

**Creag Dhubh to Inveraray 275kV
Connection
Environmental Impact Assessment
Volume 4 | Appendix 4.3**

Consultation Register

August 2022

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LIST OF ABBREVIATIONS

AC	Asbestos Cement
AEP	Annual Exceedance Probability
AGL	Glasgow Airport
APQ	Area of Panoramic Quality
ASNW	Ancient, Semi-Natural Woodland
CEMP	Construction Environmental Management Plan
CIEEM	Chartered Institute of Ecological and Environmental Management
CRM	Collision Risk Model
CTMP	Construction Traffic Management Plan
DWPA	Drinking Water Protected Areas
ECU	Energy Consents Unit
EIA	Environmental Impact Assessment
EU	European Union
FCS	Forestry Commission Scotland
GDL	Garden and Designed Landscapes
GET	Golden Eagle Topography
GPA	Glasgow Prestwick Airport
GWDTE	Ground Water Terrestrial Ecosystems
HES	Historic Environment Scotland
HRA	Habitat Risk Assessment
IEMA	Institute of Environmental Management and Assessment
IFP	Instrument Flight Procedures
LBAP	Local Biodiversity Action Plan
LDP	Local Development Plan
LEPO	Long-Established Woodlands of Plantation Origin
LVIA	Landscape and Visual Assessment
m	Metres
MCA	Marine Licensing and Consenting
MDP	Medium-Density Polyethylene
MSS	Marine Scotland Science
NS	NatureScot (Formerly SNH)
NVC	National Vegetation Classification
OC	Operational Corridor
OHL	Overhead Line
OHMP	Outline Habitat Management Plan
ONR	Office for Nuclear Regulation
PAC	Pre-Application Consultation
PDE	Pre-Development Enquiry
PLHRA	Peat Landslide Hazard Risk Assessment
PPP	Pollution Prevention Plan
PWS	Private Water Supply
RSPB	Royal Society for the Protection of Birds
RVAA	Residential Visual Amenity Assessment
RWI	Raw Water Intake
SAC	Special Areas of Conservation
SBL	Scottish Biodiversity List
SEPA	Scottish Environmental Protection Agency
SF	Scottish Forestry
SLVIA	Seascape, Landscape and Visual Assessment

SNH	Scottish Natural Heritage (Now NatureScot)
SPA	Special Protected Area
SPP	Scottish Planning Policy
SR	Scoping Report
SSEN	Scottish & Southern Electricity Networks
SUDS	Sustainable Drainage Systems
TA	Technical Appendix
TMP	Traffic Management Plan
UK BAP	United Kingdom Biodiversity Action Plan
UXO	Unexploded Ordnance
VP	Viewpoint
WLA	Wild Land Area
WLIA	Wild Land Impact Assessment
WTW	Water Treatment Works
ZTV	Zones of Theoretical Visibility

1 INTRODUCTION

- 1.1.1 Consultation and engagement with stakeholders are an important part of the Environmental Impact Assessment (EIA) process, with advice and input from key consultees being sought at the early design stages of a project, to inform decisions about the Proposed Development.
- 1.1.2 An EIA Scoping Report was issued to the Energy Consents Unit (ECU) on 16th December 2020 (see **Technical Appendix 4.1: EIA Scoping Report, EIAR Volume 4**). A Scoping Opinion was provided by ECU on 8th March 2022, and is included in **Technical Appendix 4.2: EIA Scoping Opinion (EIAR Volume 4)**. The responses, contained within the Scoping Opinion and pre-consultation, have been considered in detail during the EIA process.
- 1.1.3 This Technical Appendix provides details (**Table 1.1**) of all consultation feedback received between 2017 and 2022, as well as the Applicant's response and details of how the comments have been addressed throughout the EIA process.

Table 1.1: Consultation Register

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
ECU	Scoping Opinion	15/06/2022	All	Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisors.	Each technical chapter contains a table which addresses all matters raised through consultation. In addition, this technical appendix summarises all responses.
				Scottish Ministers are satisfied with the scope of the EIA as set out at Sections 4 – 15 of the scoping report.	Noted
			Chapter 11: Water Environment	Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.	Scottish Water Asset plans were obtained from an approved supplier. There are no assets within the 500 m buffer of the Proposed Development. In addition, the Proposed Development is not within, or within 500 m of the Cladich Drinking Water Protection Area (DWPA) or any other DWPA.
				Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.	EIAR Volume 2: Chapter 11: Water Environment contains a summary of Private Water Supplies which have the potential to be impacted by the Proposed Development. It is also supported by EIAR Volume 4: Technical Appendix 11.3: Private Water Supply Assessment .
			Chapter 11: Water Environment and Chapter 8: Ecology	In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.	The main watercourses and waterbodies in proximity to the Proposed Development are identified in EIAR Volume 3a: Figure 11.1: Surface Water Features . Designated sites, including SACs, are considered as part of the Ecology Assessment in EIAR Volume 2, Chapter 8: Ecology .
			Chapter 8: Ecology	MSS also provide standing advice for OHL developments (which has been appended at Annex B) which outlines what information, relating to freshwater and diadromous fish and fisheries, is expected in the EIA report. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process.	Noted. Freshwater habitats and fish are considered as part of the Ecology Assessment in EIAR Volume 2, Chapter 8: Ecology .
			Chapter 10: Geology and Soils	Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at http://www.gov.scot/Publications/2017/04/8868 , should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures.	Noted. A PLHRA has been undertaken, in line with the ECU Best Practice Guidance, to support the assessment (EIAR Volume 4: Technical Appendix 10.3 PLHRA).

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				The Scoping Report was referred to Ironside Farrar commissioned by the ECU to provide advice regarding PLHRA and relative to the potential for risks posed by peat slides. Scottish Ministers agree with Ironside Farrar that a PLHRA will be required. Please note Ironside Farrar's comments in their Annex A with regards to PLHRA.	Noted. A PLHRA has been undertaken to support the assessment (EIAR Volume 4: Technical Appendix 10.3 PLHRA).
			Chapter 3: Consideration of Alternatives	Ministers expect Company's to carry out adequate pre-application consultation and to demonstrate what alternatives to the proposal were considered before arriving should include a description of the main development alternatives which are relevant to the proposal and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	EIR Volume 2, Chapter 3: Consideration of Alternatives details the alternative route and alignments considered and the steps taken to reach the Proposed Development layout.
				It is noted that considerable detail has been provided at 2.1 of the Scoping Report in respect of why the original preferred route has not been progressed due to unexploded ordnance ("UXO") being discovered in Ladyfield Plantation. Ministers agree with the Planning Authority that the EIA should include the results of the community consultation exercises which have been undertaken including any views received in response to the proposed realignment from that originally proposed as part of the original community consultation exercise. It is understood that this additional community consultation exercise is currently ongoing.	EIAR Volume 2, Chapter 3: Consideration of Alternatives details the alternative route and alignment options considered. Community consultation responses in relation to the proposed alignment are summarised in EIAR Volume 4: Technical Appendix 3.2 Creag Dhubh to Inveraray 275kV Overhead Line, Alignment Report on Consultation .
			All	Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.	Noted
			Chapter 16: Schedule of Mitigation	The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.	Each technical assessment chapter within EIAR Volume 2 contains a summary table detailing the significance of potential impacts and any relevant mitigation. A Schedule of Mitigation is also provided in EIAR Volume 2: Chapter 16: Schedule of Mitigation .
			All	This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at the date of this scoping opinion. The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 37 consent for the proposed development.	Noted

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
				This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.	Noted. A list of cumulative developments considered in the technical assessments is provided in EIAR Volume 2: Chapter 15: Cumulative Effects .
				It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this.	Noted
				When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.	This appendix forms the tabular response to the issues raised in the Scoping Opinion, and each technical assessment in EIAR Volume 2 has summarised responses to the issues raised.
	Post-scoping. Consultation on cumulative list to be used in the EIAR.	20/04/2022	Chapter 15: Cumulative Effects	The ECU agree with the list provided below and that Carr Dubh windfarm and Ladyfield windfarm should also be included.	Noted, these projects have been included and provided in the cumulative projects list in EIAR Volume 2: Chapter 15: Cumulative Effects and EIAR Volume 3a: Figure 15.1: Cumulative Developments
				Please note that agreement of the cut-off date does not prevent the Scottish Ministers from seeking additional information at application stage.	Noted
				The ECU would also recommend that Creag Dhubh Substation be included as commitment was given to considering this development in a cumulative impact EIA associated with the main S37 transmission line by SSEN in previous submissions to the Planning Authority.	Noted, this project has been included and provided in the cumulative projects list in EIAR Volume 2: Chapter 15: Cumulative Effects and EIAR Volume 3a: Figure 15.1: Cumulative Developments
				The ECU also note that no connection towers between Creag Dhubh Substation and the main transmission line(s) appear to be proposed they are proposed for the four other substations where between two and eight towers are involved). Should any short connection line be required to link the substation into any section of the now two part main S37 transmission line between Dalmally and Inveraray then this too should be included in the cumulative impact assessment.	EIAR Volume 2: Chapter 2: Development Description outlines how the OHL is terminated to the gantries within Creag Dhubh via downloads from the tower.
Argyll and Bute Council	Scoping Response	09/06/2022	Chapter 3: Consideration of Alternatives	The EIA should include a description of the reasonable alternatives (in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposal and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	EIAR Volume 2: Chapter 3: Consideration of Alternatives details the alternative route and alignments considered and the steps taken to reach the Proposed Development layout.
			Consultation	The EIA should include the results of the community consultation exercises which have been undertaken at time of submission of the S37 application, including any views received in response to the proposed realignment from that originally proposed as part of the original community consultation exercise. At time of writing it is understood that this additional community consultation exercise is ongoing.	EIAR Volume 2: Chapter 3: Consideration of Alternatives details the alternative route and alignment options considered. The community consultation responses are summarised in EIAR Volume 4: Technical Appendix 3.2 Creag Dhubh to Inveraray 275kV Overhead Line, Alignment Report on Consultation and the PAC Report .

