

APPENDIX 1: STATUTORY AND NON-STATUTORY CONSULTATION RESPONSES

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.



	A new Historic Environment Policy for Scotland (HEPS, 2019) was adopted on the 1 st 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.	The updated Historic Environment Policy is noted and will be referenced as part of the cultural heritage assessment for the preferred alignment.
NatureScot	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.	Noted.
	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).	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. 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.
Scottish Environment Protection Agency (SEPA)	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.	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.



General Overview	1.	Noted.
 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.	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.
 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.	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.
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.	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. A Schedule of Mitigation will be provided.
 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.		
 Peatlands and Wetlands 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 	1.	All GWDTE in the vicinity of the development will be mapped and identified. 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.



	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.	Development infrastructure will be shown on habitat maps to assist assessment of likely effects on GWDTE
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.	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.
3.	We request that the infrastructure (including the proposed locations of all the wooden poles and access tracks etc.) are overlain on the habitat	5.	overhead line overlain, and measures to avoid impacts outlined within the assessment itself.
	maps in order that we can accurately assess any potential impacts of the proposed works on GWDTEs.	6.	Impacts upon peat will be assessed, and measures proposed to avoid drying or oxidation of excavated
4.	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	7.	The requested details in relation to peat depth mapping and peat soil quantities likely to be excavated
	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	8.	The noted guidance documents will be referenced as part of development design and assessment.
	addressed within the Schedule of Mitigation.	9.	The requirement for a Peat Management Plan or
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.		will be considered as part of the proposal.
6.	The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO_2 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:		
	 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.	
	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.	
	 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. 	
	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.	
Wat	 Atercourses and Flood Risk 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. 	 Appropriate buffers will be applied to watercourses, and all works will be suitably presented on figures to demonstrate this. Appropriate buffers and good design practices will be implemented to limit potential flooding impacts.
	 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. New temporary access tracks, any workers accommodation bases and 	 The noted guidance will be accorded with. 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.
	 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. 	 Watercourse crossings will be designed to accommodate a 1 in 200 year flow.



5	. Watercourse crossings should be designed to accommodate the 1 in 200 year flow, or information provided to justify smaller structures.	
Fores 1 2	 ted Areas 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. 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. 	 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. Tree felling proposals will accord with the noted guidance.
Existin 1 2	 ng Groundwater Abstractions We note private water supplies have already been identified. The submission must include: 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. 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. 	 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. 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 appraised 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 Bhlaraidh 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.



Defence Infrastructure Organisation	To assess the proposal we will need the height of the poles and grid references.	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.
Forestry and Land Scotland (FLS)	 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: 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: 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. 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. 	 SHE Transmission are committed to working closely with FLS, and note the key points raised. 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. 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.



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	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.	Noted. NERL will be consulted further as the development design progresses.
	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.	
Royal Society for the Protection of Birds	Requested a copy of Confidential Figure 4.	SHE Transmission provided the requested figure on 10 th November 2020.
(RSPB)	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.



	that it is likely to be low risk. Please note that site specific risks and mitigation measures will require to be assessed and implemented.	
	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.	All personnel involved with construction of the development will be notified of the presence of the drinking water catchment during site inductions.
ScotWays	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.	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.
The Coal Authority	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.	Noted.
Transport Scotland	 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: 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. 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. 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. 	 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. All tracks associated with the development will be designed and constructed so as to prevent dislodging of debris which could affect the trunk road. 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.



fence. In this regard a geotechnical assessment of the hillside above	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