in any submission made. The submission should also define the private off-road access routes that'll be used to access the site, clearly defining which routes are intended to be left in-place and which will be removed when no longer required. The finished form of any routes being left in-place should be clarified, with justification why they will be needed in that form going forward.</p>	<p>The planning application will include the noted details and define any private off-road access routes (temporary and permanent) to be used for construction, with any permanent routes detailed and justified.</p>
	<p>THC would expect any permission to include a requirement for the Promoters to enter into a formal 'wear and tear' agreement with THC as the Local Roads Authority, as set out by Section 96 of the Roads (Scotland) Act 1984. This is to ensure that THC is protected from incurring any extraordinary expenses due to possible damage inflicted on the local public roads as a direct result of the accesses arrangements implemented for this project. Such a 'wear and tear' agreement would generally include the establishment of a financial bond or some other form of financial protection, should The Council be required to directly fund repairs resulting from these works.</p>	<p>Noted. A 'wear and tear' agreement will be discussed and agreed where appropriate with THC.</p>
	<p>The submission suggests that the proposed line may be undergrounded on the approach into the substation, which would involve running the cable(s) below the U1663 Auchteraw local public road. This is the only vehicular access route to properties and businesses along that road. Therefore, THC would not support the road being closed to local vehicular and active travel access during those works. Any submission will need to clarify how the proposed underground cables will be installed without requiring this road to be closed to general access. The same restriction preventing the route from being closed to general access will also apply for any works required to form a new temporary access off the U1663 Auchteraw Road.</p>	<p>Noted. The installation details for a new underground cable beneath the U1663 which avoid road closure will be detailed as part of any relevant consent application. The details are still to be determined, however a method such as horizontal directional drilling would allow for installation without closure of the road.</p>
	<p>Transport Scotland considers that the vehicle trips generated by the construction of the OHL is unlikely to have any perceivable impact on the trunk road network; however, it should be noted that any works associated with the crossing of the trunk road will require to be discussed and agreed with the Area Manager. THC would</p>	<p>Noted. Discussions will be carried out with the relevant Area Manager to identify construction traffic requirements and information required as part of the planning application relating to trunk roads.</p>

	<p>recommend discussions commence as soon as practicable to ensure satisfactory arrangements can be made.</p>	
	<p>THC would also note that in the event any abnormal loads are required to transport components via the trunk road network, Transport Scotland will require to be satisfied that the size of turbines proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path. A full Abnormal Loads Assessment report should be provided which identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.</p>	<p>It is highlighted that no wind turbines are proposed as part of the development; this development is for connection of the Bhlairaidh Extension Wind Farm to Fort Augustus substation only.</p> <p>An appropriate Abnormal Loads Assessment Report will be submitted if it is determined that abnormal loads will be transported for construction of the development. Swept Path Analysis will be carried out as required to identify any necessary changes to street furniture along the access route(s).</p>
	<p>The EIA Report should consider the proposal's impacts on public access following NatureScot's handbook. That assessment and the mitigation measures should inform an access management plan THC usually request of major applications and in accordance with Policy 77 of the HwLDP.</p>	<p>The EA will include identification of impacts on public rights of way and access routes. An Access Management Plan will be provided if requested by THC.</p>
	<p>There are core paths and public rights of way along the length of the potential route. Access should be accommodated along them before, during and on completion of the development. Any disturbance to these routes must be made good within 14 days or another period agreed with the access authority under the auspices of both the Countryside (Scotland) Act 1967 and the Land Reform (Scotland) Act 2003.</p>	<p>Public access along core paths and other rights of way will be maintained through the construction period. In the event that temporary closures of any paths are required for safety reasons, alternative access will be arranged. Any disturbance of the routes will be kept to a minimum and within the agreed period.</p>
	<p>Any new or upgraded existing permanent accesses should accommodate public access with pass gates beside them - not kissing gates. The pass gates should have an internal width of at least 1.5 m. Any temporary accesses that are later subject of another application to be made permanent will also be required to accommodate public access with a pass gate. This is worth bearing in mind when negotiating with land managers.</p>	<p>Any new or upgraded permanent accesses will accommodate public access with pass gates to the required specification.</p>
	<p>The community has long held an aspiration for a new bridge and lengths of track linking Inverwick on Glenmoriston Estate and Forestry and Land Scotland's estate at Dalcataig. This will be sought from the development.</p>	<p>Noted. This will be discussed with THC.</p>
	<p>Development or land raising within any flood plain should be avoided and proposals should generally follow SEPA's Standing Advice for Flood Risk. Should any permanent infrastructure be located within close proximity to a watercourse a Flood Risk Assessment should be submitted to demonstrate that the development is not at risk from flooding and will not increase flood risk elsewhere. SEPA's Technical flood</p>	<p>Development will seek to avoid areas of flood risk, both to avoid increasing flood risk and to avoid potential damage or destabilisation of the OHL support structures. A Flood Risk Assessment will be provided in the event that any structures are located within flood risk zones and / or in close proximity to watercourse(s).</p>

	<p>risk guidance for stakeholders outlines the information require to be submitted as part of a Flood Risk Assessment.</p>	
	<p>Small watercourse crossings should be oversized and larger scale watercourse crossings should be demonstrated to be adequately designed to accommodate the 1 in 200 year flow (including an allowance for climate change and freeboard) to avoid increasing the risk of flooding, or information provided to justify smaller structures.</p>	<p>Noted. If watercourse crossings are required these details will inform the design.</p>
	<p>Wherever possible, a minimum buffer strip of 50 m should be kept free from development from the top of bank(s) of any watercourse or waterbody. Storage of materials within this area during construction is not permitted.</p>	<p>Noted. Where possible, a 50 m buffer from watercourses and water bodies will be observed.</p>
	<p>A Drainage Impact Assessment (DIA) is required. The DIA should include details relating to any existing field drains and the management of surface water drainage, which should be designed in line with general Sustainable Drainage Systems (SuDS) principles. The applicant should demonstrate, within the proposals submitted, any mitigation measures to manage the residual risk of overland flow / pluvial flooding.</p>	<p>A Drainage Impact Assessment or similar will be provided, detailing the required information and any mitigation measures to be put in place. The specific request for a DIA will be discussed / confirmed with THC.</p>
	<p>Natural flood management techniques should also be applied to reduce the rate of runoff where possible. Tracks should not act as preferential pathways for runoff and efforts should be made to retain the existing drainage network. Appropriate drainage is required to restrict runoff to pre-development rates and to minimise erosion to existing watercourses. The DIA should ensure that post development runoff rate is no greater than pre-development runoff rate (i.e. greenfield runoff) for all return periods up to the 1 in 200 year event including an allowance for climate change.</p>	<p>Noted. Natural flood management techniques will be employed, where possible, and detailed within the Drainage Impact Assessment or similar. The specific request for a DIA will be discussed / confirmed with THC.</p>
	<p>Runoff from all events up to and including the 1 in 200 year plus climate change event should be managed within the site boundary, with no flooding to critical roads or buildings, and evidence as to how this will be achieved should be included within the DIA. Refer to THC's Flood Risk and Drainage Impact: Supplementary Guidance for further detailed requirements.</p>	<p>The noted details will be included within the Drainage Impact Assessment or similar and the Supplementary Guidance on flood risk and drainage referred to. The specific request for a DIA will be discussed / confirmed with THC.</p>
	<p>THC's Historic Environment Team have stated that they are satisfied that there will be no potential significant effects from the Preferred Route.</p>	<p>Noted. Appropriate mitigation for non-designated assets along the alignment of the OHL will be set out within the EA. Monitoring of groundworks will be carried</p>