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			Chapter 8: Ecology, Chapter 10: Geology and Soils and Chapter 11: Water Environment	The EIA should identify the location of all built elements, including access tracks and any related and required borrow pits to facilitate access track provision, both temporary and permanent, which should be sited to avoid habitats of importance, wetlands, areas of deep peat and blanket bog, watercourses and abstractions, in order that areas of particular vulnerability to damage from development, or which have higher pollution sensitivity, may be protected from unnecessary impacts associated with the development.	No borrow pits have been proposed at this stage. All other elements of the Proposed Development in relation to habitats, peat, watercourses and abstractions have been identified in the supporting figures of the relevant EIAR chapters including Chapter 8: Ecology, Chapter 10: Geology and Soils and Chapter 11: Water Environment (EIAR Volume 2) .
			All	The assessment should address the construction, operational and decommissioning phases of the development.	Noted
			Chapter 2: Project Description	It should also be noted that the Council would expect the access to/from the site to the junction with the public road to be included within the site edged red.	Access tracks are from the A819 public road as shown in EIAR Volume 3a: Figure 2.1: Development Description .
			All	The following documents should also be given due weight in the policy evaluation of the proposal <ul style="list-style-type: none"> • NPF3 (or NPF4 based upon submission date) • SPP • Argyll and Bute Local Development Plan 2015 • Argyll and Bute Energy Action Plan • Argyll and Bute Landscape Wind Energy Capacity Study (Capacity Study 2017); • SNH (1996) Landscape Assessment of Argyll and the Firth of Clyde (Review No78) • Argyll and Bute Woodland and Forestry Strategy • Argyll and Bute Biodiversity Action Plan 2017 Any route option proposed as part of a S37 application should also have regard to any specific land use allocations within the adopted LPD 2015.	Noted
				Although not as yet adopted, attention is drawn to the emerging LDP 2. Depending upon the date of any future application this may have reached a stage in the adoption process where the weight to be afforded to this will be increased. Therefore the applicants should ensure that the status and weight to be afforded to the policies and land use allocations/designations in the emerging LDP 2 document are both considered, and given appropriate weight, in any policy evaluation.	Noted
			Chapter 6: SLVIA	In respect of the predicted ZTV and proposed viewpoints and the proposed 10 km radius study area of the ZTV this is considered to be acceptable.	Noted
				In respect of landscape designation as and matters to be included within the LVIA are agreed. The proposed viewpoints are also considered to be acceptable.	Noted
				In respect of the cumulative LVIA evaluation of Creag Dhubh substation and the proposed S37 from Creag Dhubh to Dalmally (Glen Orchy switch). It would also be useful to include views to the south and west from the Duncan Ban Monument within the LVIA analysis as parts of the cumulative infrastructure are likely to be visible from this popular location.	EIAR Volume 3b: Figure 6.16 provides a similar view at a closer distance to the Proposed Development.

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				Critical to the LVIA and evaluation of impacts is to ensure that cumulative impacts are properly evaluated. It has been clarified by SSEN and commitment made to both A&B council and ECU in respect of previous screening submissions for the proposed Creag Dhub Substation (Major Planning Application (REF: 22/00282/PP) and any associated linkage towers (under a separate S37 application) a cumulative LVIA evaluation will be carried out to include these future development proposals which will be subject to separate applications by SSEN.	Noted, these projects have been included and provided in the cumulative projects list in EIAR Volume 2: Chapter 15: Cumulative Effects and EIAR Volume 3a: Figure 15.1: Cumulative Developments
			Chapter 15: Cumulative Effects	A list of other developments to be considered as part of the cumulative landscape evaluation was provided to the Planning Authority under separate submission by SSEN on 1.6.22. This list is agreed as capturing those existing or likely foreseeable developments at this time. It should however be noted that there is a potential for a large pump hydro scheme at Balliemeanoch to be formally submitted during the application process and this may also require to be considered. Alan Brogan at the ECU is aware of this potential development, and will be able to clarify whether a formal submission has been made under S36 at time of the submission of this proposal.	Noted, these projects have been included and provided in the cumulative projects list in EIAR Volume 2: Chapter 15: Cumulative Effects and EIAR Volume 3a: Figure 15.1: Cumulative Developments
			Chapter 6: SLVIA	The Assessment approach and methodology that....The LVIA will identify and evaluate the likely residual effects of the Proposed Development on landscape and visual receptors within 10 km of the Proposed Development. This will be undertaken via desk study and through field reconnaissance.The effects of the Proposed Development on landscape character and on views and visual amenity would be assessed and mitigation measures, where appropriate, would be proposed to prevent, reduce, or offset any likely significant adverse effects identified. Cumulative effects from the Proposed Development in combination with other proposed developments would also be considered....is also welcomed.	Noted. This is covered in EIAR Volume 2: Chapter 6: SLVIA
			Chapter 7: Cultural Heritage	The Scoping Report notes that a considerable number of Heritage Assets have been identified. It is welcomed that additional baseline surveys will be undertaken in accordance with recognised methodology. The planning authority welcomes confirmation that: The effects of the Proposed Development (direct and indirect impacts) on heritage assets would be assessed and mitigation measures, where appropriate, would be proposed to prevent, reduce, or offset any likely significant adverse effects identified. Cumulative effects from the Proposed Development in combination with other proposed developments would also be considered, where appropriate. In respect of these matters the Planning Authority will defer to the views of HES.	Noted. The effects of the Proposed Development in heritage assets, ,mitigation measures and cumulative effects is presented in EIAR Volume 2: Chapter 7: Cultural Heritage . The list of cumulative projects assessed in the EIAR is presented in EIAR Volume 2: Chapter 15: Cumulative Effects and EIAR Volume 3a: Figure 15.1: Cumulative Developments .

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			Chapter 8: Ecology	In respect of these matters it is welcomed that the applicants have clarified that: The EclA will be completed in accordance with the Chartered Institute of Ecological and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment ³⁰ . The assessment will use the ecological baseline to identify the Important Ecological Features (IEFs) that could be affected by the construction of the Proposed Development. IEFs will be assigned a geographic level of importance based on their conservation status and population / assemblage trends and other relevant criteria (including size, naturalness, rarity and diversity). Details of the Proposed Development will then be used to assess what level of effect each receptor is likely to receive and whether that impact will be beneficial or adverse, significant or negligible, and temporary or permanent.	The assessment has been carried out in line with best practice EclA Guidelines developed by the Chartered Institute of Ecology and Environmental Management (CIEEM). Details of assessment methodology are included in EIAR Volume 4: Technical Appendix 8.1: Ecology Methodology and Results.
				The Planning Authority also welcome the stated commitment that: Where appropriate, mitigation measures will be recommended within the EclA to remedy any adverse impacts and measures to enhance the local ecology will also be incorporated. An assessment of cumulative and residual effects will also be undertaken and reported within the EIA Report.	Mitigation measures are detailed in EIAR Volume 2: Chapter 8: Ecology along with the assessment of cumulative and residual effects. Methods of assessment are detailed in EIAR Volume 4: Technical Appendix 8.1: Ecology Methodology and Results.
				It is noted that the applicants have committed to Biodiversity Net Gain objectives as part of the proposal. This is a welcomed step.	Noted
				The applicants also confirm: The NVC surveys will be completed in line with NVC survey guidelines (Rodwell, 2006ii), classifying communities in accordance with the NVC system (Rodwell, 1991 – 2000, 5 volumesiii). The purpose of these surveys is to identify protected habitats, consisting of potential GWDTEs, Annex 1 habitats under the EU Habitats Directive and those with protection under the Scottish Biodiversity List (SBL). This is considered to be satisfactory by the Planning Authority	Noted
			Chapter 8: Ecology and Chapter 9: Ornithology	All necessary surveys should be carried out at the optimum time of year by a suitably qualified person and include mitigation.	Details of survey efforts, methods and qualifications are provided within EIAR Volume 4: Technical Appendix 8.1: Ecology Methodology and Results and Technical Appendix 8.1: Ornithology Methods.
			Chapter 8: Ecology	The intention to further evaluate potential impacts upon red squirrel habitat loss, fragmentation and severance are welcomed.	Noted- addressed in EIAR Volume 2: Chapter 8: Ecology.
			Chapter 10: Geology and Soils	The commitment that....The EIA Report will include an assessment of potential effects on geological and peat resource from the construction and operation of the Proposed Development. The outcomes of the peat study will be included as a technical appendix to the EIA Report and will include a detailed map of peat depths showing all the built elements overlain to demonstrate how the development avoids areas of deep peat....is welcomed as impacts upon peat are becoming ever more material in respect of climate change and carbon storage.	Noted

