

Report on Consultation

Melgarve Cluster

LT218 Cloiche, LT280 Glenshero & LT287 Dell

May 2022



CONTENTS

GLOSSARY	3
PREFACE	5
EXECUTIVE SUMMARY	6
1. INTRODUCTION	7
1.1 Background and Purpose of Document	7
1.2 Objectives	7
1.3 Document Structure	7
2. PROJECT OVERVIEW	9
2.1 The Need for the Project	9
2.2 Preferred Technology Solution	9
2.3 Alternative Options Considered	10
2.4 Proposals Overview	10
3. CONSIDERATION OF ROUTE OPTIONS	14
3.1 Introduction	14
3.2 Identification of Preferred Routes	14
4. THE CONSULTATION PROCESS	17
4.1 Overview	17
4.2 Methods for Consultation	17
5. CONSULTATION RESPONSES FROM STATUTORY AND NON-STATUTORY CONSULTEES	20
5.1 Introduction	20
6. COMMUNITY CONSULTATION RESPONSES FROM THE VIRTUAL PUBLIC EXHIBITION EVENTS	87
6.1 Introduction	87
7. PROJECT RESPONSES TO CONSULTATIONS	95
7.1 Overview	95
7.2 Summary of Key Consultation Responses for Grid Connections	95
7.3 Summary of Key Consultation Responses for Melgarve Substation	96
7.4 Project Responses	97
8. CONCLUSIONS AND NEXT STEPS	99
8.1 Conclusion	99
8.2 Next Steps	99

Figures

Figure 1: Preferred Route Options

GLOSSARY

Term	Definition
Alignment	A centre line of an overhead line OHL, along with location of key angle structures.
Alignment (preferred)	An alignment for the overhead line taken forward to stakeholder consultation following a comparative appraisal of alignment options.
Alignment (proposed)	An alignment taken forward to consent application. It comprises a defined centre line for the overhead line and includes an indicative support structure (tower or pole) schedule, also specifying access arrangements and any associated construction facilities.
Amenity	The natural environment, cultural heritage, landscape and visual quality. Also includes the impact of SHE Transmission plc's works on communities, such as the effects of noise and disturbance from construction activities.
Biodiversity Net Gain (BNG)	A process intended to leave nature in a better state than it started using good practice principles established by the Business and Biodiversity Offset Programme (BBOP) and organisations including CIRIA, CIEEM and IEMA.
Conductor	A metallic wire strung from structure to structure, to carry electric current.
Consultation	The dynamic process of dialogue between individuals or groups, based on a genuine exchange of views and, normally, with the objective of influencing decisions, policies or programmes of action.
Corridor	A linear area which allows a continuous connection between the defined connection points. The Corridor may vary in width along its length; in unconstrained areas it may be many kilometres wide.
Environmental Impact Assessment (EIA)	Environmental Impact Assessment. A formal process codified by EU directive 2011/92/EU, and subsequently amended by Directive 2014/52/EU. The national regulations are set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. The EIA process is set out in Regulation 4(1) of the regulations and includes the preparation of an EIA Report by the developer to systematically identify, predict, assess and report on the likely significant environmental impacts of a proposed project or development.
GWDTE	Ground Water Dependent Terrestrial Ecosystem
Habitat	Term most accurately meaning the place in which a species lives, but also used to describe plant communities or agglomerations of plant communities.
Habitat Management Plan	A plan outlining measures for preserving or managing wildlife within a given area. In the context of development, the plan often comprises part of the scheme of mitigation measures to control environmental impacts.
Kilovolt (kV)	One thousand volts.
Listed Building	Building included on the list of buildings of special architectural or historic interest and afforded statutory protection under the 'Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997' and other planning legislation. Classified categories A – C(s).
Micrositing	The process of positioning individual structures to avoid localised environmental or technical constraints.
Mitigation	Term used to indicate avoidance, remediation or alleviation of adverse impacts.
Overhead line (OHL)	An electric line installed above ground, usually supported by lattice steel towers or poles.
Plantation Woodland	Woodland of any age that obviously originated from planting.

Term	Definition
RAG Rating	Each topic within the environmental, technical and cost categories should be considered in terms of the potential for the development to be constrained and a Red/Amber/Green (RAG) rating applied as appropriate.
Route	A linear area of approximately 1 km width (although this may be narrower/wider in specific locations in response to identified pinch points / constraints), which provides a continuous connection between defined connection points.
Route (preferred)	A route for the overhead line taken forward to stakeholder consultation following a comparative appraisal of route options.
Route (proposed)	A route taken forward following stakeholder consultation to the alignment selection stage of the overhead line routeing process.
Routeing	The work undertaken which leads to the selection of a proposed alignment, capable of being taken forward into the consenting process under Section 37 of the Electricity Act 1989.
Scheduled Monument	A monument which has been scheduled by the Scottish Ministers as being of national importance under the terms of the 'Ancient Monuments and Archaeological Areas Act 1979'.
Semi-natural Woodland	Woodland that does not obviously originate from planting. The distribution of species will generally reflect the variations in the site and the soil. Planted trees must account for less than 30% of the canopy composition.
Sites of Special Scientific Interest (SSSI)	Areas of national importance. The aim of the SSSI network is to maintain an adequate representation of all natural and semi-natural habitats and native species across Britain.
Span	The section of overhead line between two structures.
Special Area of Conservation (SAC)	An area designated under the EC Habitats Directive to ensure that rare, endangered or vulnerable habitats or species of community interest are either maintained at or restored to a favourable conservation status.
Special Landscape Area (SLA)	Landscapes designated by the Highland Council which are considered to be of regional/local importance for their scenic qualities.
Special Protection Area (SPA)	Special Protection Area – designated under Directive 2009/147/EC on the Conservation of Wild Birds (the Birds Directive).
Stakeholders	Organisations and individuals who can affect or are affected by SHE Transmission plc works.
Study Area	The area within which the Corridor, route and alignment study takes place.
The National Grid	The electricity transmission network in the Great Britain.
Underground Cable (UGC)	An electric cable installed below ground, protected by insulating layers and marked closer to the surface to prevent accidental damage through later earthworks.
Volts	The international unit of electric potential and electromotive force.
Wayleave	A voluntary agreement entered into between a landowner upon whose land an overhead line is to be constructed and SHE Transmission plc.

PREFACE

This Report on Consultation has been prepared by prepared by ASH Design and Assessment Ltd. on behalf of Scottish and Southern Electricity Networks Transmission (SSEN Transmission), operating under licence held by Scottish Hydro Electric Transmission plc, who own, operate and develop the high voltage electricity transmission system in the north of Scotland and remote islands. This report provides a summary of the responses received from key stakeholders (including statutory and non-statutory consultees, local communities, landowners and individual residents) during consultation between November 2021 and February 2022 in response to preferred routes for the following new 132 kV connections:

- Glenshero Wind Farm connection to Melgarve Substation via an underground cable (UGC);
- Cloiche Wind Farm connection to Melgarve Substation via an overhead line (OHL); and
- Dell Windfarm connection to Melgarve Substation via an OHL.

The Melgarve Cluster project also consists of the extension of Melgarve substation to accommodate the three new connections.

The Consultation Document¹ is available online at the project website:

<https://www.ssen-transmission.co.uk/projects/melgarve-cluster>

To engage stakeholders on the project, SSEN Transmission undertook online consultation with statutory consultees, via a Teams meeting hosted by The Highland Council, and via a virtual consultation platform to enable the local community to experience the full exhibition from home on a computer, tablet or mobile device. The online exhibitions were designed to look and feel like a real consultation in a community hall, with exhibition boards, maps, interactive videos and the opportunity to share views on the proposals.

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

The consultation events took place at the following times:

- 3rd November 2021: meeting with statutory consultees;
- 10th January 2022: virtual public exhibition 16:00 – 19:00; and
- 11th January 2022: virtual public exhibition 16:00 – 19:00.

This Report on Consultation also provides a summary of how SSEN Transmission have responded to comments received by key stakeholders on the preferred route options and details the actions that will be taken as the project progresses through to the alignment stage.

¹ SSEN Transmission (October 2021), Melgarve Cluster Consultation Document

EXECUTIVE SUMMARY

Three proposed wind farm grid connections of the Melgarve Cluster Project in the Highland Council area require connection to the electricity transmission network at Melgarve substation. These three wind farm developments are the Glenshero Wind Farm, the Cloiche Wind Farm, and the Dell Wind Farm, which require connection by the following dates:

- Glenshero Wind Farm: by Autumn 2024;
- Dell Wind Farm: by Spring 2026; and
- Cloiche Wind Farm: by Summer 2026.

The Melgarve Cluster project also consists of the extension of Melgarve substation to accommodate the three new connections.

This Report on Consultation documents the consultation process which has been undertaken for the project between November 2021 and February 2022. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for, and approach to, the selection of the preferred routes for each connection.

This report describes the key responses received and provides detail on the actions proposed in response to the issues raised. The comments received throughout the consultation process has highlighted that for the Cloiche Wind Farm Connection the Preferred Route remains as Route Option C3. For the Dell Wind Farm Connection, the Preferred Route remains as Route Option D1. For the Glenshero Wind Farm Connection, as the only option appraised, Route Option G1 remains as the Preferred Route. It is noted that a number of consultee comments queried the rationale for selection of overhead line connections for Cloiche and Dell wind farms rather than underground cable and asked that this choice be revisited. In order for SSEN Transmission to consider a case for underground cable further technical and environmental assessments will be undertaken during the Alignment Selection Stage.

The preferred route for each connection has been selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors. Each will become a Proposed Route taken forward to the alignment stage of this project for each connection.

1. INTRODUCTION

1.1 Background and Purpose of Document

- 1.1.1 Scottish and Southern Electricity Networks (SSEN Transmission), operating under licence held by Scottish Hydro Electric Transmission plc, owns, operates and develops the high voltage electricity transmission system in the north of Scotland and remote islands.
- 1.1.2 SSEN Transmission is proposing to construct multiple connections to connect three wind farm developments to Melgarve substation, as required as part of the Melgarve Cluster project.
- 1.1.3 The Melgarve Cluster project comprises the grid connections for three wind farm developments and consists of four components. These are:
- Glenshero Wind Farm connection to Melgarve Substation via an underground cable (UGC);
 - Cloiche Wind Farm connection to Melgarve Substation via an overhead line (OHL);
 - Dell Windfarm connection to Melgarve Substation via an OHL; and
 - the extension of Melgarve substation.
- 1.1.4 This Report on Consultation documents the consultation process for the project between November 2021 and February 2022, during the route option stage of the project. The programme of consultation was designed to engage with key stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the Preferred Route option for each connection². Preliminary feedback on the substation extension was also obtained during these processes.
- 1.1.5 The report describes the key responses received and details the actions taken in response to the issues raised.

1.2 Objectives

- 1.2.1 The objectives of this report are:
- To document the consultation process between November 2021 and February 2022;
 - To summarise feedback received from stakeholders;
 - To document actions undertaken in response to feedback where relevant; and
 - To clearly set out how the Preferred Route for each connection has been informed by the consultation process.

1.3 Document Structure

- 1.3.1 This Report on Consultation is structured as follows:

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

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

Section 3: Consideration of Route Options – describes how the preferred routes were identified for each connection;

² Identified within the Melgarve Cluster Consultation Document (October 2021), produced by SSEN Transmission

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

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

Section 6: Community Consultation Responses from the Virtual Public Exhibition – summarises the range of responses and key comments and issues arising through the consultation process;

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

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

2. PROJECT OVERVIEW

2.1 The Need for the Project

- 2.1.1 The new connections would be routed within a previously identified corridor, as defined in SSEN Transmission's Corridor Briefing Note.³
- 2.1.2 The proposed Cloiche Wind Farm consists of up to 36 turbines of a maximum height of 149.9 metres with an installed capacity of between 150 MW and 200 MW. To connect the Wind Farm to the grid, a new 132 kV single circuit connection to Melgarve substation is proposed.
- 2.1.3 The proposed Dell Wind Farm consists of up to 14 turbines with heights between 115.5 metres and 130.5 metres and with an installed capacity of up to 42 MW. To connect the Wind Farm to the grid, a new 132 kV single circuit connection to Melgarve substation is proposed.
- 2.1.4 The proposed Glenshero Wind Farm is in the southern part of the Melgarve Corridor and consists of up to 39 turbines with height between 149.9 metres, with an installed capacity of up to 168 MW. To connect the Wind Farm to the grid, a new 132 kV single circuit connection to Melgarve substation is proposed.