	<p>The non-designated assets identified within the Preferred Route can mostly be avoided by mitigation. Specific mitigation required is likely to include monitoring (and reinstatement where possible) of any historic banks and dykes where impacts cannot be avoided. It is not considered that monitoring of groundworks would be required along the majority of the route as the potential for buried remains to survive is considered to be low.</p>	<p>out at appropriate points along the alignment where there is greater potential for buried remains to survive.</p>
	<p>The Developer Contributions Supplementary Guidance (DCSG) was adopted in November 2018. This guidance sets out THC's approach to mitigating the impacts of development on services and infrastructure by seeking fair and realistic developer contributions to the delivery of such facilities. For this project it is likely that there will be contributions / works to offset the impact of construction traffic on the road network in addition to other mitigation as set out in this pre-application advice pack.</p>	<p>Noted. The DCSG will be reviewed and contributions / works to offset impact of construction traffic on the road network discussed with THC.</p>
Non-Statutory		
British Horse Society	<p>The British Horse Society notes that a concern for all riders, including tourists, is diminishing access to safe off-road riding. Most riding accidents happen on minor roads in the countryside. With increasing numbers of horses and riders requiring access to the countryside, more formal access to off-road riding will be a priority in areas considered of higher risk.</p>	<p>Noted. SSEN Transmission will keep the British Horse Society apprised of the development's progression through the design stages to allow them to keep local riders informed.</p>
British Telecom (BT)	<p>The proposal has been studied with respect to EMC and related problems to BT point-to-point microwave radio links. The initial conclusion is that existing BT equipment is present within the Corridor shown on Figure 1 of the Consultation Report and the development could cause interference to BT's radio network. BT requires a minimum 100 m clearance from any structures to the link path between active radio links and requests confirmation of exact locations to all reassessment using coordinate locations. These coordinates should cover the full length of the development.</p>	<p>Noted. Further consultation with BT was undertaken to identify the likely locations and heights of the angle poles along the length of the alignment, and BT subsequently confirmed that the proposed locations should not cause interference to the current or planned radio network.</p>
Cairngorms National Park Authority	<p>Cairngorms National Park Authority has no comment on this proposal at its alignment stage.</p>	<p>Noted.</p>
Forestry and Land	<p><i>SSEN Transmission carried out continual direct consultation with FLS through the alignment options stage. Below is a summary of the main points raised through meetings and correspondence, rather than a specific consultation response.</i></p>	<p>1. The design has been amended to include approximately 2 km of underground cable on the approach to Fort Augustus substation rather than the initial 500 m.</p>

<p>Scotland (FLS)</p>	<ol style="list-style-type: none"> 1. FLS request that the length of undergrounded section on the approach to Fort Augustus substation be increased from 500 m to 2 km as additional OHL in this location would require significant tree felling to widen the existing corridor. The Beauly – Denny OHL has resulted in significant wind blow issues to FLS plantations. 2. FLS request that a new OHL through the Beauly – Denny corridor be placed between the existing steel lattice OHLs to avoid further sterilisation of woodland. Should felling be required for the cable section then the western edge should be used as it would be better sheltered from the prevailing wind at the site. 3. FLS highlighted concern on introducing a third OHL within the Beauly – Denny corridor. 4. It would be preferable for the section of existing OHL between Dundreggan Dam and Torgyle Bridge to be converted to a double circuit and carry the new connection rather than construct an additional OHL through this area and require further woodland loss. If this is not possible, then a new OHL should be situated to the north side of the existing OHL to minimise impact on FLS woodland. 5. FLS suggest undergrounding the existing 33 kV OHL between Dundreggan Dam and Bhlaraidh and running the proposed OHL through the existing wayleave to minimise further woodland loss. FLS intend to remove the commercial forestry between this existing OHL and the public road and replant with native woodland due to operational difficulties experienced here. 6. The alignment passing up the west of the wind farm track is through FLS forestry which is part of the 5 / 10 year felling plan and thus acceptable to FLS. 7. FLS will seek a 5-year wind blow clause in any agreement. 8. FLS have indicated a desire to achieve forest access from the SSE Renewables-owned quarry track west of Bhlaraidh to improve future forestry management, as well as the wind farm track further north towards Bhlaraidh Wind Farm. 	<ol style="list-style-type: none"> 2. The new OHL has been placed between the existing Beauly – Denny OHLs as far as is safe to do so (with the final engineering design to confirm where the new connection will need to move outwith the existing OHLs), and the cable section would travel down the west side after this point. 3. [The EA will undertake a landscape and visual assessment, including a cumulative assessment to assess the level of anticipated impact of introducing further infrastructure into the existing Beauly Denny corridor]. 4. The double circuit option has been explored; a temporary OHL would have to be established while rebuilding the existing steel lattice line to accommodate a second circuit which would require an equivalent area of felling as building a new OHL. It would also likely require larger support structures, increasing landscape and visual impacts. Building the new OHL to the north of the existing OHL is less preferable due to being placed close to the edge of the River Moriston, which is an SAC designated for Atlantic salmon and freshwater pearl mussel, the latter of which is very sensitive to pollution. Construction closer to the water is more likely to result in sediment release to the water and an increased risk associated with pollution incidents. It would also require removal of most (if not all) of the woodland block along the south bank of the river, increasing landscape and visual effects. 5. Initial design of the Preferred Alignment included undergrounding of the existing 33kV OHL, as suggested; however, due to technical constraints this has since proven to be an unfeasible option. As such, the alignment has been moved slightly further north to run parallel to the existing 33kV OHL, making use of as much of the existing wayleave as is safe to do so while observing required separation distances between active electrical connections. This will require an expansion of the wayleave to the north and associated loss of woodland, but less than would be required for an entirely new wayleave. This will be assessed further to determine whether a narrower separation is safe and practicable to further reduce felling requirements.
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		<p>6. Noted.</p> <p>7. Noted.</p> <p>8. Noted. This will be raised with SSE Renewables as the owner of the quarry and access tracks. SSEN Transmission has no involvement in facilitating this request.</p>
Highlands and Islands Airports Limited (HIAL)	This would not impact the safeguarding criteria for Inverness Airport.	Noted.
John Muir Trust	Protecting native woodland, as part of protecting wild places, is something that the John Muir Trust supports and therefore also support SSEN Transmission's reasoning in reaching the preferred alignment.	Noted.
	The John Muir Trust also comment on the significance of connected habitats and would welcome future surveys and habitat management plans to consider ways to make sure the woodland habitats along the preferred alignment can remain connected or not become fragmented.	Sensitive habitats, including woodland, will be retained where possible, with the final alignment proposed as part of the application for consent selected to minimise woodland loss.
	John Muir Trust welcome SSEN Transmission's biodiversity net gain commitments and would welcome an assurance about a plan for ensuring no net loss of native woodland and, particularly, the native Caledonian woodland, identified in sections of the route. If there are opportunities to work with Forestry and Land Scotland to achieve net gain then John Muir Trust strongly encourage SSEN Transmission to take these opportunities in advance of the 2025 commitment for all infrastructure projects to achieve net gain.	SSEN Transmission has maintained direct communications with FLS throughout the route and alignment selection process in order to identify options with the least impact on woodland, on balance with other factors. The BNG assessment will include proposals for habitat creation and aim to achieve a net gain in biodiversity, if practicable.
	<p>The John Muir Trust suggests that incorporating an underground section near Bhlairaidh Wind Farm in addition to undergrounding the line near Fort Augustus would be beneficial.</p> <p>This is as underground cables can help reduce landscape and visual impacts. John Muir Trust suggest it would be helpful to understand why underground cable for the very first section has been ruled out in the preferred alignment if it has.</p>	Use of underground cabling has been considered through the routing and alignment option stages, resulting in the last 2 km (approximate) to Fort Augustus substation being undergrounded to mitigate potential significant forestry and visual impacts. Further information is now known about the potential impact at this site of the turbine 'wake effect' and it is not possible to achieve an OHL alignment that does not encroach on the three rotor diameter clearance. As a result, since the Consultation Document was issued, the alignment approach to the Bhlairaidh Extension Wind Farm on-site substation has been changed to be UGC as well.