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
				It is also welcomed that the applicant confirms: Peat probing will be undertaken in accordance with good practice guidance and relevant methodologies ⁵⁰ . This will include a coarse resolution grid across the Proposed Development area, based on a 100m grid (subject to access). The peat depth data will then be used to inform the design of the Proposed Development.	Noted
				This embedded mitigation approach is considered essential to ensure that impacts upon peat are minimised from the outset of the proposals and tower and access location and construction are informed by peat depth and quality.	Noted
			Chapter 8: Ecology and Chapter 11: Water Environment	The commitment that: Ecological surveying shall identify the potential presence of GWDTEs Hydrological assessment shall be carried out to determine the extent to which such habitats are dependent on groundwater supplies, and shall assess the sensitivity of habitats to alterations in groundwater flows due to construction activities. Excavations in excess of 1 m proposed for construction purposes, within 250 m areas of Moderate or High groundwater dependency, shall be subject to a qualitative/quantitative assessment of their potential impact on habitats" is welcomed	Noted
			Chapter 11: Water Environment	The commitment to undertake, if necessary further qualitative assessment of Private Water Supplies is welcomed.	EIAR Volume 4: Technical Appendix 11.3: Private Water Supply Assessment has provided a qualitative assessment of the potential impacts of the Proposed Development on PWSs.
				The overall EIA approach to Hydrology and Hydrogeology and use of technical reports as part of the EIA is welcomed. The Planning Authority will defer to the views of SEPA and Scottish Water on such matters.	Noted
			Chapter 12: Traffic and Transport	The commitment to provide a Transport and Access Assessment as part of the EIA report is welcomed.	Noted
				The Planning Authority is concerned that reasonably foreseeable additional construction projects, (many of which form part of SSEN's wider Argyll infrastructure strategy) will require to be considered even if formal permission has not been granted i.e. <ul style="list-style-type: none"> • An additional S37 proposal Dalmally to Creag Dhubh • The construction of Creag Dhubh substation platform and access(major planning application) • Four Further large substations along the Inveraray Crossaig Route. These other major infrastructure projects may to some degree overlap with the construction of the current proposals, and therefore there is a need to ensure that that any TA is robust in terms of reasonably foreseeable cumulative impacts on the roads network, and not just restricted to only those elements which have a planning or other necessary permission in place.	The Transport Assessment (Appendix 12.1, EIAR Volume 4) only considers committed developments. Adding other potential developments will dilute the traffic on the network, showing a reduced impact associated with the Proposed Development and affect mitigation. As such, the approach taken is considered to be an overly robust assessment. A Traffic Management Plan (TMP) will be provided post consent and will consider other SSEN Transmission projects under construction within the area.

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				<p>The Planning Authority is also aware of the recent submission of the S36 Application for the enlargement of Cruachan Power Station and the potential construction timing of this should be evaluated by ECU, and if necessary factored in to any EIA TA submissions for the SSEN projects. This is particularly important where borrow pits are proposed which may be utilised to provide construction materials for more than one SSEN project. Recent S37 permissions have resulted in considerable post approval work for the Area Roads Manager in respect of conditioned TMP's and the failure for the use of borrow pits to be factored into TA's at an early enough stage.</p> <p>This resulted in TMP's being produced in advance of any investigation of the use of borrow pits and work having to be done multiple times associated with the review and approval of these conditioned submissions as part of the deemed planning permission.</p> <p>In this respect the applicants are advised to have further discussions with ECU, Transport Scotland and the Area Roads Manager prior to finalising any TA submissions to ensure that other projects with potential impacts on the roads network are understood and properly addressed, as well as ensuring that the potential use of borrow pits is investigated prior to the submission of the TA.</p>	No borrow pits have been proposed at this stage. EIAR Volume 4: Technical Appendix 12.1: Transport Assessment is based on the worst-case traffic movements.
				It is agreed that ongoing operational traffic movements can be scoped out as these will be minimal and small scale.	Noted
			Chapter 13: Noise and Vibration	Based on the scope and duration of construction activities required for tower construction, it is expected that construction traffic noise impacts and construction traffic vibration impacts would negligible; therefore, no detailed assessment of construction traffic noise and vibration is proposed as part of the EIA Report.	Noted
				It is agreed that this matter can be scoped out due to the transitory nature of the noise associated with construction. However it is essential that the CEMP should address these matters and ensure that best practice is embedded into the CEMP and it is recommended that prior to the submission of the CEMP that consultations are undertaken with the appropriate Environmental Protection Officers for the area to ensure best practice mitigation is embedded into the CEMP and a clear path/actions required for resolution of any identified noise impacts is clearly set out.	Noted
			All	The Planning Authority is satisfied that the CEMP can provide for more detailed decommissioning and restoration proposals in respect of any temporary access tracks or construction works.	Noted
				Given the nature of the proposal it is considered that the clarification of normal operational safeguards in respect of construction and operation of a high voltage transmission line (and associated infrastructure such as GLSS and CDS) should be sufficient to address this matter and effectively this can be scoped out.	Noted

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
			Chapter 12: Traffic and Transport	The Planning Authority is in general agreement with the issues to be scoped out of the EIA, subject to the more detailed comments provided in this [scoping] response being addressed, particularly with respect to Traffic and Transport and potential cumulative impacts on the roads network.	See response above on cumulative developments
	Post-scoping. Consultation on cumulative list to be used in the EIAR.	14/04/22 (verbal feedback via SSEN)	Chapter 15: Cumulative Effects	An Carr Dhubh and Ladyfield Wind Farms should be include in the cumulative assessment and wirelines.	Noted, these projects have been included and provided in the cumulative projects list in EIAR Volume 2: Chapter 15: Cumulative Effects and EIAR Volume 3a: Figure 15.1: Cumulative Developments
SEPA	Scoping Response	23/03/2022	Chapter 10: Geology and Soils	Minimising impacts on peat and peatland must be addressed in the EIAR.	The layout of the Proposed Development has, as far as possible, been designed to avoid habitats of highest ecological importance and highest sensitivity to impacts as detailed in EIAR Volume 2: Chapter 2: Development Description . This includes priority peatland habitat. Mitigation measures are discussed in Chapter 8: Ecology .
			Chapter 8: Ecology and Chapter 11: Water Environment	Avoiding good quality or rare GWDTE habitats and minimising impacts on other GWDTE habitats must be addressed into the EIAR.	Impacts to GWDTEs are considered in EIAR Volume 4: Technical Appendix 11.2: Groundwater Dependent Terrestrial Ecosystem Assessment . In addition, direct impacts to sensitive habitats are covered in EIAR Volume 2: Chapter 8: Ecology .
			Chapter 11: Water Environment	Avoiding impacts on watercourses and other water features by ensuring suitable buffers and using best practice design crossings must be addressed in the EIAR.	Whilst the preferred 50 m buffer is acknowledged, many of the water features are smaller drains and it has not been possible to avoid a 50 m buffer along the entire proposed OHL (as shown in EIAR Volume 3a: Figure 11.1: Surface Water Features). Design of watercourse crossings would be the responsibility of the appointed Contractor and would adhere to the appropriate CIRIA and SEPA guidance.
			BNG	We note and are supportive of SSEN Transmission's Biodiversity Net Gain approach and look forward to seeing what will be delivered as part of this project. We would especially welcome any proposals for peatland or wetland restoration, riparian improvements and wet woodland planting.	Noted
			Chapter 2: Proposed Development	A map of the site layout must be provided on an adequate scale map. Each of the maps must detail all proposed upgraded, temporary and permanent site infrastructure. Existing built infrastructure must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.	EIAR Volume 3a: Figure 2.1: Proposed Development shows a map of the Proposed Development and Limits of Deviation. This map includes all proposed permanent and temporary infrastructure.
			Chapter 11: Water Environment	The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing:	Shown in EIAR Volume 3a: Figure 11.1: Surface Water Features .
				All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.	Shown in EIAR Volume 3a: Figure 11.1: Surface Water Features .

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				A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works.	Whilst the preferred 50 m buffer is acknowledged, many of the water features are smaller drains and it has not been possible to avoid a 50 m buffer along the entire route (EIAR Volume 3a: Figure 11.1: Surface Water Features). The majority of towers have been located outwith a 30 m buffer of watercourses. Based on previous experience, a 30 m buffer is considered a suitable distance as the construction of the towers is not anticipated to result in significant changes to hydrological conditions.
				Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.	The appointed Contractor would be responsible for drafting detailed drainage plans prior to construction.
				If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.	The appointed Contractor would be responsible for providing this information to SEPA prior to construction.
				Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application.	Design of watercourse crossings would be the responsibility of the appointed Contractor and would adhere to the appropriate CIRIA and SEPA guidance as set out in EIAR Volume 2: Chapter 11: Water Environment and EIAR Volume 4: Technical Appendix 11.3: Watercourse Crossing Assessment .
			Chapter 10: Geology and Soils	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, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.	Noted. This has been documented as part of EIAR Volume 2: Chapter 2: Development Description and EIAR Volume 2: Chapter 10: Geology & Soils where this has been practicable. It should be noted that the alignment design was mature prior to commencement of peat surveys.
				The EIAR 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 (2107) 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.	The locations of habitats with a potential to be GWDTE are shown in EIAR Volume 3a: Figure 11.5: Groundwater Dependent Terrestrial Ecosystems – NVC , and Figure 11.6: Hydrological Assessment of Groundwater Dependent Terrestrial Ecosystems . Private water supply abstractions are shown in Figure 11.8: Private Water Supplies (EIAR Volume 3a) .
				The EIAR must include 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.	This table is included in EIAR Volume 2: Chapter 10: Geology and Soils . How peat will be kept permanently wet will be the responsibility of the appointed Contractor, which is outlined in EIAR Volume 4: Technical Appendix 10.2: Outline Peat Management Plan .
				To avoid delay and potential objection 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.	Noted
				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 (as detailed in the above guidance) is required or	EIAR Volume 4: Technical Appendix 10.2: Outline Peat Management Plan .