2.2 Preferred Technology Solution

2.2.1 As stated, the proposed Melgarve Cluster Project requires three grid connections. Details of the potential technology solution per connection are set out as follows:

- Cloiche Wind Farm Connection:
 - Use of steel lattice towers is the preferred engineering solution for OHL.
 - A short section of UGC, approximately 0.4 km in length, would be required on the final approach to Melgarve substation to cross the existing Beaully – Denny OHL.
 - Melgarve substation has been selected as the preferred connection point for Cloiche Wind Farm to the National Grid, due to it being the closest transmission substation, at approximately 8 km, and thus providing the most cost-effective point of connection.
- Dell Wind Farm Connection:
 - Use of steel lattice towers is the preferred engineering solution for OHL.
 - A short section of UGC, approximately 0.4 km in length, would be required on the final approach to Melgarve substation to cross the existing Beaully – Denny OHL.
 - Melgarve substation has been selected as the preferred connection point for Dell Wind Farm to the National Grid. Although Fort Augustus substation is only marginally further from Dell Wind Farm than Melgarve substation, Melgarve substation was chosen as the preferred connection point for Dell Wind Farm due to environmental grounds as set out within the aforementioned Corridor Briefing Note.
- Glenshero Wind Farm Connection:
 - The proposed engineering solution (customer choice) is to install an underground cable.
 - Melgarve substation has been selected as the preferred connection point for the Wind Farm to the National Grid due to it being the closest transmission substation, at approximately 4.4 km.

³ SSEN Transmission, (May 2021), Corridor Briefing Note - Melgarve Cluster.

2.2.2 Details of the above options are provided below; however, until a proposed alignment for the OHL has been identified and detailed assessments and consultation have been completed, the specific combination of technology options is not known.

2.3 Alternative Options Considered

2.3.1 As noted above, it is anticipated that the preferred solution would be achieved via the construction and operation of a new 132 kV OHL supported on steel lattice towers for Dell and Cloiche and UGC for Glenshero.

2.3.2 SSEN Transmission's New Suite of Transmission Structures (NeSTS) monopoles were also initially considered for use in parts of the connection. However, these have been deemed a less viable option for this connection given increased costs potentially required for design and testing, and uncertainty over the conductor options available. As such, this tower option is not explored further in this Report. Trident wood poles were discounted at an early stage due to the elevation of the site rendering them unsuitable for use. Trident steel poles were also an initial consideration; however, these are at an early stage in the engineering design and approvals process which may continue for a number of years and not currently considered viable for use as part of the Melgarve Cluster.

2.4 Proposals Overview

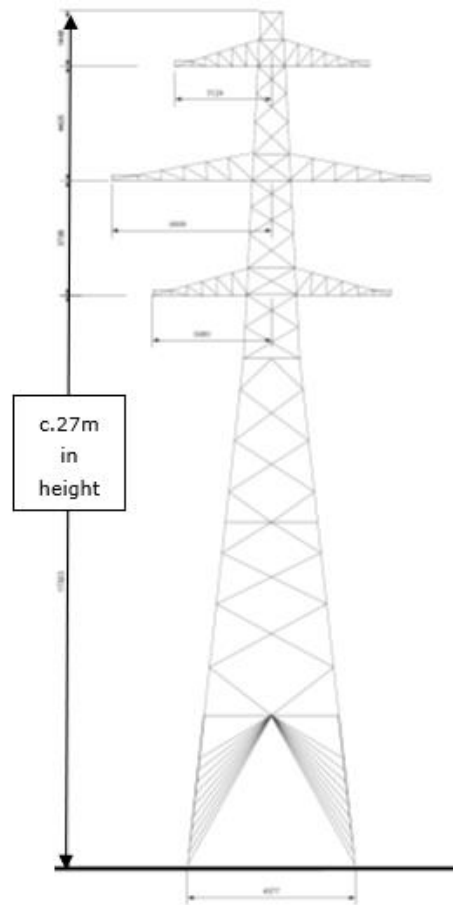
General Construction Activities for an OHL

2.4.1 To facilitate the Dell and Cloiche connections, the main construction elements associated with these developments are anticipated to include:

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

2.4.2 It is currently anticipated that the steel lattice structures would be of the L7 suite of towers with a height range of between 22 m and 39 m and having an average span length of 250 m. **Plate 2.1** shows example OHL structures for illustrative purposes.

1. Plate 2.1: Example Steel Lattice Tower OHL Structure



Underground Cable

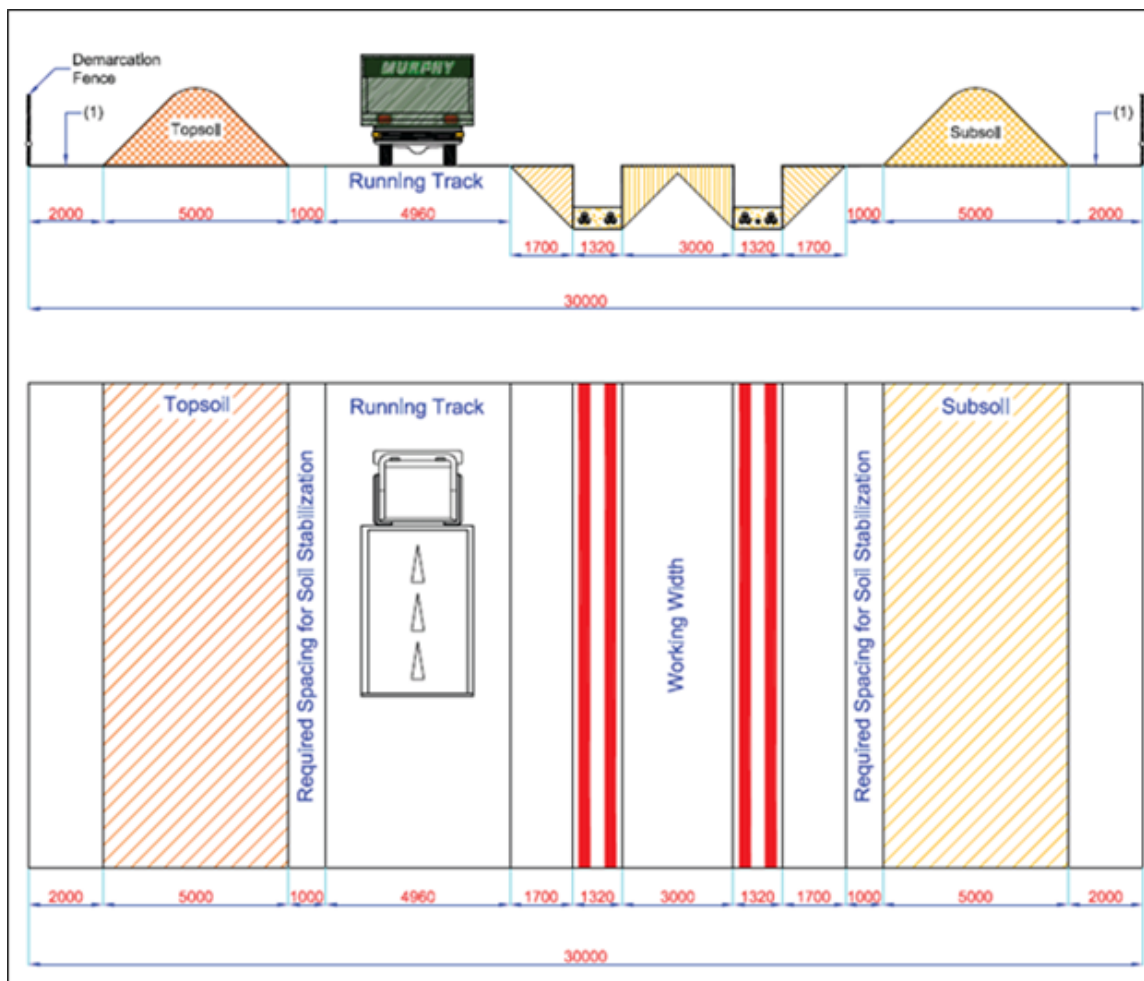
2.4.3 An UGC would be utilised for the entire length of the Glenshero connection.

2.4.4 It is anticipated that installation of the UGC would involve the following tasks:

- establish a working corridor approximately 30 m wide, centred on the cable centreline;
- excavate a trench up to 2 m in depth and 1 m wide, widening through benching and battering where stability and safety concerns arise;
- clear out all materials likely to damage cable ducts, e.g. clods, rocks, stones and organic debris, and employ use of pumps to remove any water;
- place cabling within the trench, surrounded by engineered backfill in suitable layers for protection, with marker boards placed above the cable line; and
- reinstate excavated layers in reverse order with turves replaced vegetation side up.

2.4.5 **Plate 2.2** shows a diagram of a typical UGC construction corridor.

2. Plate 2.2: Example of a typical UGC Construction Corridor



Forestry Removal

- 2.4.6 Construction of the project may require the removal of sections of commercial forest, depending on the choice of the Preferred Route for each connection, which would be undertaken in consultation with affected landowners. Scottish Forestry would also be consulted throughout the development of the project and the project would seek to adhere to Scottish Government’s Control of Woodland Removal Policy.⁴
- 2.4.7 After felling, any timber removed that is commercially viable would likely be sold and the remaining forest material would be dealt with in a way that delivers the best practicable environmental outcome and is compliant with waste regulations.
- 2.4.8 An operational corridor would be required to enable the safe operation and maintenance of each OHL. This would vary depending on the type of woodland (based on species present) in proximity to the OHL, and the height of support structures used within each woodland area. In areas of native woodland, it is usually possible to provide a narrower corridor due to a reduced risk of trees falling on the OHL.
- 2.4.9 Compensatory Planting will be undertaken for all woodland removed as a direct result of the project.

⁴ Forestry Commission Scotland (2019) Control of Woodland Removal Policy

Access during Construction

- 2.4.10 It is anticipated that traffic for the construction and operation of these projects would reach the site via two main access routes. The first would be to the plateau of higher ground, currently occupied by the Glendoe Reservoir and Stronelaig Wind Farm. Construction traffic would most likely reach this via the A82 onto the B862, then onto the existing Glendoe access track which stems off the B862 approximately 2 km east of Fort Augustus. This existing access track was constructed to carry heavy-duty construction vehicles and has been maintained for the Glendoe Hydro Scheme and Stronelaig Wind Farm, presenting a suitable and obvious choice. The existing access track network for Stronelaig Wind Farm would be expanded as part of the other proposed wind farms associated with the Melgarve Cluster project, and these could potentially be utilised as far as practicable to limit new access construction.
- 2.4.11 The second would be to the lower ground in the south of the Corridor, around Melgarve substation and along General Wade's Military Road. Access to this area would most likely be from the A86, then a series of unnamed tracks starting from the Wolftrax junction, and finally along the existing access road constructed for the Beauly – Denny OHL and Melgarve substation which runs east – west to the north of the River Spey. As for works on the higher ground, the existing access network in this area would be used as far as practicable, however, there is likely to be a greater requirement for establishment of new access.
- 2.4.12 At present it is too early in the development of these projects to confirm whether stone tracks installed for construction would be retained for operational maintenance access or whether where they would be removed. This would be developed as part of the alignment selection process following further design development and stakeholder consultation in advance of detailed assessments required for any forthcoming EIA and application for s37 consent and / or planning permission.

Programme

- 2.4.13 It is anticipated that construction time required for each connection would vary, but an average of 20 months would be required, following the granting of consents, although detailed programming of the works would be the responsibility of the Contractor in agreement with SSEN Transmission.
- 2.4.14 Every effort will be made to minimise disturbance to landowners, local residents and other stakeholders during construction by providing regular updates on works and restrictions via the site manager, community liaison manager and corporate affairs team.

3. CONSIDERATION OF ROUTE OPTIONS

3.1 Introduction

3.1.1 The Consultation Document⁵ sets out the approach to the consideration and appraisal of route options, in line with SHE Transmission's routeing guidance⁶. The guidance sets out SSEN Transmission's approach to selecting a route for an OHL. This document helps SSEN Transmission to meet its obligations under Schedule 9 of the Electricity Act 1989, which requires transmission license holders:

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

3.1.2 In line with the principles outlined in the guidance document, the method of identifying a Preferred Route for each connection has involved the following 4 key tasks:

- identification of the baseline situation;
- identification of alternative route options;
- environmental, technical and economic analysis of route options; and
- identification of a preferred route.