Joint Radio Company (JRC)	Requested the individual positions and heights of each pole to check they would be clear of any links in the vicinity, along with a map of pole locations.	A response was issued to JRC identifying the likely locations and heights of angle poles / towers along the alignment.
NATS Safeguarding	<p>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.</p> <p>However, please be aware that this response applies specifically to this consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.</p>	Noted. NERL will be consulted further as the development design progresses.
Royal Society for the Protection of Birds (RSPB)	<p>As no further bird information from surveys or desk-based studies have been provided at this stage (particularly in relation to osprey, hen harrier and other schedule 1 raptors and black grouse). RSPB is unable to provide any comments on the alignment options.</p> <p>RSPB Scotland holds some recent data on the area particularly for black grouse and can provide this via a data request to help inform breeding bird surveys. There are several leks that are likely to be within disturbance distance of the works.</p> <p>RSPB note that no further detail on compensatory planting of native woodland has been provided at this stage.</p> <p>Previous comments that there may be a loss of native woodland therefore still stand. RSPB note that any losses should be minimised, and connectivity should be maintained wherever possible, particularly for the protected species that depend on this habitat. There may be options for compensatory planning elsewhere within the FLS boundary or on Dundreggan.</p>	<p>Data on bird species present in the vicinity of the development will be sought from RSPB. Grouse lek locations have been identified from previous studies undertaken as part of the Bhlaraidh Extension Wind Farm, however this data will be supplemented with up-to-date records and survey work as required.</p> <p>Loss of woodland will be minimised as far as practicable. Effects of habitat loss on protected species will be fully assessed for the preferred alignment. Opportunities for compensatory planting will be explored once the extent and areas of woodland loss are known for the final alignment, which will be identified as part of the EA stage.</p>
Sustrans	Sustrans note that the alignment and area of the Project does not appear to impact the accessibility of the National Cycle Network Route 78 (also known as The Caledonia Way). However, Sustrans would be looking for assurance from SSEN Transmission that this is definitely the case, and to be advised of any anticipated	Cycle Network Route 78 travels along the Caledonian Canal, through Fort Augustus and then east along the B862, situated approximately 1.3 km from the Preferred Alignment at the nearest point. Any disruption to users of this route would be limited to the construction stage, with some construction traffic

	<p>disruptions to access that might be caused by construction traffic or road diversions as a result of the development so they can publicise this to route users and ensure any necessary signage or diversions are in place.</p> <p>If there are any plans for an access management plan or stakeholder group in relation to outdoor access in the area, Sustrans would be grateful to be informed.</p>	<p>likely to pass through Fort Augustus to reach the sections near Auchterawe and through the Beauly – Denny Corridor. A Construction Traffic Management Plan would accompany the planning application to identify traffic management and signage measures to minimise disruption to road users within Fort Augustus, including the short section of the A82 crossed by the Cycle Network Route in question. SSEN Transmission will inform Sustrans of the proposed management plan.</p>
<p>The Coal Authority</p>	<p>The site location plan has been reviewed against the information held by the Coal Authority and it is confirmed that the project site is located outside of the defined coalfield. Accordingly, the Coal Authority has no specific comments / observations to make.</p>	<p>Noted.</p>
<p>Transport Scotland</p>	<p>Comments raised previously as part of Routeing stage consultation still stand given the proximity of the Preferred Alignment to the A887 for a significant distance. Further points are provided as per the below; SSEN Transmission proposals will be required to demonstrate to the satisfaction of Transport Scotland that all measures have been taken to ensure that:</p> <ol style="list-style-type: none"> 1. A method statement which demonstrates that felled trees will not break free and travel down the hillside to the trunk road below during establishment of a route for the 132 kV line through the hillside. The tree felling method statements on the hillside above the trunk road will require to be submitted to Transport Scotland for consideration. 2. That any construction of haul roads / permanent tracks and all works to install the wooden pole trident to carry the 132 kV cable should not cause debris / scree to be dislodged from the hillside during its construction and to enter the trunk road. If it is considered that such works present a hazard of debris / boulders falling onto the trunk road then SSEN Transmission may require to construct a catch fence to protect travellers on the A887 below. In this regard a geotechnical assessment of the hillside in advance of the works will be required. 3. Should the 132 kV wood pole trident be within 5 metres of the A887, it is very likely that SSEN Transmission will require to provide, at its own expense, Vehicle Restraint System (VRS) for road safety reasons in the event of a vehicle on the A887 leaving the road and striking the wooden pole trident. 	<ol style="list-style-type: none"> 1. Appropriate good working practices and failsafe measures will be implemented to ensure all tree felling is carried out in a controlled manner and trees are secured at the felling site. Transport Scotland will be consulted on these measures prior to any works taking place and method statement(s) issued as required. 2. All tracks associated with the development will be designed and constructed so as to prevent dislodging of debris which could affect the trunk road. Consultation with Transport Scotland will continue through the development design process to determine requirements for geotechnical assessments and / or catch fencing to protect the trunk road. 3. Trident wood poles will be set back from the road wherever possible; however, in the event that any poles are situated within 5 m of the A887 VRS will be explored in consultation with Transport Scotland. 4. SSEN Transmission will look for opportunities to carry out construction works near the A887 outwith the months noted, or otherwise implement mitigation methods to minimise disruption to road users.