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				whether the above information would be best submitted as part of the schedule of mitigation.	
			Chapter 11: Water Environment	<p>A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.</p> <p>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 GWDTE affected.</p> <p>Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include: a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.</p> <p>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.</p>	<p>The majority of the GWDTE habitats are not assessed to be groundwater dependent as set out in EIAR Volume 4: Technical Appendix 11.2: Groundwater Dependent Terrestrial Ecosystem Assessment. One sensitive habitat (a spring) where a small contribution from groundwater flow cannot be discounted is within 250 m of proposed excavations deeper than 1 m. This is shown in EIAR Volume 3a: Figure 11.7: Hydrological Assessment of Groundwater Dependent Terrestrial Ecosystems. Potential impacts to this habitat and mitigation to avoid impacts is set out in EIAR Volume 2: Chapter 11: Water Environment.</p> <p>The appointed contractor would be responsible for undertaking a pre-construction detailed site specific risk assessment of the sensitive spring habitat, and supplying this to SEPA. The contractor would also be responsible for setting out the proposed mitigation in consultation with SEPA.</p> <p>The majority of private water supply abstractions are surface water fed. Six of the supplies are however within 250 m of the Proposed Development as shown in EIAR Volume 4: Technical Appendix 11.3: Private Water Supply Assessment, Figure 11.3.2.</p> <p>The appointed Contractor would be responsible for undertaking detailed pre-construction PWS surveys, and implementing mitigation (set out in EIAR Volume 2: Chapter 11: Water Environment and EIAR Volume 4: Technical Appendix 11.3: Private Water Supply Assessment).</p>
			Chapter 14: Forestry	Proposals for felled forest material must be shown to comply with our Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS.	Noted. All proposals for felled forest materials will comply with the Use of Trees Cleared to Facilitate Development on Afforested Land guidance. After felling, any timber that is commercially viable will be sold and the remaining forest material would be dealt with in a way that delivers the best practicable environmental outcome and is compliant with waste regulations.
			Chapter 2: Proposed Development	Scottish Planning Policy states (Paragraph 243) that “Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place.” The submission must provide sufficient information to address this policy statement.	No borrow pits have been proposed at this stage. The need for borrow pits would be identified by the appointed contractor and, if required, details of the proposed locations, dimensions and justification for borrow pits would be provided to SEPA.

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
				<p>If borrow pits are proposed the following information should also be submitted:</p> <p>a) A map showing the location, size, depths and dimensions of each pit.</p> <p>b) Justification for the proposed location of each borrow pit and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock.</p> <p>c) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works.</p>	
			Chapter 16: Schedule of Mitigation	A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer.	The schedule of mitigation is set out in EIAR Volume 2: Chapter 16 as well as being detailed within the individual technical chapters and their supporting figures (EIAR Volume 3a).
NatureScot	Pre-scoping	13/09/2021	Chapter 6: SLVIA	NS reviewed the ZTV and have determined that the OHL is unlikely to have significant impacts on nationally designated landscapes. NS advised they will not be providing comment on the scope of the LVIA in line with their Service Level Statement. We refer you to Historic Environment Scotland for advice on potential impacts on the Inveraray GDL and Argyll and Bute Council for potential APQ impacts.	Noted
		09/03/2022		NS note the need for the amendment to the proposed OHL alignment due to a high risk of unexploded ordnance and acknowledge that this amendment may increase visibility from the Ben Lui Wild Land Area. We therefore welcome the inclusion of an additional viewpoint from Stac a'Chuirn within the WLA.	Noted
	Scoping Response	05/04/2022	Chapter 9: Ornithology	The key issues NS require to be addressed in detail as part of the EIA process include: Impacts on Glen Etive and Glen Fyne Special Protection Area (SPA) for breeding golden eagle; and Ornithological impacts, including direct impacts on golden eagle territories, various other Schedule 1 bird species and other species of conservation concern such as black grouse.	Undertaken in EIAR Volume 4: Technical Appendix 9.3: Habitats Regulations' Appraisal . Target species are stated in Technical Appendix 9.1: Ornithology Methodology (EIAR Volume 4) .

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			Chapter 10: Geology and Soils	The EIA must address impacts on nationally important carbon-rich soils, deep peat and priority peatland habitat	The avoidance of high-quality habitats that are actively peat-forming has been considered throughout the design process and these areas have been avoided, where possible. The full results of habitat surveys are provided in EIAR Volume 4: Technical Appendix 8.1: Ecology Methodology and Results and summarised in Section 8.38.3. Details of peat-probing surveys are provided in EIAR Volume 2: Chapter 10: Geology and Soils .
			Chapter 6: SLVIA	The EIA must address impacts on landscape and visual impacts, including Wild Land Areas and cumulative impacts.	Technical Note drafted to NS re WLIA methodology issued 28 March 2022, see EIAR Volume 2: Chapter 6: SLVIA .
			Chapter 9: Ornithology	The Scoping Report identifies several potential impacts on protected species of birds as a likely significant effect. It will therefore be essential to obtain up to date records of relevant sensitive protected breeding bird species which could be affected by the development, including through construction disturbance. Further relevant sources of this information include the RSPB and the Argyll Raptor Study Group as well as data collected for the nearby Blarghour and Ladyfield wind farms. The Review of Disturbance Distances in Selected Bird Species (2007) (https://www.nature.scot/doc/review-disturbance-distances-selected-birdspecies) provides guidance on disturbance distances for a number of sensitive breeding bird species which might occur close to the works of the Proposal	A review of desk study data is provided in EIAR Volume 2: Chapter 9: Ornithology .
			All	In general terms we agree with the proposed approach for baseline collection, prediction and significance assessment.	Noted
			Chapter 9: Ornithology	We note that ornithology surveys have been ongoing since February 2018 and are due for completion in February 2022. We are generally content with the proposed survey methodology although until we receive the environmental assessment and associated technical appendices, we cannot confirm that we are content with the ornithology surveys and assessments undertaken.	Noted
			Chapter 8: Ecology	We advise that pre-construction surveys should be undertaken to inform the presence of protected species. Any new access tracks should be subject to appropriate ecological surveys and assessment. If track widening works are required then ecological surveys should also be conducted in those areas if there is a possibility of protected species or habitats being present. If protected species could be affected by the proposal, mitigation should be identified and a Species Protection Plan supplied within the EIA Report.	The methodology for the field surveys undertaken on the site are provided in Technical Appendix 8.1: Ecology Methodology and Results (EIAR Volume 4) . The results of these surveys are provided in Section 8.38.3 and Technical Appendix 8.1: Ecology Methodology and Results (EIAR Volume 4) .
				We advise that pre-construction surveys should be scheduled to allow for sufficient time for species licences applications, if required, to be applied for before construction starts.	Pre-construction protected species surveys have been included as standard mitigation, as detailed in Chapter 8: Ecology (EIAR Volume 2) Section 8.4 along with Technical Appendix 8.1: Ecology Methodology and Results (Volume 4) .

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			Chapter 10: Geology and Soils	The proposed route currently crosses the Blarghour wind farm Habitat Management Area which aims to restore and enhance blanket bog/peatland habitat to increase the suitability for associated species, specifically golden eagle and black grouse. In order to avoid compromising these objectives the Applicant should avoid this area or consider undergrounding the overhead line if practicable.	The layout of the Proposed Development has, as far as possible, been designed to avoid habitats of highest ecological importance and highest sensitivity to impacts. This includes priority peatland habitat. Mitigation measures are discussed. Peatland habitat management issues are dealt with in the outline habitat management plan provided in Technical Appendix 8.2: Outline Habitat Management Plan (EIAR Volume 4) .
			All	We agree with the issues scoped out in the relevant sections.	Noted
			Chapter 9: Ornithology	<p>We have already provided pre-application advice (dated 4 March 2021) to the consultant in relation to the scope of the ornithology surveys and availability of satellite tag data.</p> <p>Given the sensitive location of the Proposal directly adjacent to the Glen Etive and Glen Fyne SPA, the EIA Report will need to include a robust assessment of the impacts on golden eagle, not only in relation to the SPA, but also in the context of its population Natural Heritage Zone population and transient birds.</p> <p>Additionally, golden eagle, white-tailed eagle, other Schedule 1 raptors, and black grouse are likely to be the main species of interest on the site. These should be assessed both for onsite impacts and also cumulative impacts from other operational and consented development at the relevant Natural Heritage Zone level.</p> <p>In addition, we wish to highlight that the Golden Eagle Topography (GET) model has recently become available to developers to help consider impacts on golden eagles (https://www.nature.scot/doc/naturescot-statement-modelling-support-assessment-forestry-and-windfarm-impacts-golden-eagles). NatureScot would be pleased if the Applicant would contact us to discuss the use of this model, in relation to the Proposal, if necessary.</p>	<p>Data obtained from Natural Research (discussed in EIAR Volume 4: Technical Appendix 9.3: Habitat Regulations' Appraisal).</p> <p>Target species are stated in EIAR Volume 4: Technical Appendix 9.1: Ornithology Methodology. Cumulative impact assessment methodology described in paragraph 9.2.24. This uses NHZ 14 as the baseline.</p> <p>GET models have been requested and will be used to inform the HRA. CRM process is described in EIAR Volume 4: Technical Appendix 9.1: Ornithology Methodology.</p>
			Chapter 8: Ecology	As the Proposal is partially located within commercial forestry, the Applicant will need to take into account whether any ongoing forestry work has affected the recorded activity, and also what foraging habitat changes there may be from felling and restructuring should this happen during the lifetime of the Proposal.	EIAR Volume 2: Chapter 8: Ecology assess the effects of felling of the operational corridor on habitats.
			Chapter 9: Ornithology	The proposed route as shown is potentially ~1km distance from the G/LAE golden eagle nest sites. Whilst there may be an altitudinal separation between the nests and the Proposal we would recommend that the OHL is positioned as low as practicable within the proposed route. This advice also applies to the ridge to the north of the nest sites which is predicted to be an area of significant use by the GET model.	The Proposed Development runs close to existing infrastructure at the bottom of Glen Aray, away from areas of high golden eagle activity as outlined in EIAR Volume 2: Chapter 9: Ornithology .