3.2 Identification of Preferred Routes

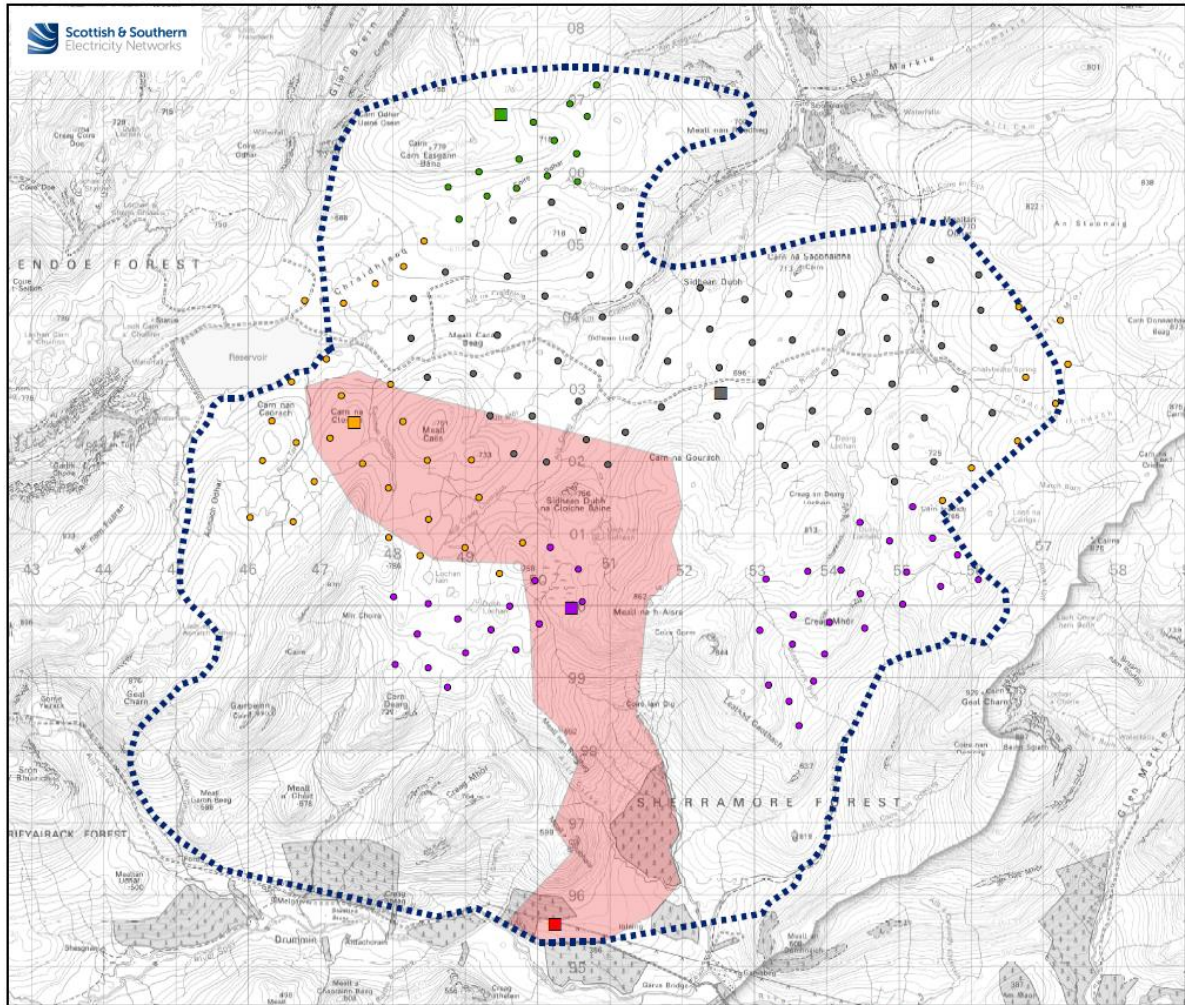
3.2.1 The preferred routes for the Cloiche Wind Farm connection and the Dell Wind Farm connection were selected on the basis that they are considered to provide an optimum balance of environmental, technical and economic factors.

3.2.2 Due to the relatively short distance (c.4.4 km) and difficult terrain only one viable route option was identified for the Glenshero Wind Farm connection. As such, a comparative assessment was not required and instead a summary appraisal was undertaken to provide a baseline for further investigation in the next stage of the Routeing Process. The preferred routes for the Cloiche and Dell connections presented with the Consultation Report are shown in **Plate 3.1** and **Plate 3.2**.

⁵ SSEN Transmission (November 2021). Melgarve Cluster Consultation Document

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

Plate 3.1: Preferred Route – Cloiche Wind Farm



4. THE CONSULTATION PROCESS

4.1 Overview

4.1.1 In accordance with SSEN Transmission's guidance⁷, a process of consultation on the Preferred Route for each connection has been undertaken.

4.2 Methods for Consultation

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

Meeting with Statutory Consultees

4.2.2 SSEN Transmission held a face-to-face meeting with representatives from THC, NatureScot, SEPA and HES on 3rd November 2021. At this meeting, SSEN Transmission delivered presentations on the route options and substation extension options to the representatives in attendance and followed with a round table discussion of each statutory consultee's comments and suggested actions in relation to the proposals.

4.2.3 The Consultation Document, discussed below, was provided to statutory consultees following the meeting to provide further detail on the route options appraisals carried out and invite further comments.

Consultation Document

4.2.4 The Melgarve Cluster Consultation Document (November 2021) was produced detailing the selection process for the Preferred Route for each of the three connections, taking account of environmental, economic and technical factors. The Consultation Document was made available for download on 30th October 2021 from <https://www.ssen-transmission.co.uk/projects/melgarve-cluster>

4.2.5 **Table 4.1** details the stakeholders in receipt of the Consultation Document or otherwise informed of the website details:

Table 4.1: List of Stakeholders

Stakeholders	
Statutory Consultees*	
Historic Environment Scotland (HES)	NatureScot
Scottish Environment Protection Agency (SEPA)	The Highland Council (THC)
Non-Statutory Consultees	
Aird and Loch Ness Ward Councillors	Badenoch & Strathspey Ward Councillors
British Telecom (BT)	Caol and Mallaig Ward Councillors
Civil Aviation Authority (CAA) - Airspace	Connell Renewables Ltd
Crown Estate Scotland	Dell Estate
Fort Augustus & Glenmoriston Community Company	Fisheries Management Scotland (FMS)
Glengarry Community Council	Glengarry Community Woodlands and Laggan Forest Trust (LFT)
Glengarry Trust	Highland and Islands Airports (HIA)
Hillhouse Estates	Inverness South Ward councillors
John Muir Trust	Joint Radio Company (JRC)

⁷ SSEN Transmission (September 2020), Procedures for Routing Overhead Lines and Underground Cables of 132kV and above

Stakeholders	
Laggan Community Council	Ministry of Defence (MoD)
Mountaineering Scotland	National Air Traffic Service (NATS)
Ness District Salmon Fisheries Board	RSPB
RSP Safeguarding	Scotways
Scottish Forestry	Scottish Water
Scottish Wildlife Trust	Scottish Wild Land Group (SWLG)
SIMEC (Glenshero Wind Farm and Jahama Highland Estate)	Spean Bridge, Roy Bridge and Achnacarry Community Council
Spey District Salmon Fisheries Board	SSE Generation Limited as owner / operator of Glendoe Hydro Scheme
SSE Renewables for Cloiche Wind Farm	Strathdearn Community Council
Stratherrick and Foyers Community Council	Stratherrick and Foyers Community Trust
Stronelairg Wind Farm Ltd	Transport Scotland

*The Scottish Government's Energy Consents Unit (ECU) was copied into the consultation distribution but provided no comments. They will be consulted again prior to submission of the request for an EIA Screening Opinion for the Cloiche/Dell OHL.

4.2.6 Feedback on the Consultation Document was initially requested by 23rd December 2021. The consultation period was extended to allow for virtual public exhibitions to take place in January 2022 and provide additional time for non-statutory consultees to respond in full. The consultation period ended on 11th February 2022, however some consultation responses received after this date have been included herein.

4.2.7 Stakeholders were invited to provide feedback through the following methods:

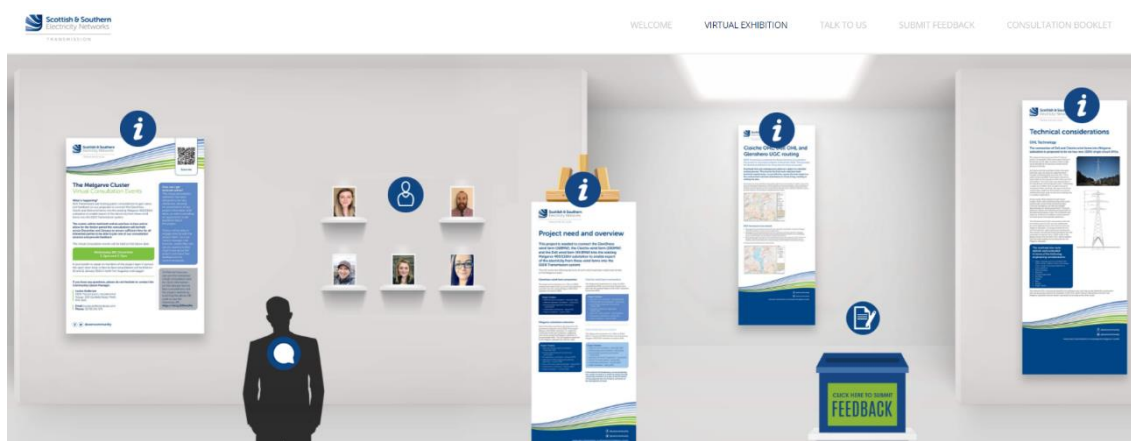
- A series of questions were asked within the Consultation Document requesting comments on specific aspects of the project as follows:
 - Has the need for the project been clearly explained?
 - Are there any additional factors, or environmental features, that you consider important and should be brought to the attention of the project team?
 - Do you have any other comments regarding the route options and layout?
 - Following review of the provided information, how would you describe your understanding of the Melgarve Cluster project?
 - Overall, how do you feel about the Melgarve Cluster project?
 - And finally, from your experience to date, can you rate the quality of consultation undertaken on the Melgarve Cluster project?
- A live chat function formed part of the virtual public exhibition events allowing members of the public to raise questions directly with SSEN Transmission representatives; and
- A feedback form was also provided on the project webpage alongside the virtual exhibition link allowing users to submit comments.

Public Consultation Events

4.2.8 To engage stakeholders on the project, and in line with the Town and Country Planning (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020, SSEN Transmission undertook online consultation via a virtual consultation platform to enable the local community to experience the full exhibition from home on a computer, tablet or mobile device.

- 4.2.9 Visitors were able to engage directly with the project team, via a live chat function, where they could ask any questions, they might have about the project and share their feedback on the current proposals.
- 4.2.10 This Report on Consultation also provides a summary of how SSEN Transmission have responded to comments received by key stakeholders on the preferred route options and details the actions that will be taken as the project progresses through to the alignment stage.
- 4.2.11 The online exhibition was designed to look and feel like a real consultation in a community hall, with exhibition boards, maps, and the opportunity to share views on the proposals as illustrated in **Plate 4.1**.
- 4.2.12 Visitors were able to engage directly with the project team, via a live chat function, where they could ask any questions they might have about the project and share their feedback on the current proposals. A feedback form was provided on the portal and all visitors were invited to complete this.
- 4.2.13 The virtual consultation events took place via the project website <https://www.ssen-transmission.co.uk/projects/melgarve-cluster> at the following times:
 - 10th January 2022: virtual public exhibition 16:00 – 19:00; and
 - 11th January 2022: virtual public exhibition 16:00 – 19:00.

Plate 4.1: Virtual Event Portal



- 4.2.14 The virtual consultation events were advertised in the local Press and Journal on 8th, 10th and 12th November 2021, and then again on 3rd, 5th and 7th January 2022. They were advertised in the Stathspey & Badenoch Herald on 2nd December 2021 and 6th January 2022. SSEN Transmission’s social media channels and the dedicated project management website were also used throughout this period to advertise the virtual consultation events. A mail drop of a booklet and letter informing of the event was also carried out to 822 households within the vicinity of the Melgarve Cluster proposals on 25th November 2021 and 22nd December 2021.
- 4.2.15 Visitor counts during the virtual consultation event recorded 32 unique users (individuals devices accessing the site) and 238 page views (the number of different pages loaded across the site) across the four interactive sessions. Various instances of chat were initiated with the project team via the live chat function with a total of 40 questions asked by visitors. A total of 10 feedback forms were received by SSEN Transmission during or following the virtual consultation events.