	4. The A887 is extremely busy with tourist traffic each summer. As such, Transport Scotland would prefer that on-site construction works on or near the A887 are not carried out during the months of July and August.	
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6. COMMUNITY AND LANDOWNER RESPONSES

6.1 Public Exhibition Responses

6.1.1 Feedback received from the local community and general public in response to the public consultation events was minimal.

6.1.2 One query was raised during the public exhibitions as to whether Transport Scotland had been involved in the alignment options consultation process. It was confirmed that Transport Scotland had been invited to comment on the Consultation Report. Further email correspondence was received as representation from Transport Scotland to raise the comments outlined in **Table 5.1**.

6.2 Landowner Consultation

6.2.1 Direct consultation has been undertaken with the affected landowners along the alignment, specifically FLS and the Glenmoriston Estate. The former's comments have been set out within **Table 5.1**. Comments from the Estate and subsequent responses are set out in **Table 6.1**.

Table 6.1: Glenmoriston Estate Consultation Comments

Feedback Comments	Response by SSEN Transmission
<p>There is a preference to replace the existing OHL between Torgyle Bridge and Dundreggan Dam with a double circuit connection rather than construct a new OHL. If this is not possible, then a new OHL should be constructed on the north side of the existing OHL rather than the south.</p>	<p>As noted earlier in Table 5.1, the double circuit option has been explored; a temporary OHL would have to be established while rebuilding the existing steel lattice line to accommodate a second circuit which would require an equivalent area of felling as building a new OHL. It would also likely require larger support structures, increasing landscape and visual impacts. Building the new OHL to the north of the existing OHL is less preferable due to being placed close to the edge of the River Moriston, which is an SAC designated for Atlantic salmon and freshwater pearl mussel, the latter of which is very sensitive to pollution. Construction closer to the water is more likely to result in sediment release to the water and an increased risk associated with pollution incidents. It would also require removal of most (if not all) of the woodland block along the south bank of the river, increasing landscape and visual effects.</p>
<p>The Estate have no preference in regard to the specific crossing point of the River Moriston.</p>	<p>Noted.</p>
<p>The alignment being situated to the west of the wind farm access track would avoid the area recently planted to the east side.</p>	<p>Noted. Any amendments to the alignment will seek to avoid or minimise encroachment on this area of new planting.</p>

7. PROJECT RESPONSES TO CONSULTATIONS

7.1 Overview

7.1.1 This part of the Report summarises how the project has responded to the consultation responses arising from the Preferred Alignment set out within the Bhlaraidh Extension Wind Farm Grid Connection Consultation Document – Alignment Options. Responses to each of the points raised by stakeholders through the consultation process are included in Sections 5 and 6 above.

7.1.2 The consultation process for the project thus far has raised a number of comments seeking clarification or setting requirements for the development. These points include:

- inclusion of electric vehicle charging point facilities;
- for tree felling through the Glen to not be highly visible from public roads;
- for visualisation locations to be agreed with THC at Scoping stage;
- for the alignment to make best use of previously disturbed ground;
- justification for the 100 m LoD and to identify where this should be curtailed to avoid potential impacts on sensitive areas;
- that the U1663 at Auchterawe must remain open for use during installation of UGC at the crossing point;
- a new bridge and tracks will be sought between Inverwick and Dalcataig for the community in that area;
- 50 m separation distances from water courses and bodies is to be observed for all poles / structures;
- compensatory planting plans are to be provided;
- a Vehicle Restraint System (VRS) will be required for any poles within 5 m of the A887; and
- construction works near the A887 are to be avoided within July or August of any year.

7.1.3 A number of requests for further details to be submitted with the planning application or discussed with the local planning authority have also been raised, as per the following:

- sediment management protocols;
- Sustainable Design Statement;
- a financial guarantee for the removal of redundant infrastructure at the end of the development's lifespan;
- Design and Access Statement;
- Framework Construction Traffic Management Plan;
- a 'wear and tear' agreement with THC for any damage or degradation of public roads as a result of construction traffic;
- discuss works crossing any trunk roads with the relevant THC Area Manager;
- Drainage Impact Assessment;
- review of THC's DCSG and discussion with the Council on appropriate agreement(s) to be put in place;
- a 5-year wind blow clause to be discussed with FLS;
- confirmation for Sustrans that Cycle Network Route 78 will not be impacted by the development; and
- Felling Method Statement for Transport Scotland.

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

- Potential for inclusion of electric vehicle charging points will be explored, along with new tracks and bridge between Inverwick and Dalcataig.

- Felling requirements will be outlined and planned to minimise visual impacts on roadways, where practicable. This will inform compensatory planting requirements and an approach outlined for locations or methods for such planting.
- Further consultation will be carried out with THC in regard to visualisation locations and LoD requirements.
- Works and VRS relating to the A887 will be discussed with Transport Scotland.
- Pole locations will be selected so as to observe the greatest practicable separation from watercourses and water bodies.
- The requested further details and statements will be discussed with the relevant parties and included with the planning application, where appropriate.

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

8. CONCLUSIONS AND NEXT STEPS

8.1 Conclusion

- 8.1.1 The proposed Bhlaraidh Extension wind farm requires connection to the electricity transmission network at Fort Augustus 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 Bhlaraidh Extension Wind Farm on-site substation and Fort Augustus substation. It is anticipated that the connection into the Bhlaraidh Extension Wind Farm on-site substation and Fort Augustus substation would be by approximately 3 km and 2 km of UGC respectively.
- 8.1.2 This Report on Consultation documents the consultation process which has been undertaken for the project between June and August 2021. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the preferred alignment 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 confirmed that the Preferred Alignment as set out within the Alignment Consultation Document with the approach to Bhlaraidh Extension Wind Farm on-site substation change to UGC, following the existing and proposed wind farm tracks, should be taken forward as the Proposed Alignment into Stage 4: EA and consenting. The alignment was selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors.

8.2 Next Steps

- 8.2.1 The project will now be taken into Stage 4 (EA and consenting). Should further site and desk-based analysis at the EA and Consenting stage identify a particular constraint, a further review of the Proposed Alignment may be required.