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				Scoping Report Section 7.5.1 Collision Risk Methodology states that the method of Collision Risk Modelling will be agreed with NatureScot. However, our Guidance - Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds (https://www.nature.scot/doc/guidance-assessment-andmitigation-impacts-power-lines-and-guyed-meteorological-masts-birds#5.+Collision+Risk+Modelling) states that currently there is no statistical model available which we are confident would provide a robust assessment of potential mortality. Collisions are usually site, season, and species-specific, and a generic collision risk model is unlikely to accurately predict levels of mortality. We do not, therefore, currently recommend a generic modelling approach.	CRM process is described in EIAR Volume 4: Technical Appendix 9.1: Ornithology Methodology.
				In recognition of the difficulty this presents we recommend that emphasis is put on mitigation where surveys indicate potential conflicts. In cases where impacts are likely to be severe, and mitigation may not reduce this sufficiently, bespoke models may be useful if they are based on the best available information from the site and on the attributes and status of the species of concern. An example of this may be where there is a level of flight activity at the proposed line which is high enough to raise concerns about potential collision mortality impacts at a designated site or regional population scale.	Following consideration of potential collision risk impacts, no significant impacts are predicted and no mitigation is required as outlined in EIAR Volume 2: Chapter 9: Ornithology.
				We encourage developers to programme construction out with the breeding bird season, so as to reduce the risk of committing an offence. However, as the breeding season coincides with the best weather for construction, we recognise that this will not always be possible. In such situations, we recommend that a pre-construction breeding bird survey takes place, to inform how works can best be programmed to avoid disturbance.	Where possible, construction would be undertaken outside of the breeding bird season. If not, pre-construction surveys would be undertaken as outlined in EIAR Volume 2: Chapter 9: Ornithology.
			Chapter 10: Geology and Soils	The scoping layout indicates that parts of the site are underlain with Class 2 peatlands which are nationally important carbon rich soils, deep peat and priority peatland habitats. As such, there is a requirement for detailed peat and vegetation surveys to be undertaken to ascertain the quality and distribution of peatland and priority habitats across the site as per NatureScot guidance (https://www.nature.scot/doc/advisingcarbon-rich-soils-deep-peat-and-priority-peatland-habitat-developmentmanagement#Assessing+the+impacts+of+development+on+carbon-rich+soils,+deep+peat+and+peatland).	The layout of the Proposed Development has, as far as possible, been designed to avoid habitats of highest ecological importance and highest sensitivity to impacts. This includes priority peatland habitat. Mitigation measures are discussed in EIAR Volume 2: Chapter 8: Section 8.4. Peatland habitat management issues are dealt with in the outline habitat management plan provided in EIAR Volume 4: Technical Appendix 8.2: Outline Habitat Management Plan). Peatland mitigation is also considered in EIAR Volume 2: Chapter 10: Geology and Soils. An outline peat management plan is provided in EIAR Volume 4: Technical Appendix 10.2: Outline Peat Management Plan. Best practice for working in peatland is also considered in EIAR Volume 4: Technical Appendix 10.3: Peat Landslide Hazard Risk Assessment.
				It is not clear whether constructed tracks would be required to facilitate construction of this line within Class 1 & 2 peatlands, however, we consider that these and construction compounds should not be located within these areas. We advise that the use of low ground pressure vehicles, temporary trackway or bog mats and minimising vehicle movements would reduce impacts to this habitat.	Class 1 & 2 peatlands have been avoided as much as possible. However, where this is not possible, mitigation in the form of peatland restoration and the use of low ground pressure vehicles, temporary trackway or bog mats and minimising vehicle movements in the habitats would be required to reduce impacts on the habitat, as detailed in EIAR Volume 2: Chapter 8: Ecology

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				Albeit that peatland classifications may change in light of detailed site specific surveys, we advise that efforts are made to avoid the siting of towers and associated infrastructure on areas of nationally important peatland and areas of deep peat. The EIA Report should demonstrate that any significant effects have been substantially overcome by siting, design or other mitigation. Details of all mitigation and restoration, including a peatland management plan, should be included in the EIA Report.	The layout of the Proposed Development has, as far as possible, been designed to avoid habitats of highest ecological importance and highest sensitivity to impacts. This includes priority peatland habitat. Mitigation measures are discussed in EIAR Volume 2: Chapter 8: Section 8.48.5 . Peatland habitat management issues are dealt with in Technical Appendix the OHMP provided in EIAR Volume 4: Technical Appendix 8.2: Outline Habitat Management Plan . Peatland mitigation is also considered in EIAR Volume 2: Chapter 10: Geology and Soils . An outline peat management plan is provided in EIAR Volume 4: Technical Appendix 10.2: Outline Peat Management Plan . Best practice for working in peatland is also considered in EIAR Volume 4 Technical Appendix TA 10.3: Peat Landslide Hazard Risk Assessment .
			Chapter 6: SLVIA	We are broadly content with the approach to the assessment of landscape and visual impacts outlined in the Scoping Report. We note the intention to carry out Wild Land Assessments for the Ben Lui Wild Land Area (WLA) and Loch Etive Mountains WLA for this Proposal.	Additional consultation with NatureScot provided in EIAR Volume 2: Chapter 6: SLVIA has concluded that a Wild Land Areas assessment can be scoped out.
				Cumulative landscape and visual impacts are likely to be key issues for consideration in the EIA Report given other developments in the area. The cumulative landscape and visual impact assessment should take account of the current baseline (i.e. development which is existing or under construction). Other development scenarios; e.g. consented but not constructed schemes should be considered under the cumulative scenarios in accordance with our cumulative guidance.	A cumulative assessment is provided in EIAR Volume 2: Chapter 6: SLVIA . The list of cumulative developments included are set out in EIAR Volume 2: Chapter 15: Cumulative Effects and EIAR Volume 3a: Figure 15.1: Cumulative Developments
			All	Report for submission, the following requirements should be noted: <ul style="list-style-type: none"> · For ease of use, text chapters and appendices of EIA Report should be presented on A4 paper (rather than A3); · Landscape figures to be provided in a ring binder (rather than being spiral or otherwise bound), for ease of use during site visits; · A full hard copy of the landscape figures should be sent directly to the NatureScot case officer – all other supporting information can be electronic but please ensure that file sizes are <10MB per pdf; · Ensure that electronic file names clearly indicate their content (e.g. (OHL name) - LVIA Figure (number of VP) – VP2 (name of VP)); · Full survey details including raw data, viewshed maps and flight maps with labelled flightlines showing the flights banded into below, at and above collision risk height and referenced to a table of flight data, etc., should be presented in the EIA Report. Information and assessment of direct and indirect impacts (including cumulative), along with details of any mitigation should also be presented; · Sensitive species information can be presented in a confidential annex with restricted circulation. 	Noted
	Post-Scoping	15/04/2022	Chapter 6: SLVIA	We defer to the local authority for comments on the RVAA.	Noted

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				<p>The WLA should be carried out in accordance with our 'Assessing impacts on Wild Land Areas'- technical guidance available on our website (https://www.nature.scot/doc/assessing-impacts-wild-land-areas-technical-guidance).</p>	<p>Additional consultation has been undertaken with with NatureScot with regards to the WLIA. Technical Appendix 5.6, EIAR Volume 4, was provided to NS which included a review of ZTV, Relative Wildness and photomontages, to support scoping out a WLIA considering guidance provided by NS. It was then subsequently agreed with NS that the WLIA could be scoped out for the reasons outlined in Chapter 6: SLVIA (EIAR Volume 2) .A detailed response on the WLA was supplied to NatureScot on 17/05/22, and a meeting held on 20/05/22.</p> <p>It was agreed no WLA was required (see NatureScot response below)</p>
				<p>We welcome the intention to carry out fieldwork in the respective Wild Land Areas to gain a more detailed understanding of the areas potentially affected and the wider area. The assessment should focus on effects on the physical attributes and perceptual responses that contribute to the WLA qualities identified in the Wild Land Descriptions available on our website (https://www.nature.scot/doc/wild-land-areas-map-and-descriptions-2014). The fieldwork should allow for a review of the 2014 descriptions, as well as review of any other potential changes, which will form the baseline of the assessment. We would like to emphasise the need to consider how people move through the area, with a focus on the effect on the wild land qualities and their experiential nature. We recommend the use of 'assessment points' to record, in the field, the likely effects on the experience of the wild land qualities while moving through the WLA. A wider understanding of movement through the area could be gained from literature and websites including for example Walkhighlands.</p>	
				<p>In terms of the assessment, it should be presented in a clear format in accordance with our Wild Land Assessment guidance, describing sensitivity and effects on each quality to ensure transparency. The narrative should make reference to the physical attributes and perceptual responses where relevant. The assessment should be augmented by visuals including a detailed ZTV (showing the full extent of the Wild Land Area) as well as geo-referenced photographs taken during the site visit, and appropriate visualisations to illustrate the proposed development.</p>	
				<p>A brief justification for the 10km study area should be provided, together with a summary of the Qualities likely to be significantly affected, and relevant supporting information e.g. visuals, detailed ZTV for the respective WL Areas etc. We would be happy to comment on the scope of the assessments in due course.</p>	
		23/05/2022		<p>Having viewed the initial material [Ramboll written response to the above supplied on 17/05/22] NatureScot agree that a full WLIA would not be necessary in this instance. The material and justification for this should be included in the LVIA. It is the role of the competent authority to decide whether an assessment is required and you should discuss this further with them.</p>	
				<p>NatureScot also agree with the proposed approach to the implications of commercial forest felling in the study area on the likely landscape and visual effects attributable to the proposed development, as per the LT40 Inveraray – Crossaig OHL development. It would impracticable assess forest plans along the entirety of the proposed development.</p>	Noted