5. CONSULTATION RESPONSES FROM STATUTORY AND NON-STATUTORY CONSULTEES

5.1 Introduction

5.1.1 **Table 5.1** sets out a summary of the feedback received for the grid connections from statutory and non-statutory consultees following the consultation period (October to December 2021). **Table 5.2** sets out a summary of the feedback received for the substation from statutory and non-statutory consultees following the consultation period (October to December 2021). A response to the feedback is also provided by SSEN Transmission in both Tables, together with confirmation of the action to be taken, where relevant.

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

- Aird and Loch Ness Ward Councillors;
- Badenoch & Strathspey Ward Councillors;
- CAA – Airspace;
- Caol and Mallaig Ward Councillors;
- Civil Aviation Authority (CAA);
- Dell Estate;
- ECU;
- Fisheries Management Scotland;
- Fort Augustus & Glenmoriston Community Company;
- Glengarry Community Council;
- Glengarry Community Woodlands and Laggan Forest Trust (LFT);
- Glengarry Trust;
- Inverness South Ward Councillors;
- John Muir Trust;
- Laggan Community Council;
- Mountaineering Scotland;
- Ness Fishery Board;
- RSPB;
- Scottish Forestry;
- Scottish Wildlife Trust;
- Scotways;
- Spean Bridge, Roy Bridge and Achnacarry Community Council;
- Spey Fisheries Board;
- Strathdearn Community Council;
- Stratherrick and Foyers Community Council;
- Stratherrick and Foyers Community Trust; and
- SWLG.