APPENDIX 1: STATUTORY AND NON-STATUTORY CONSULTATION RESPONSES RECEIVED AT ROUTEING STAGE

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Statutory		
Energy Consents Unit (ECU)	We would expect SHE Transmission to follow best practice given by “Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments”. This document also applies to overhead lines, where peat is involved. If it is decided that the guidance is not to be followed, or that a PLHRA is unnecessary, SHE Transmission should provide an evidenced justification why that is the case.	A PLHRA will be carried out for the preferred alignment, in line with the noted guidance.
	SHE Transmission should investigate whether public or private water supplies are in the area and could potentially be impacted by the development. If so, mitigation measures should be described in the application.	An initial desk-based investigation into the presence of private water supplies was undertaken as part of the route options assessment. A number were located at points along the route options, such as at Dundreggan and near Fort Augustus substation, however the results only indicate end-use of private water supplies, rather than sources. The presence of private water supplies will be fully investigated for the preferred alignment, and mitigation measures proposed, where required.
Historic Environment Scotland (HES)	We are content with the selection of Route Option 1A as the preferred route for the overhead line. While we note that this route is located in the vicinity of heritage assets such as the category A listed Torgoyle Bridge (LB14996), we are content that impacts will not be significant.	Noted.
	We have identified some issues with the other route options under consideration. In particular, route options 2 and 2A have the potential to affect the Cherry Island, Crannog, Inchnacardoch Bay, Loch Ness Scheduled Monument (Index no. 9762) and its setting. Route Option 2A overlaps with this scheduled monument and there may be some potential for direct impacts. Additionally, route options 2 and 2A may give rise to impacts on the setting of the Category A listed Invermoriston, Home Farm and Former Barn to Rear (LB15021) caused by the appearance of overhead line infrastructure in westward views towards the building across Loch Ness.	The concerns in relation to route options 2 and 2A are noted. These two route options were identified as having numerous environmental and engineering constraints to development early in the options assessment, with Route Option 2A being the least preferred of all options. Alignments within route options 2 and 2A will not be explored for this development.

	<p>A new Historic Environment Policy for Scotland (HEPS, 2019) was adopted on the 1st May 2019, which replaces the Historic Environment Scotland Policy Statement (HESPS, 2016). The new Historic Environment Policy for Scotland is a strategic policy document for the whole of the historic environment and is underpinned by detailed policy and guidance. This includes our Managing Change in the Historic Environment Guidance Notes.</p>	<p>The updated Historic Environment Policy is noted and will be referenced as part of the cultural heritage assessment for the preferred alignment.</p>
NatureScot	<p>SHE Transmission have correctly identified the River Moriston Special Area of Conservation (SAC) and Levishie Wood Site of Special Scientific Interest (SSSI) as key constraints within our remit. Other key issues for us include the impact on peatland habitat, Geological Conservation Review (GCR) sites, and impacts on protected species. These have been identified (where possible at this stage) in the information provided.</p>	<p>Noted.</p>
	<p>We are unclear as to the decision making preferring 1A over 1. There is clearly a benefit to utilising the existing transmission corridor as much as possible, and certainly 1 & 1A seem the more preferable options in relation to our remit (without any protected species survey information at this point).</p>	<p>As set out within the Consultation Document, Route Option 1A is considered to be a marginal preference over Route Option 1. Use of the existing transmission corridor was a consideration in this decision; however, the need to expand the existing wayleave into native woodland and core Caledonian Pine woodland areas was considered less favourable than a potentially shorter length of native woodland felling which would result from Route Option 1A. Route Option 1A was also considered to be slightly more preferable than Route Option 1 from an engineering standpoint, specifically in relation to road crossing and angle tower requirements.</p> <p>However, as noted in response to FLS' comments and later in this Report, Route Option 1 will form a secondary option for consideration of alignment options.</p>
Scottish Environment Protection Agency (SEPA)	<p>Based on the information submitted to us we consider that, with respect to interests relevant to our remit, the proposed development will be unlikely to have a significant effect (in the context of the Regulations) on the environment. This is on the assumption that modest or plainly and easily achievable environmental mitigation measures will be put in place, including ensuring that impacts on peat, wetlands and the water environment are avoided where possible and mitigated where necessary.</p>	<p>Noted. Assessment of likely impacts of the development on peat, wetlands and the water environment will be carried out and appropriate mitigation measures proposed to ensure no significant environmental impacts are likely to occur.</p>

	<p>General Overview</p> <ol style="list-style-type: none"> 1. Five route options have been considered and the preferred option is Route Option 1A. Based on the information provided there is no obvious route that would have a significantly lower environmental impact and we are therefore content with the preferred route proposed. 2. We note that the final 500 m (approximately) into Fort Augustus substation would be underground cable. Where feasible, cabling should be laid in areas of previously disturbed ground, and it should be ensured that any trenches do not become preferential flow pathways. 3. Full layout details of the construction works should be submitted at a scale which allows the detail to be understood. The working corridor should be shown on a plan, accompanied by all associated construction works including access routes, laydown areas and construction compounds. We would request that existing tracks be utilised as much as possible. 4. We presume that no borrow pits are required but if this is not the case then please consult us further and we can provide advice on this aspect. 5. 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, the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of Ecological Clerks of Works (ECOWs), how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. 	<ol style="list-style-type: none"> 1. Noted. 2. As suggested, cabling will be directed through previously disturbed ground, where practicable, and measures put in place to prevent cable trenches from becoming preferential pathways for water. 3. Figures will be provided at sufficient scale to display the noted details. Use of existing access tracks is preferred to creation of new tracks and would be utilised as far as practicable. 4. At this stage, no borrow pits have been identified for use in the development. Consultation will be carried out with SEPA for use of any borrow pits identified as the project progresses. 5. A Schedule of Mitigation will be provided.
	<p>Peatlands and Wetlands</p> <ol style="list-style-type: none"> 1. Figures provided with the Consultation Document indicate that the preferred route passes through some areas of blanket bog / wetlands which could have an impact on sensitive environmental receptors including peat and Groundwater Dependent Terrestrial Ecosystems (GWDTE). GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. A map demonstrating that all GWDTE are 	<ol style="list-style-type: none"> 1. All GWDTE in the vicinity of the development will be mapped and identified. 2. Pole locations will be chosen so as to avoid, as far as practicable, wetland areas identified during extended Phase 1 surveys. A micrositing allowance will also be applied to permit limited movement of poles during construction to help avoid localised constraints.