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
	Post-scoping	13/04/2022	Chapter 15: Cumulative Effects	We are broadly content with the cumulative developments as outlined in the table and note the intention not to include Car Duibh and Ladyfield wind farms in the detailed cumulative assessment.	Noted
				An assessment of cumulative impacts associated with a the development proposal should encompass the impacts of the proposal in combination with: <ul style="list-style-type: none"> Existing development, either built or under construction; Approved development, awaiting implementation; and Proposals awaiting determination within the planning process with design information in the public domain. Proposals and design information may be deemed to be in the public domain once an application has been lodged, and the decision-making authority has formally registered the application. Occasionally it may be appropriate to include proposals in an assessment which are at earlier stages of development (including at scoping), particularly where clusters of development or “hotspots” emerge, or where proposals are adjacent to one another.	Noted
				In this instance we believe that the area surrounding the Creag Dhubh to Inveraray OHL can be described as a development “hotspot” with clusters of developments at various stages, including the Car Duibh and Ladyfield wind farms which are in very close proximity to the OHL (Car Duibh ~4km and Ladyfield ~1.6km distant). There is potential for significant interactions should these wind farms progress to application stage and you may be required to undertake additional work to take account of these interactions depending on timescales. Therefore we believe it would be pertinent to include them in the cumulative impact assessment based on the currently available information. However, the decision as to which proposals in the planning/ consenting system should be included in an assessment ultimately the responsibility of the planning/ determining authority and you should seek confirmation from ECU in this case.	These projects have been included in the list of cumulative developments included are set out in EIAR Volume 2: Chapter 15: Cumulative Effects and EIAR Volume 3a: Figure 15.1: Cumulative Developments.
				For information; planning/ determining authorities are empowered under EIA Regulation 19 and Article 13 General Development Procedure (S) Order 1992 (or the relevant section of the Electricity Works EIA regulations) to seek additional information from the applicant at any point in the determination of the application. If an EIAR which includes assessment of cumulative impacts is nearing completion when a new planning proposal is submitted for another site in the same area, the decision-making authority may regard the new application as a material consideration. They may therefore request the first developer to extend its cumulative impact assessment to take account of the new application.	Noted
HES	Pre-scoping	26/04/2022	Chapter 7: Cultural Heritage	We are content that the methodology proposed for the assessment is appropriate and that the study areas proposed are adequate for the revised Proposed Route.	The methodology and study areas used for the assessment are set out in EIAR Volume 2: Chapter 7: Cultural Heritage.

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				We are content that the proposed visualisation viewpoints are acceptable for the revised Proposed Route. We do not have any additional comments to make.	Visualisations (photomontages, photo-wirelines and/or wirelines) are provided for each of these assets from locations agreed with HES (Figures 7.3-7.9, EIAR Volume 3a). A list of visualisations, along with details of their locations and visualisation type, is provided in Table 7.5.
				There are no additional assets that we wish to see visualisations for.	These are referenced where applicable in EIAR Volume 4: Technical Appendix 7.2 and EIAR Volume 2: Chapter 7: Cultural Heritage .
	Scoping Response	29/04/2022		We are content that the scope and methodology proposed for the assessment of impacts on cultural heritage, as set out in the Scoping Report and in separate correspondence of 07 April 2022 from CFA Archaeology Ltd, the applicant's cultural heritage consultants, is appropriate.	The methodology and study areas used for the assessment are set out in EIAR Volume 2: Chapter 7: Section 7.2: Assessment Methodology and Significance Criteria .
RSPB	Scoping Response	03/04/2022	Chapter 9: Ornithology	RSPB Scotland advises that an Environmental Impact Assessment Report (EIAR) for this proposal should establish the potential impacts of the development on important bird populations within the area, with emphasis given to assessing potential impacts upon raptors, particularly golden eagle.	Noted
				The proposed site is within / in close proximity to the Glen Etive and Glen Fyne SPA designated for supporting a population of Annex 1 species (list of the EC Birds Directive) golden eagle; therefore there is potential for it to impact upon the SPA. Note two golden eagle territory (to the west of the route) which are part of the wider golden eagle population in this area and any indirect impacts should be considered by the EIAR – this should include a Habitat Regulations Assessment.	See EIAR Volume 4: Technical Appendix 9.3: Habitats Regulations' Appraisal .
				The following Annex 1/priority LBAP bird species have been highlighted in the scoping report as occurring within or close to the proposal: golden eagle, goshawk. The potential impacts on all of these species should be adequately covered within the EIAR. Other species occur at a distance that means impacts are unlikely include black grouse, hen harrier, merlin and white tailed eagle.	Target species are stated in EIAR Volume 4: Technical Appendix 9.1: Ornithology Methodology . Mitigation for golden eagle and goshawk is not considered to be required.
				It should be remembered that all nesting birds are protected by law and therefore we would advise that any vegetation removal / ground disturbance required along the route should occur outwith the breeding season (March-August) or that these areas are checked prior to work starting to ensure no nesting birds are present.	EIAR Volume 2: Chapter 9: Ornithology outlines that where possible, construction would be undertaken outside of the breeding bird season. If not, pre-construction surveys would be undertaken.
				The EIA should establish how priority species use the area, through the vantage point observation surveys, plotting of flightlines and related information to determine any potential impacts / mitigation. It should consider present usage in comparison to the potential alteration of habitat and displacement / collision / barrier effects which may occur during and due to the development. NB Goshawks are difficult to survey/monitor and ideally further information and mitigation should inform this application	EIAR Volume 2: Chapter 9: Ornithology outlines that mitigation for golden eagle and goshawk is not considered to be required.
				The northern part of proposal lies in close proximity / within the Glen Etive and Glen Fyne SPA designated for its golden eagle population. There is potential for it to impact up on it and a Habitat Regulations Assessment is required, we would advise that the route stays to the west of the actual	As stated in EIAR Volume 2: Chapter 2: Description of Development , the route does not cross the A819 into the SPA.

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				SPA and avoids crossing the A819 into the site – if it does enter the site then we advise mitigation may be required.	
				To reduce potential impacts on the eagle territories to the west of the route we advise that scoping should consider mitigation – including routing the line towards the eastern edge of the corridor and applying increased visibility of the line where it transits close to eagle eyrie sites – measures should be for the life time of the line so some form of coloured line sheathing which is replaced as per line maintenance schedule. NB. in regards to 7.5 collision risk – this is very difficult to ascertain for OHL especially given that periods of reduced visibility i.e. cloud will occur in the area which is impossible to fully consider in modelling hence why we suggest the mitigation as outlined.	EIAR Volume 2: Chapter 9: Ornithology outlines the potential collision risk impacts, with no significant impacts predicted and no mitigation required.
				We would advise consulting Argyll Raptor Study Group in relation to your survey work and information relating to the eagle territories and other raptors within this area.	Review of desk study data is provided in EIAR Volume 2: Chapter 9: Ornithology .
				Black grouse - Proposal will not site towers close to any know lek sites. However in terms of positive delivery consideration should also be given to mitigation works for the species within the site and surrounding area.	The Biodiversity Net Gain assessment for the project will create areas of additional habitat, this will likely include areas of broadleaved woodland which would benefit black grouse.
			Chapter 10: Geology and Soils	The EIAR should include a full survey, impact assessment and proposals for mitigation in relation to important habitats on this site. Mitigation should ideally minimise any impact and avoid areas of high-quality habitats found upon the site. Particular attention should be given to peatland – the proposal should minimise / avoid the class 2 peat areas which the route transits – an eastern route within the corridor should enable this with class 5 route reducing peat impacts. A full assessment of the carbon implications of this proposal should be undertaken and if required a mitigation plan for any peatland affected.	The layout of the Proposed Development has, as far as possible, been designed to avoid habitats of highest ecological importance and highest sensitivity to impacts. This includes priority peatland habitat. Mitigation measures are discussed in Section 8.48.5. Peatland habitat management issues are dealt with in Technical Appendix the outline habitat management plan provided in EIAR Volume 4: Technical Appendix 8.2: Outline Habitat Management Plan . Peatland mitigation and carbon implications of the Proposed Development are also considered in EIAR Volume 2: Chapter 10: Geology and Soils . An outline peat management plan is EIAR Volume 4: Technical Appendix 10.2: Outline Peat Management Plan (EIAR Volume 4) . provided in Technical Appendix 10.2: Outline Peat Management Plan . Best practice for working in peatland is also considered in EIAR Volume 4: Technical Appendix 10.2 and Technical Appendix 10.3: Peat Landslide Hazard Risk Assessment .
			Chapter 8: Ecology and Chapter 14: Forestry	The route has the potential to cut across several areas as Ancient Woodland, any loss of this habitat should be minimised and if unavoidable compensatory native planting should be undertaken. In regards to compensatory planting from commercial woodland impacts we advise that this should focus on native woodland creation ideally rainforest within Argyll / native upland woodland transition within the route area. To try and achieve positive biodiversity gain.	Habitat loss would occur in Ancient Woodland, as detailed in EIAR Volume 2: Chapter 8: Ecology and in Chapter 14: Forestry . Mitigation measures include compensatory native tree planting to enhance existing Ancient Woodland areas, as detailed in EIAR Volume 4: Technical Appendix 8.2: Outline Habitat Management Plan .
				The EIAR should consider what mitigation measures are required to minimise the impact on both important habitats and species and contain detailed ecological justification for any such proposals. Ideally, this should include relevant time frames for mitigation in relation to site development.	Mitigation measures are detailed in EIAR Volume 2: Chapter 8: Ecology along with the assessment of cumulative and residual effects. Methods of assessment are detailed in EIAR Volume 4: Technical Appendix 8.1: Ecology Methodology and Results .