Table 5.1: Statutory and Non-Statutory Consultee Feedback on Grid Connections

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Statutory		
Historic Environment Scotland (HES)	The closest scheduled monument to the Melgarve Cluster of projects is SM 6129 Corrieyairack Pass, military road, Melgarve to Allt Ruadh. Historic Environment Scotland does not consider that the preferred route options for each wind farm are likely to have a significant adverse impact on this scheduled monument or any other nationally important heritage assets.	Noted.
	Detailed guidance on the application of national policy is set out in our 'Managing Change in the Historic Environment' series.	Noted.
NatureScot	HwLDP Policy 57 considers impacts on natural, built and cultural heritage designations and features. All development will be assessed taking into account the level of importance and type of heritage features, the form and scale of development and any impact on the feature and its setting. Of particular relevance are those landscape and other natural, built and cultural heritage features in proximity to the proposal identified in the constraint's maps provided. Further information on the designated sites noted below, including their protected features and conservation objectives, can be found on SiteLink. Avoiding direct and indirect impacts to protected areas should be a key consideration in the route selection process. Assessments should consider any impacts from the proposal on its own, and cumulatively with other plans or projects affecting these protected areas.	Noted. The route selection process has sought to identify preferred routes likely to have the least adverse impact on natural, built and cultural heritage features, on balance with other environmental considerations. Natural Heritage will be considered further during alignment optioneering to avoid sensitive features where possible. Natural Heritage will also be considered for EIA Screening and where required the EIA/EA for the individual connections will include full environmental assessments, including cumulative impacts (if EIA Development), and, where appropriate, propose mitigation measures to further reduce potential adverse impacts.
	Ecological concerns of international importance relevant to the development include, but is not exclusive to, the designated features in the: River Spey Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), as well as other Special Protection Areas (SPAs) and underpinning SSSIs. The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") apply.	Noted. These ecological sites of international importance have been identified by studies carried out to date and will continue to be factored into environmental assessments going forward.
	The River Spey Special Area of Conservation (SAC) lies to the south of the route option corridor and close to the connection point at Melgarve. The site is protected for salmon, freshwater pearl mussel, sea lamprey and otter, all of which could be adversely affected by release of silt or pollutants to the SAC or watercourses connected to it. Any future proposal would require a high standard of pollution	Pollution prevention and silt control measures will be considered as part of EIA/EA and appropriate mitigation measures proposed. Otter surveys will be carried out for the River Spey SAC. Potential impacts on Otters and Freshwater Pearl Mussel will be considered as part of ecology assessments as the project develops.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>prevention and silt control measures to ensure water quality is maintained. As greater ground disturbance may be predicted from underground connections these aspects of the proposals would require particular care.</p> <p>NatureScot recommends that an otter survey is undertaken in suitable areas of habitat within 200m of the proposals, in accordance with our guidance.</p> <p>NatureScot also recommends further consideration of freshwater pearl mussels in line with their guidance.</p>	
	<p>NatureScot advises that any future application includes sufficient information to inform a Habitats Regulations Appraisal (HRA) for the River Spey SAC. There is potential for a likely significant effect, most likely through release of silt and pollutants during construction, from any of the proposed options. Where there is a likely significant effect on a European site permitted development rights are suspended.</p>	<p>A Habitat Regulations Appraisal will be carried out for the River Spey.</p>
	<p>The Conservation Advice Package for the River Spey SAC has recently been published and will provide useful background information. It is available on SiteLink.</p>	<p>Noted. The Conservation Advice Package will be reviewed as part of environmental assessments.</p>
	<p>Sections of the route options for Cloiche and Dell are around 3km east of the Loch Knockie and nearby Lochs SPA which is protected for breeding Slavonian grebe. We recommend assessment of collision risk through survey work and desk study of known Slavonian grebe breeding sites in order that likely flight lines can be established. This information is available from the RSPB.</p>	<p>Data will be requested from RSPB and collision risk assessment for breeding Slavonian grebe carried out at EIA/EA stage.</p>
	<p>The Creag Meagaidh SPA is protected for breeding dotterel. Should dotterel be recorded during survey work connectivity with this site and the need for a HRA should be considered.</p>	<p>Noted. In the event that dotterel are recorded the need for HRA will be reviewed.</p>
	<p>The Monadhliath SAC and Creag Meagaidh SAC sites are protected for upland habitats. On the basis of existing information, it appears unlikely that they would be affected by the proposals. We would however look to any future application to confirm this or provide more detailed assessment.</p>	<p>Noted. Potential impacts on the noted designated natural heritage sites will be assessed as part of EIA/EA.</p>
	<p>The Glendoe Lochans SSSI underpins the Loch Knockie and nearby Lochs SPA and is protected for breeding common scoter and Slavonian grebe. For common scoter, we recommend an assessment of potential impacts through survey and desk study assessment.</p>	<p>Potential impacts on common scoter will be assessed using new ornithology survey data from current surveys and supported by desk based information.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>The Monadhliath and Creag Meagaidh SSSIs are protected for a range of upland features. On the basis of existing information, it appears unlikely that they would be affected by the proposal. We would however look to any future application to confirm this or provide more detailed assessment.</p>	<p>Noted. Potential impacts on the noted designated natural heritage site will be assessed as part of EIA/EA.</p>
	<p>NatureScot will likely advise further regarding ecological concerns and HRA considerations. If an Appropriate Assessment is likely to be required and based on NatureScot's advice, the Planning Authority would encourage the applicant to provide a Shadow Habitats Regulation Appraisal and Appropriate Assessment with their application.</p>	<p>Noted. Further consultation will be undertaken as required with NatureScot regarding ecological concerns and HRA considerations, as further information becomes available from site surveys, and as the project design develops.</p>
	<p>NatureScot's advice on any future proposal will be focused on issues they consider may be of national interest, in this case being the effects on the Special Landscape Qualities (SLQs) of the Cairngorms National Park and on Wild Land Area (WLA) 19 - Braeroy - Glenshirra - Creag Meagaidh (which lies around 1km to the south at the closest point) and WLA 20 - Monadhliath (which lies around 4.5km to the east). Issues around the National Park and Wild Land Areas have been previously discussed in relation to nearby wind farm proposals in this area and may provide helpful background to the applicants.</p>	<p>Noted. The discussions related to the CNP and WLAs carried out previously for the wind farms will be reviewed to help inform the LVIAs to be included in the EIA/EA Reports.</p>
	<p>At this stage NatureScot has not seen any supporting landscape and visual assessment material such as ZTVs or visualisations. NatureScot therefore recommends that the choice of route and connection type is informed by further assessment and would be pleased to provide more detailed comments once further supporting information is available.</p>	<p>Full LVIAs will be carried out as part of the EIA for each development and supporting information, including ZTV figures and visualisations, included with the EIA/EA Reports. Landscape and visual impacts will be considered further as part of the alignment selection stage, which will seek to select alignments with minimal potential impacts on the landscape and visual receptors in the vicinity, on balance with other environmental considerations. Further consultation will be sought with NatureScot following appraisal of alignment options.</p>
	<p>NatureScot advises that the route selection process and any future application considers the effects of the proposed development on the Cairngorms National Park, on its own and cumulatively, making reference to the Special Landscape Qualities and following the draft 'Guidance for Assessing the Effects on Special Landscape Qualities' (2018). The consultation document includes a list of SLQs of potential relevance to the proposed development in Table 5.1 and NatureScot would</p>	<p>The special qualities of the CNP have been factored into the route selection process and will be considered at alignment selection stage. Potential impacts will be fully assessed as part of LVIAs at EIA/EA stage. Further consultation will be sought with NatureScot following appraisal of alignment options.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>be pleased to offer more detailed comment on the scope of assessment once further supporting information is available.</p>	
	<p>NatureScot recommends that a Wild Land Assessment is carried out to assess the effects of the proposal, on its own and cumulatively, on the special qualities of WLA 19 and 20 in accordance with their published guidance. NatureScot notes (Table 5.1 of the consultation report) that the applicants currently propose to scope in all of the WLA 19 and 20 qualities for further assessment. NatureScot would be pleased to offer more detailed comment on the scope of assessment once further supporting information is available.</p>	<p>The potential impacts of the development on the nearby WLAs will be considered either within a dedicated Wild Land Assessment or as part of the LVIA for each development. Further consultation will be carried out with NatureScot to confirm the scope and methodology to be employed.</p>
	<p>There appear to be opportunities to rationalise the grid connection infrastructure in this area and NatureScot recommend this is given further consideration as the proposals progress.</p>	<p>The potential to rationalise grid infrastructure will be given further consideration as the project progresses against other environmental, engineering and project factors.</p>
	<p>NatureScot has a casework agreement with the National Park Authority which states how they will each advise you on the implications of any proposal. In line with this, they will provide advice on assessment requirements for the National Park designation. The proposed grid connection route is around 4.5km west of the National Park and there is potential for visibility from the Park. NatureScot advises that choice of route and any future application considers the effect of the proposals on the National Park, making reference to the Special Landscape Qualities.</p>	<p>Potential impacts of the development on the CNP will be fully assessed as part of LVIA's at EIA/EA stage, including reference to its Special Landscape Qualities.</p>
	<p>NatureScot recommends that the route selection process is informed by habitat survey, hydrological assessment and peat probing results, so that it avoids direct and indirect impacts to priority peatland habitats. Where impacts cannot be avoided, they should be minimised. NatureScot would expect any future application to include mapped information on peatland habitats to NVC level together with a detailed description of current condition. Habitat loss and damage, both direct and indirect, should be determined and suitable mitigation and/or restoration measures presented in peat and habitat management plans.</p>	<p>Habitat surveys, hydrological walkover surveys and peat probing surveys will be carried out as part of alignment optioneering and EIA/EA to inform the impact assessments. Peatland habitats will be mapped and displayed on figures accompanying the EIA Reports. Habitat loss and damage will be quantified and appropriate mitigation and/or restoration measures proposed.</p>
	<p>NatureScot advises that peatland surveys are carried out in accordance with the Peatland Survey 2017 "Guidance on Developments on Peatland". A Peat Slide Risk Assessment may also be required and should follow the latest 2017 guidance "Peat</p>	<p>Peatland surveys will be carried out in line with the noted guidance, and a Peat Landslide Hazard Risk Assessment will be carried out both as part of alignment options and EIA/EA.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>landslide hazard and risk assessments: best practice guide for proposed electricity generation developments".</p>	
	<p>NatureScot recommends that the route selection process is informed by survey and assessment and would be pleased to provide more detailed comments once further information is available. The supporting information notes the likely presence of a number of Annex 1 habitat types within the route corridor, including blanket bog and alpine heath. NatureScot advises that the route selection process is informed by survey and assessment, so that the development avoids, where possible, sensitive habitats such as blanket bog and alpine/montane habitats. Where this is not possible, suitable restoration and/or compensation measures should be proposed. Habitat loss and damage, both direct and indirect, should be determined and suitable mitigation and/or restoration measures presented in a Habitat Management Plan. NatureScot advises that impacts to semi-natural woodland are avoided where possible. If the proposals include woodland removal, we advise the applicants to liaise with Scottish Forestry at the earliest opportunity to discuss the forestry removal policy and any requirement for compensatory planting.</p>	<p>The development design will seek to avoid blanket bog and alpine heath habitats as far as possible; however, given the extensive coverage of these habitats within the Corridor it will not be possible to avoid them entirely. Further assessment and site surveys will inform the optimum alignments to minimise adverse impacts on these habitats. Appropriate mitigation and site restoration measures will be proposed, where appropriate, and presented in a Habitat Management Plan. Compensatory planting requirements will be discussed with Scottish Forestry and THC Planning Authority.</p>
	<p>HwLDP Policy 58 Protected Species, given the rural nature of the locality, close by native woodland and watercourses the area around the site is likely to be home to or foraging ground for several protected species. Appropriate assessments should be undertaken to ensure suitable mitigation is provided to avoid disturbance impacts. The supporting information notes that water vole and otter are likely to be present. Suitable habitat may also exist for pine marten, red squirrel, badger and wildcat. The applicants would be expected to follow the protected species advice on our website during survey and assessment for this proposal. The advice contains detailed advice on protected species survey methods (including timing of surveys, survey area and shelf- life), Species Protection Plans, mitigation and licence applications.</p>	<p>Appropriate assessments will be undertaken as part of the EIA/EA reports to ensure suitable mitigation is provided to avoid disturbance impacts on protected species, such as water vole and otter, who are likely to inhabit or forage in the native woodland and watercourses in the areas around the site. Appropriate assessments in suitable habitat for pine marten, red squirrel, badger and wildcat will also be taken into account. NatureScot's protected species advice will be observed during survey and assessment for this proposal to help inform protected species survey methods (including timing of surveys, survey area and shelf- life), Species Protection Plans, mitigation and licence applications.</p>
	<p>Potential impacts to wider countryside birds should be assessed against the relevant Natural Heritage Zone (NHZ) population (NHZ10 Central Highlands for this proposal) following current guidance.</p>	<p>Potential impacts to wider countryside birds will be assessed in the EIA/EA reports against the relevant Natural Heritage Zone (NHZ) population (NHZ10 Central Highlands for this proposal) following current guidance.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>NatureScot recommends that the choice of route and connection type is informed by survey and assessment and would be pleased to provide more detailed comments as the proposals progress. Further advice on route selection, survey and assessment is provided in NatureScot's guidance "Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds".</p>	<p>The choice of route and connection type will be informed by survey and assessment. More detailed comments as the proposals progress will be sought from NatureScot by SSEN Transmission.</p> <p>NatureScot's guidance "Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds" will be consulted as the proposal progresses.</p>
	<p>As noted in the supporting information, the route options fall within the foraging ranges of golden eagle. The proposals have the potential to impact on the NHZ golden eagle population, both on their own and in combination with the other developments in the area. NatureScot recommends available information from other proposals in this area, survey and assessment are used to inform the route selection process so that it minimises potential impacts to golden eagles. Topography suggests that higher levels of flight activity might also be expected around the north-west of Route D1. NatureScot advises that GET (Golden Eagle Topographical) modelling is also used to help inform the likely use of the area and that this may help guide the route selection process.</p>	<p>Available information from other proposal's surveys and assessments in the areas where the route options fall within the foraging ranges of golden eagle will be used to inform the development design as it progresses. This will be carried out with the aim to minimise potential impacts to golden eagles.</p> <p>NatureScot's suggestion to use GET (Golden Eagle Topographical) modelling to help inform the likely use of the area and that this may help guide the route selection process has been noted.</p>
	<p>NatureScot advises that all bird survey work follows our guidance at: https://www.nature.scot/recommended-bird-survey-methods-inform-impact-assessment-onshore-windfarms. Once survey work is complete an assessment of potential impacts through habitat loss/change, disturbance and/or displacement, and collision risk to SPA and wider countryside bird populations will be required, both for the proposal on its own and in combination with other projects. Mitigation options should be considered as part of this process. The applicants are welcome to get in touch with NatureScot if they wish to discuss the scope of survey and assessment further.</p>	<p>Bird survey work will follow NatureScot guidance. The EIA/EA reports will show an assessment of potential impacts through habitat loss/change, disturbance and/or displacement, and collision risk to SPA and wider countryside bird populations will be produced. Mitigation options will be considered as part of this chapter.</p>
	<p>As noted in your bird survey consultation letter there will be a considerable amount of background information on the bird interest of this area. We recommend this is considered as part of the desk study and to help inform the scope of survey work.</p>	<p>The existing background information available from other developments nearby will be reviewed as part of desk studies.</p>
	<p>The VP and viewshed maps suggest that coverage is not quite complete, but we fully appreciate the difficulty in achieving this on such a large and undulating site with numerous route options. If there are gaps in the coverage of the final selected</p>	<p>Noted. Details will be provided as to how any gaps in coverage of the Proposed Route have not affected results and conclusions. Height bands will be used to inform collision risk assessment.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>route it is likely that you will have to demonstrate that this has not affected your results and conclusions in any future application. For VP surveys, presumably height bands for flight recording will reflect the potential collision risk from the power lines.</p>	
	<p>We note that there are three golden eagle territories close to the proposal site and that these are likely to be a key consideration. As per section 3.7.2 of our bird survey guidance we recommend coordination of surveys with the Highland Raptor Study Group to avoid duplication of effort and to minimise disturbance. If surveys are to be carried out the methods, including timing, should follow our bird survey guidance and references therein. An assessment of potential impacts of the proposal on the NHZ golden eagle population, both on its own and in combination with the other developments in the area, is likely to be required. We recommend that potential impacts to wider countryside birds are assessed against the relevant Natural Heritage Zone (NHZ) population (NHZ 10) following current guidance: https://www.nature.scot/doc/guidance-assessing-significance-impacts-bird-populations-onshore-wind-farms-do-not-affect-protected. We advise that GET (Golden Eagle Topographical) modelling is also used to help inform the likely use of the area and that this may help guide the route selection process. Our bird survey guidance is expected to be updated soon to reflect this advice, but in the meantime please see further info at: https://www.nature.scot/doc/naturescot-statement-modelling-support-assessment-forestry-and-wind-farm-impacts-golden-eagles.</p>	<p>Surveys will be coordinated with the Highland Raptor Study Group and follow NatureScot's bird survey guidance. Assessment of impacts on the NHZ golden eagle population will be included as part of EIA/EA. Use of GET modelling will be considered to inform selection of the Proposed Route.</p>