	<p>outwith a 100 m radius of all excavations shallower than 1 m and outwith 250 m of all excavations deeper than 1 m must be submitted.</p> <ol style="list-style-type: none"> 2. No poles or associated construction works should be located in any wetland areas identified as part of an extended phase 1 habitat survey, which should be carried out for all un-forested areas. If this is not possible then our Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems should be followed. 3. We request that the infrastructure (including the proposed locations of all the wooden poles and access tracks etc.) are overlain on the habitat maps in order that we can accurately assess any potential impacts of the proposed works on GWDTEs. 4. In sensitive peat and wetland areas, we would welcome the use of low pressure tracked vehicles over boggy / soft grounds and for bog matting to be utilised rather than stone tracks, as they will have a lower impact on the habitats (e.g. less compaction / damage). We would also request that the trips to and from the pole locations on the sensitive habitats are kept to a minimum to reduce potential damage to the habitats. This must be clearly demonstrated on a site plan and should specifically be addressed within the Schedule of Mitigation. 5. Information should be provided on how impacts on deep peat, over 1 m depth, will be avoided, and it should be noted that areas of deep peat can still occur in forested areas. 6. The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO₂ and b) outline the preventative / mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, 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. 7. The submission must include: <ol style="list-style-type: none"> a. A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's 	<ol style="list-style-type: none"> 3. Development infrastructure will be shown on habitat maps to assist assessment of likely effects on GWDTE habitats. 4. Mitigation measures such as those suggested will be reviewed and, if practicable, implemented for the development to limit adverse effects on sensitive peat and wetland areas. 5. Mapping of peat depth will be provided with the overhead line overlain, and measures to avoid impacts outlined within the assessment itself. 6. Impacts upon peat will be assessed, and measures proposed to avoid drying or oxidation of excavated peat. 7. The requested details in relation to peat depth mapping and peat soil quantities likely to be excavated will be provided. 8. The noted guidance documents will be referenced as part of development design and assessment. 9. The requirement for a Peat Management Plan or inclusion of measures within the Schedule of Mitigation will be considered as part of the proposal.
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	<p>Guidance on Developments on Peatland - Peatland Survey (2017)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as GWDTEs.</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>8. Proposals must be in accordance with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste and our Developments on Peat and Off-Site uses of Waste Peat.</p> <p>9. Development upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation.</p>	
	<p>Watercourses and Flood Risk</p> <ol style="list-style-type: none"> 1. No poles or associated construction works should be located within a 50 m buffer of all water bodies. A map should be provided which clearly demonstrates that works, with the exception of where tracks need to cross watercourses, are outside of this buffer. 2. Due to their small footprint, development such as the poles / steel lattice towers do not usually create or increase flooding to nearby receptors in their local vicinity. Any risk (potential damage) to these structures could largely be avoided through good design and appropriate buffer zones. 3. New temporary access tracks, any workers accommodation bases and construction compounds / lay down areas should comply with Appendix 2 of SEPA's Standing Advice with regards to flood risk. 4. We presume there will be no new permanent watercourse crossings. Proposals for temporary crossings should be outlined. 	<ol style="list-style-type: none"> 1. Appropriate buffers will be applied to watercourses, and all works will be suitably presented on figures to demonstrate this. 2. Appropriate buffers and good design practices will be implemented to limit potential flooding impacts. 3. The noted guidance will be accorded with. 4. At this stage, no new permanent watercourse crossings are anticipated; however, any requirements for such will be outlined as part of the full environmental assessment. 5. Watercourse crossings will be designed to accommodate a 1 in 200 year flow.

	<p>5. Watercourse crossings should be designed to accommodate the 1 in 200 year flow, or information provided to justify smaller structures.</p>	
	<p>Forested Areas</p> <ol style="list-style-type: none"> 1. As part of the preferred route crosses forested areas, we will require reassurance that any felled timber will be removed from site and not left as waste and avoids large scale felling as this can result in a peak in release of nutrients that can affect local water quality. Proposals to make use of any waste wood on the site should comply with our SEPA Guidance: Management of Forestry Waste and there must be a clear beneficial use identified for any material left on site. 2. Tree felling proposals should be shown to meet the requirements of Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS. 	<ol style="list-style-type: none"> 1. Forestry removal will be kept to a minimum, where it cannot be avoided, in order to reduce impacts on forestry interests. The preference will be to remove any felled timber from site; however, any timber left as waste will comply with the noted guidance. 2. Tree felling proposals will accord with the noted guidance.
	<p>Existing Groundwater Abstractions</p> <ol style="list-style-type: none"> 1. We note private water supplies have already been identified. The submission must include: <ol style="list-style-type: none"> a. A map demonstrating that all existing groundwater abstractions are outwith a 100 m radius of all excavations shallower than 1 m and outwith 250 m of all excavations deeper than 1 m 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 the minimum buffers above cannot be achieved, a detailed site specific qualitative and / or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected. 2. Refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice on the minimum information we require to be submitted. 	<ol style="list-style-type: none"> 1. Figures will be provided displaying all groundwater abstraction in the vicinity of the development, and a risk assessment will be carried out if the noted buffers cannot be achieved. 2. The noted guidance will be referred to as part of development design and assessment.

The Highland Council (THC)	The appraisal contained within the supporting document identifies a number of constraints in terms of environment and infrastructure which appear to require further refinement in relation to the routing and design.	Further assessment of constraints will be carried out at Stage 3 (Alignment Selection) as the development design is refined from broad route options to narrower alignment options.
	The area is particularly sensitive given the large number of tourists and recreational users of the outdoors who move through the area and the location is sensitive to change as a result of the expansive views up and down as well as across the Great Glen. The views from south Loch Ness will be particularly important given the potential use of NeSTs and steel lattice towers. The impact of permanent tracks in elevated positions is of concern.	The visual sensitivity of the area in the vicinity of the development site, including potential impacts on tourists and users of recreational sites such as the Great Glen Way, is a key consideration which will be explored further at Stage 3 (Alignment Selection) and assessed fully for the preferred alignment. Installation of new permanent tracks would be minimised where practicable as part of development.
	Construction impacts, inclusive of impact on the local road network, will require robust assessment due to the fragile nature of the local road network.	Construction impacts on the local road network will be fully considered and assessed as the project progresses.
Non-Statutory		
British Horse Society	Horses are important and good for people so their safety and capacity to access safe off-road hacking is a key consideration in terms of their welfare and the wellbeing of their riders. We will advise local riders and carriage drivers to be aware of the proposed works and to take precautions to ensure their safety and the safety of others.	Noted. SHE Transmission will keep the British Horse Society apprised of the development's progression through the design stages to allow them to keep local riders informed.
	Horses can be frightened by large machinery so as part of your duty of care towards the general public, take heed of The British Horse Society Guidance for Drivers of Large Vehicles during the construction phase.	The guidance provided with the consultation response is acknowledged and the key points will be communicated to drivers of construction vehicles prior to works commencing.
British Telecom (BT)	The proposal has been studied with respect to EMC and related problems to BT point-to-point microwave radio links. The initial conclusion is that route options will affect our current planned and existing radio links. To further investigate, please supply the coordinates of the route options such that distances can be mitigated accurately and a response confirmed.	Noted. Further consultation with BT will be undertaken at the alignment options stage once indicative pole locations can be provided to understand potential impacts on BT assets and interests.
Cairngorms National Park Authority	We have no comments on the proposed Bhlairaidh Extension Wind Farm Grid Connection.	Noted.
Crown Estate Scotland	This proposal does not affect the assets of Crown Estate Scotland, and we therefore have no comments to make.	Noted.