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			Chapter 9: Ornithology	An assessment of cumulative bird impacts in relation to other existing, consented and proposed projects (predominantly forestry and wind farms), within this natural heritage zone (NHZ) and local area / eagle ranges should be undertaken.	As outlined in EIAR Volume 2: Chapter 9: Ornithology the cumulative impact assessment methodology uses NHZ 14 as the baseline.
Scottish Forestry	Scoping Response	30/03/2022	Chapter 14: Forestry	<p>There is therefore a strong presumption in favour of protecting Scotland's woodland resources and the Scottish Government provides policy direction in the policy on control of woodland removal. Woodland removal should be kept to a minimum and where woodland is felled it should be replanted. The policy supports woodland removal only where it would achieve significant and clearly defined additional public benefits. In some cases, including those associated with development, a proposal for compensatory planting may form part of this balance.</p> <p>The criteria for determining the acceptability of woodland removal is explained in the policy and the applicant should take them into account when preparing the proposal. Beyond this, the applicant should refer to guidance documents issued by Scottish Forestry (and previously by Forestry Commission- FC) in relation to good forestry practice and sustainable forest management.</p>	The Proposed Development addresses this through minimising the woodland removal both through careful route selection and by defining the Operation Corridor appropriately for different woodland types. Compensatory planting to achieve no net loss of woodland for the Proposed Development, in-line with CoWRP objective is outlined in EIAR Volume 2: Chapter 14: Forestry .
				Where woodland removal is proposed for development, the relevant Environmental Impact Assessment (EIA) regulations will apply and the EIA Report should justify and provide evidence for the need for woodland removal and the associated mitigation measures.	The Proposed Development addresses this through careful route selection and by avoiding main woodland boundary edges where possible as outlined in EIAR Volume 2: Chapter 14: Forestry .
				The first consideration for the applicant should be whether the underlying purpose of the proposal can reasonably be met without resorting to woodland removal. Design approaches that reduce the scale of felling required to facilitate the development must be considered and integration of the development with the existing woodland structure is a key part of the consenting process.	The Proposed Development addresses this through careful route selection and by avoiding main woodland boundary edges where possible as outlined in EIAR Volume 2: Chapter 14: Forestry .
				Integration of the project into future forest design plans is a key part of the development process. The removal of large areas of woodland will not be supported. When a proposed development or infrastructure requires to go through forestry, consideration should be given to forest design guidelines.	The Operational Corridor (OC) width that has been assessed and identified for the safe build and energisation of the new OHL through the areas of commercial conifer woodland is 85 m (42.5 m either side of the OHL centreline). The OC width through the areas of native broadleaved woodland is 60 m (30 m either side of the OHL centreline). This has been assessed as a maximum OC width required at these woodland locations, with the potential of further narrowing of the OC prior to construction to allow greater tree retention. A desk-based assessment using Forest Gales software has identified the woodland exposure to windthrow and included proposed management felling coupes to achieve suitable woodland windfirm boundaries of least impact to the forest landscape. The felling of these areas is subject to Landowner agreement and by method of Scottish Forestry felling licence approval or Long-Term Forest Plan formal amendment.

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				The proposal to consider the potential environmental impacts and likely significant effects associated with the seven elements of sustainable forest within the individual topic chapters, rather than in a Forestry Chapter is acceptable. This should be prepared by a suitably qualified professional and supported by existing records, site surveys and aerial photographs. In order to present the relevant information about the forest and to secure compliance with the UK Forestry Standard, the applicant should consider the appropriate scope for each topic chapter.	Noted
				The effects of felling, woodland removal and re establishment should be considered (i.e. not just woodland removal). This should also include indirect impacts on adjacent woodlands.	The effects of felling, woodland removal and re-establishment, and woodland management are considered in EIAR Volume 2: Chapter 14: Forestry and EIAR Volume 4: Technical Appendix 8.2: Outline Habitat Management Plan .
				This can, as suggested in the Scoping Report, be achieved by describing effects in the relevant Environment Receptor chapters, however, they should be clearly cross referenced from the proposed Chapter 12 Land Use and effects should be summarised in the Technical appendix.	The effects of felling, woodland removal and re-establishment, and woodland management are considered in EIAR Volume 2: Chapter 14: Forestry and EIAR Volume 4: Technical Appendix 8.2: Outline Habitat Management Plan .
				We recommend that each relevant chapter contain a section dedicated to the effect of woodland management activity.	Noted
				The loss of irreplaceable ancient woodland habitat must be given sufficient weight in the analysis, especially given the cumulative impacts of the SSE projects now on stream.	This is considered in EIAR Volume 2: Chapter 14: Forestry and EIAR Volume 4: Technical Appendix 8.2: Outline Habitat Management Plan .
				We advise that within the Scottish Government's Control of Woodland Removal Policy, there is a strong presumption against woodland removal applied to the following: <ul style="list-style-type: none"> · Woodland types listed in the EC Habitats Directive; · UK BAP priority woodland types in areas mainly composed of ancient, semi-natural woodland (ASNW), ancient woodlands planted with native species, long-established woodlands of plantation origin (LEPO) with significant biodiversity interest, or well established semi-natural priority woodland types. 	Noted
				The Scoping Report, P 62 -12.5 proposes the development of OHL Woodland Reports for each forest ownership impacted by the Proposed Development. The OHL Woodland Reports will identify all areas of felling required to form the operational corridor and access corridors. In addition, the OHL Woodland Reports would aim to reduce the risk of future wind throw by identifying felling to stable forest edges (outside of the operational corridor). The timing for provision of these reports is not stated and SF assume that they will be available with the EIA report consultation.	These reports are provided in EIAR Volume 4: Technical Appendix 14.1: OHL Woodland Report .
				The topic chapters should describe and recognise the social, economic and environmental values of the forest and the woodland habitat and take into account the fact that, once mature, the forest would have been managed into a subsequent rotation, often through a restructuring (re-designing) proposal, according to the UK Forestry Standard, that would have	Noted

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
				increased the diversity of tree species and the landscape design of the forest.	
				The topic chapters should describe the baseline conditions of the forest, including its ownership. This will include information on species composition, age class structure, yield class and other relevant crop information. The chapter should describe the changes to the forest structure, the woodland composition and describe the work programme:	This is covered in EIAR Volume 2: Chapter 14: Forestry.
				the proposed areas of woodland for felling to accommodate the proposed infrastructures, including access roads, tracks, underground pipes and cables and any ancillary structures. Details of the area to be cleared around those structures should also be provided, along with evidence to support the proposed scale and phasing of felling;	This is covered in EIAR Volume 2: Chapter 14: Forestry.
				trees felled must be replanted on-site or compensated for (off-site planting) and these areas must be clearly identified in the plan. On-site replanting must always be considered first. The replanting operations must be appropriately described, including changes to the species composition, age class structure, timber production and traffic movements. Tree/shrub species must be suited to the site and the objectives of management;	This is covered in EIAR Volume 2: Chapter 14: Forestry.
				areas of open ground in the forest that are designed for biodiversity or landscape enhancement or for recreation opportunities should not be considered for on-site replanting (to compensate for woodland removal in other parts of the forest).	Noted
				The applicant should consider the potential cumulative impact of existing and the proposed development on the forest resource in respect to the local and regional context. In particular consideration must be given to the implication of felling operations on such things as habitat connectivity, biodiversity, water management, landscape impact, impact on timber transport network and forestry policies included in the local and regional Forestry and Woodland Strategies and local development plans.	Cumulative impacts on the forest resource and impacts on forestry policies are considered in EIAR Volume 2: Chapter 14: Forestry. The effects of felling on habitat connectivity and biodiversity are detailed in Section 8.4. The implications of felling on water management are detailed in EIAR Volume 2: Chapter 11: Water Management. The landscape and visual implications of felling are detailed in EIAR Volume 2: Chapter 6: LVIA. The implications of felling on the timber transport network are detailed in EIAR Volume 2: Chapter 12: Traffic and Transport.
				The UK Forestry Standard is the Government's reference standard for sustainable forest management in the UK and provides a basis for regulation and monitoring. The Scottish Government expects all forestry plans and operations in Scotland to comply with the standards. Both felling operations and on and off-site compensatory planting must be carried out in accordance to good forestry practice- the EIA Report must clearly state that the project will be developed and implemented in accordance with the standard. A key component of this is to ensure that even-age woodlands are progressively restructured in a sustainable manner: felling coupes should be phased to meet adjacency requirements and their size should be of a scale which is appropriate in the context of the surrounding woodland environment.	This is covered in EIAR Volume 2: Chapter 14: Forestry.

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
				Scottish Forestry is the main forestry consultee and should be consulted throughout the development of the proposal to ensure that proposed changes to the woodland are appropriate and address the requirements of policy on control of woodland removal and the principles of sustainable forest management.	Noted.
				It is important that pre-application discussions takes place with the local Scottish Forestry Conservancy office, the planning authority and other relevant key agencies, at the earliest possible stage of the project, to ensure all parties have a shared understanding of the nature of the proposed development, information requirements and the likely timescale for determination. This collaborative approach will ensure that all forestry issues are identified and mitigated at the earliest opportunity. The applicant should allow sufficient time in their project plan to accommodate such advice.	Noted.
Scottish Water	Scoping Response	22/04/2022	Chapter 11: Water Environment	A review of our records indicates that the proposed activity falls partly within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. The Cladich Intake catchment supplies Cladich Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number 0800 0778 778 and local Scottish Water contact details will be provide prior to construction work commencing.	The Proposed Development is not within the catchment area of the Cladich Water DWPA (Figure 11.2: Drinking Water Protected Areas, EIAR Volume 3a). The Proposed Development falls entirely within the River Aray catchment.
				The chosen route will run through the Cladich Intake catchment therefore there is a risk to drinking water quality as previously discussed Scottish Water and in particular the Sustainable Land Management team will need to be heavily involved in the project.	The Proposed Development is not within, or within 500 m of, the catchment area of the Cladich Water DWPA (Figure 11.2: Drinking Water Protected Areas, EIAR Volume 3a). The Proposed Development falls entirely within the River Aray catchment.
				We will need to see copies of Pollution Prevention Plans and any CEMP documents as they are developed.	The appointed Contractor will be responsible for drafting the final Construction Environmental Management Plan (CEMP) and Pollution Prevention Plan (PPPs), and sharing these with the appropriate statutory consultees in advance of construction.
				There are also a number of Scottish Water assets along the route. There is a 4" asbestos cement (AC) and a 125mm medium-density polyethylene (MDPE) water distribution main near the northeast end of the route. These pipes appear to be in the road verge running past the substation. A separate 4" AC water distribution main follows the route of the B8077 and there is also a 3" AC raw water main near Claddich running northeast from the raw water intake (RWI). This should be confirmed however through obtaining plans from our Asset Plan Providers. Details of our Asset Plan Providers are included in the SW list of precautions for assets, which can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm .	Scottish Water asset plans were obtained for the route of the OHL. No assets are indicated to fall within the 500 m buffer of the Proposed Development. The appointed Contractor will be responsible for confirming the presence of Scottish Water assets and would liaise directly with Scottish Water to achieve the appropriate consents if any potential conflict was identified.