	<p>The proposal is close to the Glendoe Lochans SSSI, part of the Loch Knockie and nearby Lochs SPA. The SSSI is protected for breeding common scoter and Slavonian grebe. The SPA is also protected for grebe. In order to consider potential for collision risk, in addition to the survey work proposed, some theoretical assessment may be needed to account for the difficulty in detecting scoter and Slav grebe flights using standard survey methods. For Slavonian grebe we recommend a desk study to identify any known breeding sites in order to assess the potential for flights to cross the development site when moving between these areas. This data is available from the RSPB. For scoters we recommend a desk study of existing records and assessment of potential for flights to cross the development site, based on distribution of records, topography, etc.</p>	<p>Additional desk studies will be undertaken to account for the difficulties in detecting Slavonian grebe and common scoter during field surveys.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>For breeding raptors generally we note that targeted walkovers are proposed once breeding in a site is suspected following previous survey results or correspondence with the RSG. Depending on the age of previous data and how complete coverage is by the RSG additional suitable areas of habitat may also require survey. Methods should follow our guidance and references therein (e.g. Hardey et al 2009), with survey buffers as described in Table 1.6, Annex 1.</p>	<p>Methods for breeding raptor surveys will follow the noted guidance.</p>
	<p>Survey methods, including timing, for breeding divers should be informed by our bird survey guidance and references therein (e.g. Gilbert et al 1998). Standard diver survey methods, including focal point surveys if the birds are breeding, are recommended.</p>	<p>Methods for diver surveys will follow the noted guidance.</p>
	<p>In terms of the Moorland Breeding Bird Surveys, the recommended survey period is mid-April to early July, rather than late July as stated in the letter. I didn't pick up any information on survey area in the document – apologies if I missed this - guidance recommends surveys extend out to 500m either side of proposed limits of deviation of the route.</p>	<p>Moorland breeding bird surveys will be adjusted to finish in early July and will extend to 500m either side of the LoD of the alignments chosen.</p>
	<p>Once survey work is complete an assessment of potential impacts through habitat loss/change, disturbance and/or displacement, and collision risk to SPA and wider countryside bird populations is recommended, both for the proposal on its own and in combination with other projects. Mitigation options should be considered as part of this process.</p>	<p>The likely impacts of the proposals on habitat loss, disturbance and displacement, as well as collision risk, both on its own and cumulatively with other developments, will be assessed. Appropriate mitigation will be proposed where required.</p>
	<p>We recommend that the choice of route and connection type is informed by survey and assessment and would be pleased to provide more detailed comments as the proposals progress. Further advice on overhead line route selection, survey and assessment is provided in our guidance "Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds" at: https://www.nature.scot/guidance-assessment-and-mitigation-impacts-power-lines-and-guyed-meteorological-masts-birds.</p>	<p>Ongoing surveys and assessments will be used to refine the development design. Further consultation will be carried out with NatureScot as the project progresses and the noted guidance will be observed.</p>
<p>Scottish Environment Protection Agency (SEPA)</p>	<p>SEPA are generally content with the preferred route option as outlined in Figure 1 and are more interested in the location of the proposed infrastructure within the proposed corridor. There is already, or will be, an extensive network of tracks and previously disturbed areas within the corridors and development should be planned</p>	<p>Existing infrastructure will be utilised as far as practicable and SSEN Transmission will engage with the developers and operators of the wind farms within the vicinity to make best use of the existing development plan forms.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>to utilise these and avoid development elsewhere as much as possible. SSEN should work with the windfarm developers and operators so that infrastructure can be located within the existing development planforms as much as possible.</p>	
	<p>Between Dell and Cloiche substations SEPA suggests that corridor be reduced to the west so that it excludes area which are currently free from development. Similar comments apply for the corridor between Cloiche and Glenshero where the area to the west if Sidhean Dudh na Cloiche Baine should be avoided. SEPA agrees that making use of the corridor of the existing track directly north of Melgarve substation is the best option and asks that the developer try and ensure that any new proposed development is within the corridor which has already been disturbed by the previous works. There is much environmental baseline data available for the corridor area and SEPA requests that the developer works with the windfarm developers to gain access to the information they have already collected and use that as part of the overall assessment.</p>	<p>The Corridor will be reviewed in light of comments to limit egress into currently undisturbed areas; however, it should be noted that the Corridor acts as an initial 'area of search' for route options and does not factor into the next stage of development (alignment options selection). Instead, the route options form the area of search for alignment options. The development will make best practicable use of the area of the existing track and underground cable. Existing environmental data has already been sought from the wind farm operators and developers and factored into the development design to date.</p>
	<p>The application should be supported by a detailed peat survey report and calculations showing how much peat will be disturbed by the different elements of the development (broken down into acrotelmic and catotelmic layer) and how and where disturbed peat will be reused on site or elsewhere.</p>	<p>A peat survey will be carried out for the developments and will be used to inform a Peat Landslide Hazard Risk Assessment (PLHRA). The surveys and PLHRA will be used to inform assessments within the EIA/EA Reports and a Stage 1 Peat Management Plan will be included within the EIA/EA Report as a Technical Appendix.</p>
	<p>The finalised layout plans should be demonstrated to (1) avoid the areas of deepest peat and best quality habitat (2) keep the footprint of each aspect of the development as small as possible and (3) use construction methods, such as floating or piling to reduce impact on peat as much as possible. Specific care will need to be taken to determine the location of construction works which if poorly located and designed could disturb more peat than the final development.</p>	<p>The EIA/EA Reports will include information on how the developments avoid deep peat and best quality habitats, minimise development footprints and the construction methods to be used.</p>
	<p>Additional peatland restoration should be proposed to mitigate the impact the development will have on the Glenshero wind farm habitat management plan area to ensure there is no loss in overall mitigation/enhancement. SEPA also encourages the developer to consider whether there are other areas of the overall site that could be restored as a part of these works.</p>	<p>Peatland restoration measures will be considered as part of mitigation proposals within the EIA/EA and these will be developed with consideration of the Glenshero Wind Farm habitat management plan area.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>As noted in the supporting information, the Carbon and Peatland map 2016 indicates extensive areas of Class 1 and Class 2 peatland within the route options corridor - particularly across the higher altitude plateaux areas in the north. Habitat maps also suggest significant areas of blanket bog within the route corridor. Some of these areas are at high altitude and therefore particularly sensitive.</p>	<p>Noted. Areas of Class 1 and 2 peat soils were identified during route appraisals and mapped to inform route selection.</p>
	<p>Development or land raising within any flood plain should be avoided and proposals should generally follow SEPA's Standing Advice for Flood Risk. Should any permanent infrastructure be located within close proximity to a watercourse a Flood Risk Assessment should be submitted to demonstrate that the development is not at risk from flooding and will not increase flood risk elsewhere. SEPA's Technical flood risk guidance for stakeholders outlines the information require to be submitted as part of a Flood Risk Assessment.</p>	<p>Flood plains will be avoided as far as is practicable by the development. Where areas of flood risk cannot be avoided, a Flood Risk Assessment will be provided in line with SEPA's noted guidance.</p>
	<p>Small watercourse crossings should be oversized and larger scale watercourse crossings should be demonstrated to be adequately designed to accommodate the 1 in 200 year flow (including an allowance for climate change and freeboard) to avoid increasing the risk of flooding, or information provided to justify smaller structures. Appropriate riparian buffers should be observed. Storage of materials within this area during construction is not permitted.</p>	<p>Any watercourse crossings will be designed to accommodate 1 in 200 year flow rates. Appropriate buffers will be observed as part of the development design and materials will not be stored within these areas.</p>
	<p>In accordance with SEPA's Flood Risk and Land Use Vulnerability guidance, this project falls under the category, 'Essential Infrastructure'. Under this guidance, it should be shown that the infrastructure will remain operational up to a 1 in 200 year return period storm event.</p>	<p>The EIA reports will include details of the development's ability to weather 1 in 200 year storm events.</p>
	<p>The site layout must be designed to avoid impacts upon the water environment where every possible. Including significant buffers to watercourses within the design will help protect watercourses and avoid the need to consider flood risk. Any permanent watercourse crossings should be oversized bottomless arched culverts or traditional style bridges; temporary crossing, depending on scale, can be closed culverts or bailey bridges which both tend to be easier to remove.</p>	<p>Flood plains will be avoided as far as is practicable by the development. Where areas of flood risk cannot be avoided, a Flood Risk Assessment will be provided in line with SEPA's guidance. Watercourse crossings will be appropriately designed.</p>
	<p>Ground Water Dependant Terrestrial Ecosystems An NVC survey should be carried out of the sites and within 250m from any proposed infrastructure. The development should avoid direct impacts on any rare</p>	<p>An NVC survey will be undertaken with the assessment will be included within the EIA/EA Report.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>groundwater dependant habitats and protect their water supply. If relevant the mitigation measures required to protect surrounding GWDTE habitats from the impacts of development (such as drying out) should be outlined.</p> <p>Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:</p> <p>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 water abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.</p> <p>b) If the above minimum buffers cannot be achieved, as is the case here, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA is likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.</p>	<p>Plans showing locations of groundwater abstractions in relation to proposed works will be included with the EIA/EA reports along with a risk assessment where these separation distances cannot be achieved.</p>
<p>The Highland Council (THC)</p>	<p>Whilst the Council is supportive of renewable energy developments in principle, this must be balanced against the environmental impact of development. The approach for route selection in a systematic manner considering the advantages and constraints of the preferred routing is encouraging. That said, given the limited available information on precise cable routing, number of towers coupled with cumulative corridor widths, there remains concern with direct and indirect impacts on a range of landscape designations and sensitive areas in proximity of the proposed development.</p> <p>To mitigate the potential impacts on the environment, consideration should be given to utilise previously disturbed areas and existing access tracks wherever possible. To achieve this, as per comments received from SEPA, NatureScot and THC Development Plans Team, agreement is required for maximising the sharing of infrastructure with individual wind farm developers and operators. This must be pursued to utilise and accommodate infrastructure within the existing developments wherever possible.</p> <p>Concerns remain in relation to the potential significant landscape and visual impacts which may arise as a result of this cumulative connection corridor. Such impacts</p>	<p>Noted. Further information in relation to alignments, number of towers and cumulative corridor widths will be provided as the design of the developments progress.</p> <p>Existing infrastructure corridors and sharing of infrastructure will be utilised as far as is reasonably practicable, on balance with other environmental, engineering and project constraints.</p> <p>The direct and indirect impacts of the development on the noted sites will be fully explored within the EIA/EA report for each</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>may arise at several key locations including the Cairngorm National Park, Wild Land Area (WLA) 19 - Braeroy - Glenshirra - Creag Meagaidh and WLA 20 – Monadhliath. As indicated by NatureScot, further assessment is required with the choice of route and connection type in term of:</p> <ul style="list-style-type: none"> • the direct and indirect impacts of the proposal on protected sites including: European sites, SAC, SPA, SSSI and Cairngorms National Park; • the effects on the Cairngorms National Park, on its own and cumulatively, making reference to the Special Landscape Qualities (SLQs) and following the draft 'Guidance for Assessing the Effects on Special Landscape Qualities' (2018); • a Wild Land Assessment to assess the effects of the proposal, on its own and cumulatively, on the special qualities of WLA19 and WLA 20; • impacts of the proposed development on ornithology and protected species, including wider countryside birds including the NHZ golden eagle population, both on their own and in combination with the other developments, through GET (Golden Eagle Topographical) modelling; • the direct and indirect impacts of route selection corridor on priority peatland habitats; and • impact on sensitive habitats such as blanket bog and alpine/montane habitats. 	<p>connection, as appropriate. Assessments will be carried out in line with current guidance and best practice.</p>
	<p>Given that the existing Stronelaig wind farm connection is underground, SSEN should revisit the rationale for this connection not being above ground, and if this decision was based upon not only the financial subsidies available at that time and project delivery timescales, but also to overcome any technical or environmental constraints such as ornithology as well as landscape and visual impacts. Previous environmental mitigation secured through undergrounding this existing connection should not be lost. SSEN will therefore need to re-examine the need for any overhead line option considered and determine if this could alternatively be undergrounded within one corridor, and ideally this being the existing Stronelaig corridor. Failing that, should any OHL ultimately be required, this should look to be rationalised down to a single line for a long a section as possible, with the decision for an overhead line and its alignment being determined by environmental factors, rather than potentially being driven by project cost, land ownership constraint or disruption caused to the build out or operation of wind farms.</p>	<p>Noted. The design of the development is ongoing and under review as part of the various consultation responses received. The development design will be refined as part of the alignment selection stage and the rationale for OHL vs UGC and single vs double circuit towers revisited during the alignment selection process.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>There appears to be opportunities to further rationalise the grid connection infrastructure in this area, which would help remove the need for a vast corridor of ground disturbance. Some of the issues and challenges raised above have already been highlighted in the history of the three windfarm projects in this area and there is extensive environmental baseline data available to draw upon which should help when undertaking the accompanying environmental assessment work. In proceeding towards any overhead line Section 37 application, detailed information and comprehensive assessment will be required to establish the significance of any impacts, and you are encouraged throughout the process to explain the design iterations and how they have responded to assessment of impacts.</p>	<p>The opportunity to rationalise the projects will be explored as part of the Alignment Options process.</p> <p>The significance of all direct and indirect impacts likely to result from the development will be set out within the EIA/EA Reports, as appropriate. The alternative options and design iterations will be set out within the EIA/EA Reports, and existing environmental information from nearby projects will be utilised as far as is practicable.</p>
	<p>The assessment should also clearly set out the benefits of the proposed development and you should demonstrate how, in SSEN's view as the applicant, any significant impacts of the development would be outweighed by the collective benefits of the proposed development.</p>	<p>The benefits of the development will be set out within the EIA/EA Reports, along with a discussion of any significant environmental impacts outweighed by these benefits.</p>
	<p>Based on the information presented to date, the principle of the connects is accepted but further work is required to demonstrate that the individual and cumulative landscape and visual effects are acceptable. It would however appear possible to come forward with a rationalised proposal which would be viewed more favourably, taking the advice given in this pre-application advice pack into consideration. The acceptability or otherwise of any overhead line connection must be borne out of further environmental assessment and it is too early in the process to determine the acceptability of this without sight of any landscape or visual material. The Planning Authority would therefore happy to advise further should an overhead line option still be ultimately required, with the proposals being presented at a more advanced stage.</p>	<p>Full landscape and visual impact assessments (LVIA) will be included within the EIA/EA Reports. Further consultation will be carried out with the Planning Authority in regard to these LVIAs and the potential to rationalise overhead lines.</p>
	<p>You are advised that the following consent(s) will be required for the proposed development:</p> <ul style="list-style-type: none"> • Section 37 Consent • Controlled Activities Regulations (CAR) Licence 	<p>Noted. Applications for Section 37 consent will be supported by environmental reports. CAR licences will be sought separately.</p>
	<p>Highland-wide Local Development Plan (HwLDP) (2012) - Applicable Policies Policy 28 - Sustainable Design Policy 29 - Design Quality & Place-making</p>	<p>It is noted that the development will be assessed against the applicable policies of the HwLDP). A Planning Statement will be</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	Policy 30 - Physical Constraints Policy 31 - Developer Contributions Policy 36 - Development in the Wider Countryside Policy 51 - Trees and Development Policy 52 - Principle of Development in Woodland Policy 55 - Peat and Soils Policy 56 - Travel Policy 57 - Natural, Built and Cultural Heritage Policy 58 - Protected Species Policy 59 - Other important Species Policy 60 - Other Importance Habitats Policy 61 - Landscape Policy 63 - Water Environment Policy 64 - Flood Risk Policy 66 - Surface Water Drainage Policy 69 - Electricity Transmission Infrastructure Policy 72 - Pollution Policy 74 - Green Networks Policy 77 - Public Access	produced to accompany the s37 application that will consider all applicable planning policy.
	No site-specific policies or land use allocations apply for the Inner Moray Firth Local Development Plan (INFLDP) 2015 or the West Highlands and Islands Local Development Plan (WHILDP) 2019.	Noted.
	Highland Council Supplementary Guidance - Applicable Policies Developer Contributions (November 2018) Flood Risk & Drainage Impact Assessment (Jan 2013) Physical Constraints (March 2013) Roads and Transport Guidelines for New Developments (May 2013) Sustainable Design Guide (Jan 2013) Highland Historic Environment Strategy (Jan 2013) Highland's Statutorily Protected Species (March 2013) Trees, Woodlands and Development (Jan 2013) Green Networks (Jan 2013) Highland Renewable Energy Strategy & Planning Guidelines (May 2006) Onshore Wind Energy (Nov 2016)	It is noted that the development will be assessed against the applicable policies of THC's supplementary guidance documents.