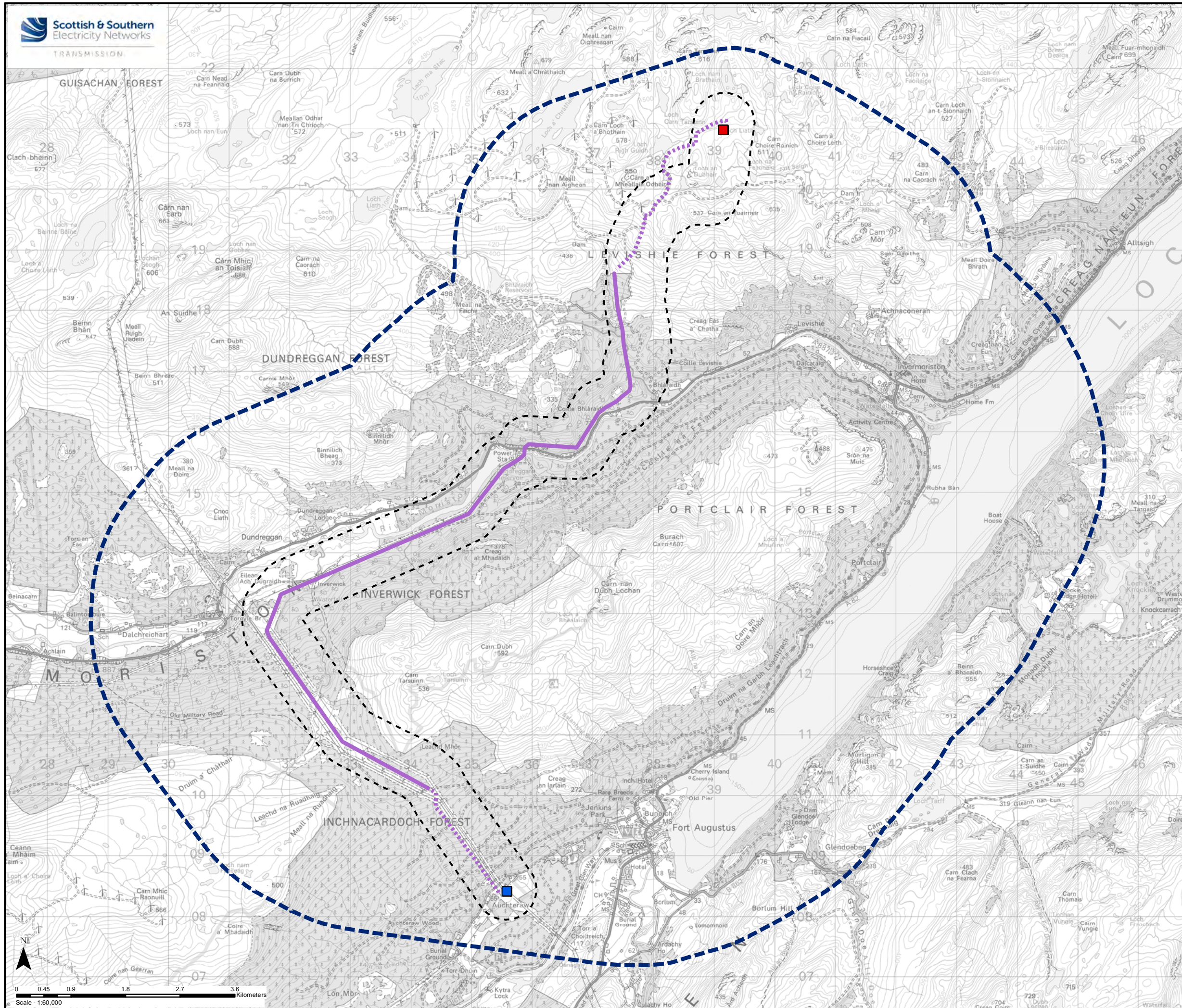
<p>Defence Infrastructure Organisation</p>	<p>To assess the proposal we will need the height of the poles and grid references.</p>	<p>Locations and heights of support structures for the overhead line are not known at this stage. Defence Infrastructure Organisation will be consulted further during the alignment options appraisal, when indicative locations and heights can be provided.</p>
<p>Forestry and Land Scotland (FLS)</p>	<p>FLS are keen to support SSE projects and work in partnership, while facing challenges on a range of objectives. The following points are key for achieving this balance:</p> <ul style="list-style-type: none"> • The current line is underground from the quarry to the dam (part of Route Option 1), and we would prefer the same approach to be adopted for this project. • Route Option 1A would cut through a core Caledonian pine wood remnant. • Route Option 2, it is understood, has been discounted. • Route Option 3 would have a highly significant landscape and environmental impact in a highly visible area where we are working to restore and expand native woodland habitat. This includes a nationally important Caledonian pinewood remnant that currently has wayleaves on two sides. • Route Option 3 would also introduce a new set of operational constraints for our activities and would result in avoidable deforestation. • Route Option 1 - the use of existing wayleaves offers a range of benefits: <ul style="list-style-type: none"> ○ Limited additional visual impact with the impact being concentrated in the existing wirescape; ○ No further impact on native woodland habitat; ○ No additional operational constraints; and ○ No further deforestation. <p>In light of the above points, we do not support route options 1A or 3 as options and see the use of existing wayleaves in Route Option 1 as a pragmatic solution that minimises impact across a wide range of issues.</p>	<p>SHE Transmission are committed to working closely with FLS, and note the key points raised.</p> <p>SSE would clarify that use of Route Option 1 would still require tree felling, as the current wayleaves would require expansion to accommodate the new overhead line. This would result in removal of native woodland and core Caledonian pine wood areas. Consequently, Route Option 1A was determined to be preferable over Route Option 1 in forestry terms, as there appears to be greater opportunity to avoid Caledonian pine wood and reduce the length of native woodland the overhead line would pass through.</p> <p>Further consultation is being undertaken with FLS. In recognition of the points raised by FLS, it is proposed that Route Option 1 is carried forward as a secondary option to ensure that the consideration of alignment options in both routes 1 and 1A be considered further during the alignment selection stage of the project. Both the preferred and secondary options are shown on Figure 1.</p>