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				All Scottish Water assets potentially affected by the activity should be identified, with particular consideration being given to access roads and pipe crossings. If necessary, local Scottish Water personnel may be able to visit the site to offer advice. All of Scottish Water's processes, standards and policies in relation to dealing with asset conflicts must be complied with.	The appointed Contractor will be responsible for confirmation of the presence of Scottish Water assets and would liaise directly with Scottish Water to achieve the appropriate consents if any potential conflict was identified.
				In the event that asset conflicts are identified then early contact should be made with HAUC Diversions Team via the Development Services portal. All detailed design proposals relating to the protection of Scottish Water's assets should be submitted to the HAUC for review and written acceptance. Works should not take place on site without prior written acceptance by Scottish Water.	The appointed Contractor will be responsible for confirmation of the presence of Scottish Water assets and would liaise directly with Scottish Water to achieve the appropriate consents if any potential conflict was identified.
				Scottish Water have produced a list of precautions for a range of activities. The list of precautions for assets details protection measures to be taken if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. The document/s and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm .	The appointed Contractor will be responsible for confirmation the presence of Scottish Water assets and detailing the mitigation measures required in consultation with Scottish Water if any potential conflict was identified.
				It should be noted that the proposals will be required to comply with Sewers for Scotland and Water for Scotland 4th Editions 2018, including provision of appropriate clearance distances from Scottish Water assets.	The appointed Contractor will be responsible for confirmation of the presence of Scottish Water assets and complying with the appropriate legislation.
				Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm .	The Proposed Development is not within, or within 500 m of, a Scottish Water DWPA (Figure 11.2: Drinking Water Protected Areas (EIAR Volume 3a)). The appointed Contractor will be responsible for confirmation of the presence of Scottish Water assets and would liaise directly with Scottish Water to assess and achieve the appropriate mitigation if any potential conflict was identified.
				The fact that this area is located within a drinking water catchment should be noted in future documentation. Also anyone working on site should be made aware of this during site inductions. We would request further involvement at the more detailed design stages, to determine the most appropriate proposals and mitigation within the catchment to protect water quality and quantity.	The Proposed Development is not within, or within 500 m of the DWPA as shown in Figure 11.2: Drinking Water Protected Areas, EIAR Volume 3a .
				We would also like to take the opportunity, to request that 3 months' notice is given in advance of any works commencing on site, Scottish Water is must be notified at protectdwsources@scottishwater.co.uk . This will enable us to be aware of activities in the catchment and to arrange a site meeting, which will be necessary.	The appointed contractor would be responsible for notifying Scottish Water in advance of any construction works taking place.

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
				<p>For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.</p> <p>There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.</p> <p>In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.</p>	The appointed Contractor will be responsible for detailed drainage design and should take this into consideration.
				<p>Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area, then they should write to the Customer Connections department at the above address.</p>	The appointed Contractor will be responsible for detailed drainage design and should take this into consideration.
				<p>If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.</p>	The appointed Contractor will be responsible for detailed drainage design and should take this into consideration.
				<p>Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.</p>	The appointed Contractor will be responsible for detailed drainage design and should take this into consideration.
				<p>The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.</p>	The appointed Contractor will be responsible for detailed drainage design and should take this into consideration.
				<p>All proposed developments require to submit a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water via our Customer Portal prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.</p> <p>Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations.</p>	The appointed Contractor would be responsible for submitting all appropriate documentation in advance of construction.

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
				<p>Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including; manufacturing, production and engineering; vehicle, plant and equipment washing, waste and leachate management. It covers both large and small premises, including activities such as car washing and laundrettes. Activities not covered include hotels, caravan sites or restaurants.</p> <p>Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off.</p>	Whilst there is no anticipated requirement for trade effluent discharge, the appointed Contractor would be responsible for submitting all appropriate documentation in advance of construction.
Transport Scotland	Scoping Response	07/04/2022	Chapter 12: Traffic and Transport	<p>The nearest trunk road to the proposed route is the A83(T) at Inveraray, however, we note there are no proposals to cross the trunk road. The SR indicates that it has been assumed that towers would be a maximum of 60m above ground level, with a typical average tower height of 50 m above ground level.</p>	No action required
				<p>We also note that it is anticipated that construction would commence in 2024 with a provisional construction period of 18 months in total and energisation of the project scheduled for 2026.</p>	No action required
				<p>Chapter 10 of the SR presents the proposed methodology for the assessment of potential effects of the Proposed Development on access, traffic and transport during the construction phase. This states that the thresholds as indicated within the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Road Traffic are to be used as a screening process for the assessment. The SR also indicates that potential trunk road related environmental impacts such as driver delay, pedestrian amenity, severance, safety etc will be considered and assessed where appropriate (i.e. where IEMA Guidelines for further assessment are breached). These specify that road links should be taken forward for assessment if:</p> <ul style="list-style-type: none"> • Traffic flows will increase by more than 30%, or • The number of HGVs will increase by more than 30%, or • Traffic flows will increase by 10% or more in sensitive areas. <p>We note that the proposed Study Area will include the A83(T) to the south and east of Inveraray and the A819 from Inveraray to Cladich, with base traffic data being obtained from the UK Department of Transport (DfT) traffic survey database.</p>	Noted
				<p>Transport Scotland is in agreement with this approach but would add that base traffic data should be factored to the construction year of 2024 using NRTF low growth factors. Where significant changes in traffic are not noted for any link, no further assessment needs to be undertaken.</p>	Noted
				<p>It is noted that any impacts associated with the operational phase of the development are to be scoped out of the EIA. We would consider this to be acceptable in this instance.</p>	Agreed

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
				<p>The SR states that a Construction Traffic Management Plan (CTMP) is likely to be included within the assessment. This is welcomed and we would ask that a copy of this be forwarded to the Area Manager when it becomes available. The Area Manager for the A83(T) is Neil MacFarlane who can be contacted on 0141 272 7433 or at neil.macfarlane@transport.gov.scot.</p>	The Traffic Management Plan is included in EIAR Volume 4: Technical Appendix 12.1: Transport Assessment.
				<p>The SR makes no mention of any requirement for the use of abnormal load deliveries. Should such loads be necessary during the construction phase, Transport Scotland will require a full Abnormal Loads Assessment report to be provided with the Environmental Impact Assessment Report (EIAR) that 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>	No AIL movements are associated with the Proposed Development
Ironsides Farrar	Scoping Response	07/04/2022	Chapter 10: Geology and Soils	<p>The Peatland mapping shows sections of the route in the north and central/southern area comprise Class 5 soils, which includes carbon soils with deep peat. Smaller areas of Class 2 soils, which are defined as supporting nationally important carbon-rich soils, deep peat and priority peatland habitat, are shown present in the northern and central part of the Proposed Development. Smaller areas mapped as Class 3 soils are shown to be present in the central area. Class 3 soils are predominantly peaty soils with some heath vegetation. Mineral soils are shown elsewhere along the route. British Geological Society mapping does not identify peat along the route. OS mapping confirms that slopes of greater than 2 degrees are present along the line of the development. These factors confirm that a Peat Landslide Risk Assessment for the works will be required.</p>	Noted. A PLHRA is provided in EIAR Volume 4: Technical Appendix 10.3 PLHRA.
				<p>As per the ECU Best Practice Guide 2017 we would anticipate that the PLHRA would include fieldworks and probing, at appropriate frequencies, of towers, tracks, U/G cabling and associated infrastructure including construction related facilities in areas where peat might be present. If there are any areas where detailed probing is not proposed due to peat not being present, these would require to be robustly justified by review of mapping, walkovers by qualified professionals and the primary 100m probing grid proposed. The fieldworks would form part of the risk assessment for the route together with desk study, likelihood/consequence assessments and mitigation as required. The PLHRA would be submitted as a self-explanatory standalone document and would be closely linked to both the Geology and Soils and Water Environment chapters and any Peat Management Plan.</p>	Noted. A PLHRA is provided in EIAR Volume 4: Technical Appendix 10.3 PLHRA.
MoD	Scoping Response	14/03/2022	Aviation	No concerns	Noted
British Telecoms	Scoping Response	22/03/2022	Telecommunications	The Project indicated should not cause interference to BT's current and presently planned radio network.	Noted
Glasgow Airport	Scoping Response	30/03/2022	Aviation	The site is located within the IFP safeguarding area for Glasgow Airport. In this location, only structures exceeding 300m AGL would require IFP safeguarding assessment.	Noted

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
				Our position with regard to this proposal will only be confirmed once the development details are finalized and we have been consulted on a full planning application, if required. At that time we will carry out a full safeguarding impact assessment and will consider our position in light of, inter alia, operational impact and cumulative effects.	Noted
Glasgow Prestwick Airport	Scoping Response	07/04/2022		We are satisfied that this development has no impact on either our primary radars or published Instrument Flight Procedures (IFP's) – therefore Glasgow Prestwick Airport (GPA) Ltd is unlikely to object to this development should this proposed OHL come to a full Section 37 Planning Application.	Noted
Marine Licensing and Consenting	Scoping Response	07/04/2022	Chapter 8: Ecology	It is our understanding from the Scoping Report that there are no works as part this project which fall below the Mean High Water Level which may impact the marine environment.	Noted
				On this occasion, there is nothing for MCA to assess with regards to the marine environment as far as we are aware. We therefore have no comments to make on the Scoping Report on this occasion.	Noted
Office for Nuclear Regulation	Scoping Response	10/03/2022	Nuclear	With regard to planning application ECU00003442, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.	Noted