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>Scottish Planning Policy and Guidance - Applicable Policies Scottish Planning Policy (Jun 2014 and as amended Dec 2020) National Planning Framework 3, NPF3 (Jun 2014) and consultative draft NPF4 (Nov 2021) Onshore Wind Position Statement Refresh 2021, consultative draft (Oct 2021) Scotland's Energy Strategy Position Statement (Mar 2021) Energy Efficient Scotland Route Map (May 2018) Scottish Energy Strategy (Dec 2017) 2020 Routemap for Renewable Energy (Jun 2011) PAN 1/2013 – Environmental Impact Assessment (Aug 2013) PAN 1/2021 – Planning and Noise (Mar 2011) PAN 60 – Planning for Natural Heritage (Jan 2008) PAN 68 – Design Statements (Aug 2003) Historic Environment Policy for Scotland (Apr 2019) Highland Forest and Woodland Strategy (Nov 2018 / 2006)</p>	<p>It is noted that the development will be assessed against the applicable policies of Scottish Planning Policy and Guidance. A Planning Statement will be produced to accompany the s37 application that will consider all applicable planning policy.</p>
	<p>The Development Plan comprises the HwLDP, IMFLDP and WHILDP, plus relevant supplementary guidance. This is due to the proposed connection routes crosses the Council's Local Development Plan boundaries (refer to the enclosed Plan Area Boundaries Map).</p>	<p>Noted.</p>
	<p>HwLDP was adopted in 2012 and sets out planning policies applicable for the whole Highland Council area. HwLDP contains the key policies relevant to this proposal, the most relevant are described in this response, but others may apply in the determination of a future application. The Council began a review of HwLDP, with the publication of the Main Issues Report in September 2015 and subsequent consideration of comments in 2016. In December 2017 the Scottish Government published a Planning Bill outlining potential changes to the Scottish planning system. The Council took the decision to halt the HwLDP Review until more was known about the changes. The Planning (Scotland) Act 2019 was subsequently enacted. Further details of the new arrangements for Development Plans are emerging, together with the proposed transitional arrangements. This means that we now expect to take forward review of the HwLDP under the new arrangements for Local Development Plans, with formal work anticipated to start in</p>	<p>Noted.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>summer 2022. Applicants are advised to monitor the annual development plans newsletter as this provides a timetable of work on the Highland development plan; the latest newsletter was published in March 2021.</p>	
	<p>In terms of IMFLDP, this plan is currently under review and will reach 'Proposed Plan' stage by March 2022. Therefore, dependant on timing for progression it is likely this plan will be a material consideration by the time of applications.</p>	<p>Noted.</p>
	<p>The Highland Council Area Local Development Plans focus is on the regional and settlement strategies within their boundaries and identify specific site allocations and as such, much of the content of IMFLDP and WHILDLP is not directly relevant to this scheme. However, certain aspects of the strategies for the local area and settlements may help to inform plans for community engagement. These plans also define Settlement Development Areas (SDAs) and confirms boundaries (including any refinements) of the Special Landscape Areas (SLAs) within the plan area.</p>	<p>The IMFLDP and WHILDLP will be reviewed as part of organisation of community engagement events.</p>
	<p>The Cairngorm National Park boundary runs adjacent to the pre-application site boundary a relatively short distance to the east. Within the CNP boundary, Wild Land Areas exist and the CNPA regard the entire park area as a sensitive landscape, for which they have developed a 'Landscape Toolkit' to consider and review the impact the development could have on the wider area.</p>	<p>Noted.</p>
	<p>Since the pre-application meeting, Draft National Planning Framework 4 (NPF4) has been laid in Parliament and published for consultation running until 31 March 2022. The Council has begun considering the Draft and will prepare and submit its response to Scottish Government.</p> <p>Depending upon the timescale for submission and anticipated timing of determination of an application for this development, should you proceed with the proposals, NPF4 may have been finalised and adopted by then and be part of the 'adopted' Development Plan context for consideration. Until such time as NPF4 receives final approval, NPF3 and SPP (both 2014) remain as current national planning policy and material considerations in decision-making. Draft NPF4 may also be a material consideration; the Council has asked Scottish Government whether that is their expectation and, if so, whether Scottish Government has any broad guidance on its application as a material consideration – at the time of writing, a response is awaited.</p>	<p>Noted. Should NPF4 be a material planning consideration by the time applications for consent are made it is understood that they will be assessed against its policies.</p> <p>Should NPF4 still be in draft form at the time applications for consent are made, it will be considered in the planning statement as appropriate.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>HwLDP Policy 69 (Electricity Transmission Infrastructure) highlights the strategic importance the Highlands will play in generating and transmitting electricity from areas of generation to areas of consumption. Given the size and scale of this proposal, it would likely be considered of significant importance and therefore subject to final site selection, form and design of the connections, it is considered likely that general support for the development would be forthcoming under this policy, subject to balancing and mitigating any detrimental impacts the scheme might create, this includes areas of natural, built and cultural heritage features.</p>	<p>Noted.</p>
	<p>The Council recognises the importance of the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, as the legislative tool for addressing Scotland's Climate and Ecological Emergency, which the Council committed to under its own Climate and Ecological Emergency declaration in May 2019. Furthermore, given Highland's land mass and geography make up and renewable energy resources, it is accepted that the area has enormous potential to significantly contribute to the production and transmission of renewable energy. However, this commitment has to be taken in balance along with all other considerations of a particular site. It is appreciated that the proposal would add to the country's ability to transmit renewable energy from generation source; however, development should still be located, sited and designed appropriately.</p>	<p>Noted.</p>
	<p>HwLDP Policy 29 Design Quality and Place Making policy requires new development to be designed to make a positive contribution to the architectural and visual quality of the area. Furthermore, development proposals must demonstrate sensitivity and respect towards the local distinctiveness of the landscape, architecture, design and layouts of their proposals. HwLDP Policy 36 (Development in the Wider Countryside) also supports development in the countryside providing they are acceptable in terms of siting and design and respect the character of the area.</p>	<p>Noted. The design of the development will seek to accord with the principles of Policy 29, supported by LVIA to assess likely impacts on the landscape character and recommend any mitigation measures which may be required.</p>
	<p>Whilst no application will be forthcoming for the overhead connections, SSEN are encouraged to still provide a Design and Access Statement. This should outline the design principles and concepts that have been applied to the development and:</p> <ul style="list-style-type: none"> • explain the policy or approach adopted as to design and how any policies relating to design in the development plan have been taken into account; • describe the steps taken to appraise the context of the development and 	<p>Noted. SSEN Transmission will consider preparation of a dedicated Design and Access Statement or whether the information required can be appropriately presented within the EIA/EA Reports.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>demonstrates how the design of the development takes that context into account; and</p> <ul style="list-style-type: none"> state what, if any, consultation has been undertaken on issues relating to the design principles and concepts that have been applied to the development; and what account has been taken of the outcome of any such consultation. 	
	<p>NatureScot will likely advise further regarding ecological concerns and HRA considerations. If an Appropriate Assessment is likely to be required and based on NatureScot's advice, the Planning Authority would encourage the applicant to provide a Shadow Habitats Regulation Appraisal and Appropriate Assessment with their application.</p>	<p>Noted. A HRA will be produced for the River Spey SAC based on earlier comments, however SSEN Transmission will review further consultation responses from NatureScot on any additional HRA works required.</p>
	<p>The Council's Landscape Officer advises that the process which has been carried out so far seems rational and well considered. The outcome at this stage is the definition of a broad corridor within which the grid connections could be established with the minimum detriment to environmental and conservation concerns and within achievable engineering parameters.</p>	<p>Noted.</p>
	<p>The split between an underground cable solution for Glenshero and overhead line solutions for Dell and Cloiche, appears to leave the landscape open to the combined effects of the two different connection approaches in a way which seems to undermine the works that has been done to identify corridors of lowest possible impacts. If there is a requirement for overhead lines coming down from the cluster to the substation, disrupting the ground surface to underground another set seems to limit the benefit gained from the undergrounding.</p> <p>While it is understood that the applicants do not have a free hand in all aspects of the provision, the final proposals need to make clear how accommodating a range of solutions for different customers within such a restricted area is ultimately in the best interest of the landscape and visual impacts.</p>	<p>The potential to rationalise grid infrastructure will be given further consideration as the project progresses against other environmental, engineering and project factors. If this cannot be achieved, justification will be provided as part of the EIA/EA Reports.</p>
	<p>The landscape and visual impacts are key issues which will inform our position in relation to this proposal. Despite this proposal not being a wind farm, visualisations provided for major or national scale developments are expected to accord with the Council's latest Visualisation Standards for Wind Energy Developments and are subject an independent verification check upon receipt. Assessments should cover impacts of all elements of the development, not just the overhead elements, but also</p>	<p>Full LVIA's will be carried out as part of the EIA/EA for each development and these will include visualisations of the developments in line with current THC guidance, consideration of the landscape and visual impacts of ancillary development, and potential impacts on key views. Previously selected visualisation</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>any ancillary infrastructure including any site access works. Applicants are strongly encouraged to provide information on all aspects of their proposal as far as possible at application stage in order that the Council has the fullest understanding of the scheme. In considering nearby receptors, any affected key views identified in the Onshore Wind Energy Supplementary Guidance Sensitivity Appraisal covering the Loch Ness Study Area to the north of the site should be considered, along with LVIAs for the recent wind farm proposals. It would also be helpful to review the information previously prepared and assessed for the original substation. For consistency, previously selected viewpoints should be re-used where these remain appropriate, and the finalised proposed viewpoints should be agreed through further consultation with the Planning Authority and NatureScot.</p>	<p>locations will be re-used, where practicable to do so, and all locations will be agreed with THC as part of further consultation.</p>
	<p>The proposed electricity connection preferred routes form a broad corridor which crosses predominantly open ground. There is a commercial forestry plantation to the northeast of Melgarve substation and this appears to be the only significant woodland area within the indicative red line boundary. There are also patches of the woodland listed in the Native Woodland Survey of Scotland as pole stage pine wood.</p>	<p>Noted.</p>
	<p>HwLDP Policy 51 (Trees and Development) of the Highland wide Local Development Plan states that 'The Council will support development which promotes significant protection to existing hedges, trees and woodlands on and around development sites. The acceptable developable area of a site is influenced by tree impact, and adequate separation distances will be required between established trees and any new development.'</p>	<p>Noted.</p>
	<p>HwLDP Policy 52 (Principle of Development in Woodland) of the Highland wide Local Development Plan states that 'The applicant is expected to demonstrate the need to develop a wooded site and to show that the site has capacity to accommodate the development. The Council will maintain a strong presumption in favour of protecting woodland resources. Development proposals will only be supported where they offer clear and significant public benefit. Where this involves woodland removal, compensatory planting will usually be required.'</p>	<p>Noted.</p>
	<p>If the amount of woodland that would be permanently lost in the development of the proposals is greater than 0.1ha then the Scottish Government's policy on the Control</p>	<p>Noted.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>of Woodland Removal will apply. Section 218 of Scottish Planning Policy (June 2014) states that the Scottish Government's Control of Woodland Removal Policy includes a presumption in favour of protecting woodland. Removal should only be permitted where it would achieve significant and clearly defined additional public benefits.</p>	
	<p>SSEN have provided Figure 12 - Melgarve Corridor Forest and Woodland drawing which shows the route options and the presence of existing woodland. The Forestry Officer confirms that the corridor through D1 and C3 would not appear to have any adverse impact on woodland and the G1 corridor would appear to be wide enough to pass to the west of the existing woodland block with no adverse impact on woodland.</p>	<p>Noted.</p>
	<p>It is recommended that the applicant has a woodland survey carried out by a professional arboriculturist/ forester to identify the location, nature and condition of all woodland on and around the site. The applicant should then use this survey to help inform the layout of the route order to minimise the impact on existing woodland.</p>	<p>A woodland survey will be carried out and the data obtained used to inform the design of the developments to minimise or avoid impacts on woodland.</p>
	<p>The applicant will also need to supply an Arboricultural Impact Assessment (AIA) which clarifies the realistic impact of development proposals on trees/ woodland and a Tree Protection Plan to show how all retained trees are to be safeguard from construction. The AIA will identify the extent of woodland which would be lost to development and this is highly likely to trigger the Scottish Government's policy on the Control of Woodland Removal. In order to comply with the policy, the applicant will need to i) identify what significant and clearly defined additional public benefit would be associated with the development; ii) identify the extent of woodland that would be permanently lost to development and iii) provide details of how the area of woodland that would be lost would be adequately compensated for with an equivalent area of new woodland planting on an un-treed site elsewhere.</p>	<p>An AIA will be prepared as part of the EIA/EA stage to identify likely impacts of the development on trees and woodland areas and lay out a Tree Protection Plan. If any woodland is likely to be lost to development, the required information will be provided as part of the EIA/EA Reports.</p>
	<p>Scottish Planning Policy affords 'significant protection' to carbon-rich soils, deep peat and priority peatland habitat. If such areas could be affected, we would expect any future application to demonstrate how any significant effects can be substantially overcome by siting, design or other mitigation.</p>	<p>The EIA/EA Reports will include information on how the developments overcome any significant effects on the noted soils and habitats.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	No potential contaminated land issues are raised by the contaminated land officer.	Noted.
	The separation distance between the site and noise sensitive properties is such that, for the most part, construction noise is unlikely to be an issue. Where works are carried out closer to houses, the applicant will be required to submit a scheme demonstrating how the best practicable means to reduce any noise impact will be implemented in order to reduce the impact of noise.	In the EIA/EA reports, SSEN Transmission will include details of a scheme demonstrating how the best practicable means to reduce any noise impact will be implemented in order to reduce the impact of noise where works are carried out closer to houses.
	The applicant will be required to undertake a survey to identify if any private water supply is likely to be at risk as a result of the proposed development. This Service can provide details of known supplies on request however, the applicant will still be required to undertake a site investigation to identify any supplies which may not be on our records. Should the assessment identify any PWS which may be at risk due to contamination of a watercourse/groundwater or a change in yield, it is expected that suitable mitigation will be implemented in accordance with the requirements of SEPA. Any potential issues due to physical disruption or damage to a water supply or any part of its distribution network would be a civil matter between the developer and the affected party.	SSEN Transmission will undertake a survey to identify if any private water supply is likely to be at risk as a result of the proposed development. Should the assessment identify any PWS which may be at risk due to contamination of a watercourse/groundwater or a change in yield, then suitable mitigation will be implemented in accordance with the requirements of SEPA.
	Any submission should include a Transport Assessment (TA) that sets out the public roads that'll be impacted by the proposed works, with justifications for the suitability of those routes, including any mitigation deemed necessary to support safe construction access. The basic framework for such a TA is provided below.	A TA that sets out the public roads that may be impacted by the proposed works, with justifications for the suitability of those routes, including any mitigation deemed necessary to support safe construction access, will be submitted in the EIA/EA reporting.
	Transport Planning Team accepts that construction access is likely to have the greatest vehicular impact on the local public roads and any assessment should be based on that worst-case scenario. However, any submission should also set out the likely operational access needs during the life of the proposed development, including clarity on the points of access from the public road being left in-place, the form of those accesses and a breakdown of the anticipated type and frequency of traffic needing to use them.	EIA/EA reports will set out the likely operational access needs during the life of the proposed development, including clarity on the points of access from the public road being left in-place, the form of those accesses and a breakdown of the anticipated type and frequency of traffic needing to use them.
	It is Transport Planning Team's understanding that construction access could be split, with some access being taken from the south and the A86 Trunk Road and the remaining access being taken from the north and the B862 local public road. For access from the south, we will not accept construction access along the U2104	The TA will demonstrate that there is an agreement in-place for use of the A86 Trunk Road at an existing private access close to the Wolftrax facility for construction and ongoing operational access.