Joint Radio Company (JRC)	Requested the individual positions for each pylon to check against the system to ensure it's clear of any links in the vicinity.	A response was issued to JRC to note that positions are not known at this time, and a map of JRC links was requested.
NATS Safeguarding	<p>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.</p> <p>However, please be aware that this response applies specifically to this consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.</p>	Noted. NERL will be consulted further as the development design progresses.
Royal Society for the Protection of Birds (RSPB)	Requested a copy of Confidential Figure 4.	SHE Transmission provided the requested figure on 10 th November 2020.
	RSPB Scotland holds some recent data on the area particularly for black grouse and can provide this via a data request to help inform breeding bird surveys. There are several leks that are likely to be within disturbance distance of the works.	Data on bird species present in the vicinity of the development will be sought from RSPB. Grouse lek locations have been identified from previous studies undertaken as part of the Bhlaraidh Extension Wind Farm, however this data will be supplemented with up to date records and survey work as required.
	Careful timing of works including helicopter use will need to be planned to avoid disturbance to the nesting osprey. Our records show that there is a hen harrier territory in the area, it is probably beyond recognised disturbance distances but may be susceptible to helicopter disturbance. A data request to Highland raptor study group will provide up to date information on breeding raptors and FLS may also hold data.	Potential for use of helicopters to aid construction in challenging areas will be explored as the project progresses, and suitable mitigation measures employed to avoid or minimise disturbance to sensitive bird species in the area. The Highland Raptor Study Group will be contacted for further information.
	NatureScot will be able to provide more specific advice regarding the Special Area of Conservation.	Noted. Advice from NatureScot is being sought throughout all project stages.






	RSPB note that there may be a loss of native woodland. Any losses should be minimised, and connectivity should be maintained wherever possible, particularly for the protected species that depend on this habitat. There may be options for compensatory planning elsewhere within the FLS boundary or on Dundreggan.	Loss of woodland will be minimised as far as practicable. Effects of habitat loss on protected species will be fully assessed for the preferred alignment. Opportunities for compensatory planting will be explored.
Scottish Forestry	The Scottish Government's Control of Woodland Removal Policy (CoWRP) includes a strong presumption in favour of protecting Scotland's woodland resources. Woodland removal to accommodate development should be allowed only where it would achieve significant and clearly defined additional public benefits, and compensatory planting proposals designed to mitigate impact of any proposal should form part of the development proposals.	The purpose of the development is to connect a wind farm to the National Grid for production of renewable energy, which is considered to be in the public interest by contributing to current national Climate Change targets. The design of the development will seek to minimise felling requirements by avoiding standing trees, where practicable. Compensatory planting requirements will be determined following finalisation of the alignment and associated working corridor / wayleave.
	All five routes described in the consultation document have potential to significantly impact on the forest environment, both in terms of woodland loss and impact on future forest management. From Scottish Forestry's perspective, Route Option 3 is the preferred one, as it would involve relatively small areas of woodland removal in comparison with the other routes. It also appears to have lesser potential impact on woodland listed on the Native Woodland Survey of Scotland.	The Environmental Route Options assessment also identified Route Option 3 as likely to have the least potential impact on forestry interests. Route Option 1A was selected as the overall preferred route on balance, and was considered to have the least potential for forestry impact after Route Option 3.
	The CoWRP requires compensatory planting corresponding with the areas of permanent woodland loss associated with the development. The developer needs to be aware that compensatory planting might be subject to the Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017.	Noted.
Scottish Water	Scottish Water has no objection to the planning application; however, this does not indicate that the proposed development can be serviced. The development may impact on Scottish Water assets, and the applicant should identify any potential conflicts with these assets through direct contact with the Asset Impact Team. The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction.	Scottish Water assets in proximity to the development will be identified through consultation with the Asset Impact Team. Any identified assets will be reported on as part of the final application for consent.
	A review of our records indicates that the proposed activity is within a drinking water catchment area where a Scottish Water abstraction is located. It is a relatively large catchment and the activity is sufficient distance from the intake	Noted. Appropriate mitigation measures, including best practice working methods, will be utilised for the development.

	<p>that it is likely to be low risk. Please note that site specific risks and mitigation measures will require to be assessed and implemented.</p> <p>We welcome that reference has been made to the Scottish Water drinking water catchment, and this fact should be noted in future documentation. Anyone working on site should be made aware of this during site inductions.</p>	
ScotWays	<p>It is understood that this consultation is an early-stage route selection exercise. A preliminary look at our records shows there are routes of interest affected by the various Route Options. There may now be general access rights over any property under the terms of the Land Reform (Scotland) Act 2003. We suggest consulting Core Paths Plans, prepared by local authorities as part of their duties under this Act. In light of these points, SSE may benefit from the provision of a formal consultation response from ScotWays for the proposed development.</p>	<p>Potential impacts on routes and rights of way will be considered in greater detail through the alignment selection process and environmental assessment, and further consultation will be undertaken with ScotWays as required. Referral to Core Paths plans forms a key element in consideration of potential effects on routes and rights of way.</p>
The Coal Authority	<p>The site location plan has been reviewed against the information held by the Coal Authority and it is confirmed that the project site is located outside of the defined coalfield. Accordingly, the Coal Authority has no specific comments / observations to make.</p>	<p>Noted.</p>
Transport Scotland	<p>Whilst the preferred line has moved away from the A82, it is now very close to the A887 which is also a trunk road. When working above the trunk road, SSE will require to provide to the satisfaction of Transport Scotland that the following measures have been taken:</p> <ol style="list-style-type: none"> 1. Any tree felling operations above the trunk road required to clear a route for the overhead wood pole line will have to be carried out in a failsafe manner in that all measures necessary are taken to ensure felled trees do not break free and travel down the hillside to the trunk road below. The tree felling method statements on the hillside above the trunk road will require to be submitted to Transport Scotland for consideration. 2. Any haul roads / permanent tracks for the servicing of the overhead wood pole line that are required should not cause debris / scree to be dislodged from the hillside during its construction and to enter the trunk road. 3. The location of the overhead wood pole line in relation to the trunk road will be studied closely by Transport Scotland and in particular the steepness of the hillside and the ground conditions on the hillside. 	<ol style="list-style-type: none"> 1. Appropriate good working practices and failsafe measures will be implemented to ensure all tree felling is carried out in a controlled manner and trees are secured at the felling site. Transport Scotland will be consulted on these measures prior to any works taking place. 2. All tracks associated with the development will be designed and constructed so as to prevent dislodging of debris which could affect the trunk road. 3. The route and alignment selection study process considers the gradient of the ground as part of determining a preferred option, and seeks to avoid steeper areas. Consultation with Transport Scotland will continue through the development design process to determine requirements for geotechnical assessments and / or catch fencing to protect the trunk road.

	<p>Depending on the gradient and the ground conditions (e.g., loose scree, etc.) then there may be a need for SSE to install a temporary catch fence. In this regard a geotechnical assessment of the hillside above the trunk road may be required.</p>	
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Key

-  Corridor
-  Proposed Bhlaraidh Extension Wind Farm Substation
-  Fort Augustus
-  Preferred
-  Underground Cable (Indicative Alignment)

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Project No: LT295
Project: Bhlaraidh Extension Wind Farm Grid Connection Alignment Report on Consultation

Title: Figure 1 - Preferred Alignment

Drawn by: SK Date: 05/05/2022

Drawing: 120009-D-AROC1-1.0.0