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>Laggan to Melgarve Road from Laggan, as this is a substandard route not suitable for larger commercial traffic to use. The information provided suggests that access would be taken from the A86 Trunk Road at an existing private access close to the Wolfrax facility. The submission will need to demonstrate that there is an agreement in-place for use of that private route for the proposed construction and ongoing operational access needs.</p>	
	<p>It's Transport Planning Team's understanding that there is a temporary panel bridge across the River Spey adjacent to the public Spey Dam Bridge. If this is correct, we would expect all construction access needs for the proposed OH Line works is taken across that temporary panel bridge. If that temporary bridge will not be available for use during these works, any submission will need to demonstrate that the public Spey Dam Bridge is capable of safely accommodating all anticipated construction access needs from the south. This should include an assessment into the loading impacts on the bridge and setting out any works required to ensure that safe construction access can be taken over that structure.</p>	<p>A TA that sets out the public roads that may be impacted by the proposed works, with justifications for the suitability of those routes, including any mitigation deemed necessary to support safe construction access will be submitted in the EIA/EA reporting. This will include an assessment on any bridges required.</p>
	<p>With regards to possible construction access from the north, it should be recognised that the B862 is a substandard route, as is the B851 that it comes off and the B852 that connects with it. Therefore, construction access proposing to use any of these routes will need to agree appropriate improvement / investment measures towards mitigating impacts from those access requirements. Such mitigation should be developed in accordance with the current South Loch Ness Road Improvement Strategy and be agreed with The Council who are leading on the development and delivery of that strategy.</p>	<p>A TA that sets out the public roads that may be impacted by the proposed works, with justifications for the suitability of those routes, including any mitigation deemed necessary to support safe construction access, will be submitted in the EIA/EA reporting. This includes mitigation and investment measures towards mitigating impacts. Such mitigation would be developed in accordance with the current South Loch Ness Road Improvement Strategy and be agreed with The Council.</p>
	<p>Any survey information gathered during the current Covid pandemic to determine baseline traffic levels will need to be supported with additional data to determine the likely levels of influence that Covid may have had on such traffic levels. The submission should include full details on the data used and approach taken to determine likely Covid influences, including justification for any assumptions made and any alterations / uplifts applied to surveyed data.</p>	<p>This has been noted. The TA along with the EIA/EA submission for the Proposed Development will include full details on the data used and approach taken to determine likely Covid influences when considering baseline traffic levels.</p>
	<p>When compiling data on predicted traffic movements for this development, the assessment should set out and justify all assumptions made in support of the trip levels used. This includes for example any assumptions made about the amounts of</p>	<p>The TA along with the EIA/EA submission will set out and justify all assumptions made in support of the trip levels used when compiling data on predicted traffic movements. Assumptions</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>material that may be obtained from borrow pits within or close to the site. However, if insufficient information has been gathered to determine the appropriateness of any material within the site for use in the works, we'll expect the assessment process to have reviewed the worst case scenario of no such suitable materials being found within the site.</p>	<p>made about the volumes of material that may be obtained from borrow pits within or close to the site will be included, or the assessment process will have reviewed the worst case scenario of no such suitable materials being found within the site.</p>
	<p>Prior to preparation of the TA, the applicant shall undertake a detailed scoping exercise in consultation with the Council's Transport Planning Team and Transport Scotland.</p>	<p>A detailed scoping exercise will be carried out in consultation with the Council's Transport Planning Team and Transport Scotland.</p>
	<p>Any requirements for abnormal loads associated with this development will need to be identified in the submission, including clarifying the routing of those AIL's to and from the development site. A review of the preferred routing should also include consideration of any structures along the proposed route. Its Transport Planning Team's understanding that the existing Spey Dam public bridge is deemed unsuitable for abnormal load vehicles.</p>	<p>A TA that sets out the public roads that may be impacted by the proposed works, with justifications for the suitability of those routes, including any mitigation deemed necessary to support safe construction access will be submitted in the EIA reporting. The limitations of the existing Spey Dam public bridge are noted.</p>
	<p>The TA should include a Framework Construction Traffic Management Plan (CTMP) aimed at minimising the impact of the construction-related traffic on all other users of the local public roads in that area, including any measures deemed necessary to protect the safety of cyclists and pedestrians. This should recognise that public roads in this area are heavily influenced by tourist traffic. Measures proposed in a CTMP will be supplementary and complementary to any physical road improvements deemed necessary to achieve safe construction access. The development of a CTMP should give consideration to the following:</p> <ul style="list-style-type: none"> • Avoid HGV routing in the vicinity of local schools, particularly during school opening and closing times. • No convoying of HGV or site staff vehicles. • Agreed routes to be used by all site staff, contractor, sub-contractor and deliveries. • Clarify the steps that will be taken to deter / prevent construction traffic using non-designated routes to and from the site. • Providers of products and materials to this development (e.g. aggregate or concrete, staff mini-buses if used etc) should mark their vehicles with a unique number identifier on the front, sides and rear of the vehicles and a Melgarve substation identifier. This enables easy identification in the event of problems arising, such as speeding or discourteous driving, as registration number plates are 	<p>A CTMP will be included within the TA. This will address the noted points, but may have limitations/caveats as some aspects will require input from the Principal Contractor who may not have been engaged at the time of consent application. As such, SSEN Transmission may need to request a CTMP as a condition of consent.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>difficult to obtain. It also helps to avoid issues with traffic from other developments being wrongly associated with this proposal.</p> <ul style="list-style-type: none"> • Setting up a single point of contact for local residents to use in the event of problems or concerns, such as in the above bullet point. This should be telephone and website details as a minimum, with consideration of Twitter and Facebook as appropriate. All such details should be provided to Community Councils for their notice boards and websites. • Toolbox talks established with all suppliers, contractors, site staff etc to encourage careful and courteous driving at all times. Particular attention should be made to driving through all villages and settlements, with cognisance of relevant speed restrictions and local conditions/limitations of the road network. 	
	<p>To ensure that arrangements are in place to protect the Local Roads Authority from having to fund repairs from any damage incurred to the local public road network as a result of these works, we would expect any proposal to enter into a formal Section 96 'Wear & Tear' Agreements (Section 96 of the Roads (Scotland) Act 1984) with Highland Council, if there are sections of the local public road network being used to access this development.</p> <p>As with CTMP's, we would see this as supplementary to any physical improvements deemed necessary to make the local public roads safe and usable by all, including by construction related vehicles.</p>	<p>SSEN Transmission will discuss the requirements of any Section 96 with the Highland Council for provision of a wear and tear agreement as part of a legal agreement separate to the Section 37 consent.</p>
	<p>The proposal for any new or upgraded access points onto the local public road network shall be detailed on dimensioned drawings including radii, surfacing and drainage as well as the required visibility splays in accordance with the Highland Council's Roads and Transport Guidelines for New Developments.</p>	<p>The TA will include plans detailing surfacing, drainage and visibility splays with relevant dimensions included, in line with THC's noted guidance.</p>
	<p>The intended location of site compounds / offices, material stores, loading and unloading areas, workforce parking areas and the routes connecting them to the public road network should be clearly identified in any submission made. The submission should also define the private off-road access routes that'll be used to access the site, clearly defining which routes are intended to be left in-place and which will be removed when no longer required. The finished form of any routes being left in-place should be clarified, with justification why they will be needed in that form going forward.</p>	<p>The noted details will be included as far as possible in the EIA/EA reports / TA; however, it should be noted that these details are generally determined by the Principal Contractor who is engaged following granting of consents. Outline plans will be included and later updated once further details are known from the Principal Contractor.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>TA Methodology - 1</p> <p>Identify all public roads affected by the development. It is expected that the developer will submit preferred access route(s) for the development, both for any required abnormal loads and for general construction traffic, staff and suppliers. All other possible access route options should be identified, having been investigated in order to establish their feasibility. This should clearly identify the pros and cons of all the route options and therefore provide a logical selection process for arriving at the preferred route(s).</p>	<p>The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.</p>
	<p>TA Methodology - 2</p> <p>Set out the existing nature and condition of these public roads. This should include:</p> <ul style="list-style-type: none"> • The road name and number, where applicable. • Road widths, including any pinch points. • The nature of their horizontal and vertical alignments, including any known steep gradients. • An appraisal of the carriageway strength including, where necessary, construction depths and road formation where there is likely to be significant impacts. • The location of any structures either spanning or supporting the roads, including a description of their nature (eg bridge, culvert etc), any width, and height or weight restrictions and where necessary, an assessment of their load carrying capability. <p>This work should be undertaken by a suitably capable and qualified consulting engineer acceptable to The Council.</p> <p>The nature and quantum of properties and other development types serviced by the roads. In addition to the quantum of residential properties, specific recognition should be made of any sensitive facilities such as schools, businesses or other community facilities along the roads.</p> <ul style="list-style-type: none"> • The nature and quantum of existing traffic flows on these roads. This should include reference to how often the roads are used by school or commercial bus services and whether the routes are used by pedestrians, cyclists and equestrians. <p>Our Public Transport Team may be able to assist with info on school and scheduled bus services.</p>	<p>The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.</p>
	<p>TA Methodology - 3</p> <p>Identify the anticipated impacts from the proposed development, including any cumulative impacts from other developments that have the potential to be</p>	<p>The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>happening at the same time. These impacts should include:</p> <ul style="list-style-type: none"> • The quantum of new traffic impacting on these roads throughout the construction, operation and decommissioning periods of this development. This should cover: <ul style="list-style-type: none"> o numbers of light and heavy vehicles (differentiated) o numbers of abnormal loads o profiles of anticipated new traffic movements throughout the duration of the works • Any impacts to existing carriageways, structures, verges or other aspects of these public roads. This should include information on swept paths and gradient analysis where it is envisaged that the passage of traffic could be problematic. • The location of any new or changes to existing accesses off these public roads to be used for accessing this development. This should include the extent of existing visibility from each of the accesses onto the public roads. • Any impacts or restrictions needing to be imposed on existing road users. • Any impacts or restrictions needing to be imposed on adjacent properties or local communities serviced by these public roads. 	
	<p>TA Methodology - 4</p> <p>Set out the proposed mitigation measures needed to tackle the anticipated impacts set out above. This should include:</p> <ul style="list-style-type: none"> • The location and nature of any carriageway widening or strengthening. • Works to improve the visibility at proposed access points with public roads and at junctions along the proposed access routes. • The location and nature of any strengthening or widening needed to existing structures. • The provision of new or enhanced passing places on single track roads. • Road safety measures deemed necessary to effectively manage the impacts of any identified road safety issues. • Traffic management proposals deemed necessary to enhance compliance with the traffic management plan associated with the construction and ongoing operation of this development. <p>It should also be noted that any physical mitigation required may need to be specifically considered within the wider considerations of an EIA, depending on the form, scale and location of the works proposed and their potential impacts to any existing environmentally sensitive sites.</p>	<p>The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>TA Methodology - 5 Details of any residual effects on the road network and its users following the implementation of the proposed mitigation outlined above and any actions proposed associated with those residual effects.</p>	<p>The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.</p>
	<p>The information above related to transport is not exhaustive and should be used as a guide to submitting information relating to local roads, traffic and transportation matters arising from the development proposals, which should be in the form of a TA forming part of the Environmental Impact Assessment.</p>	<p>The TA accompanying the EIA/EA reports will follow the above points as a guide and include any further pertinent information beyond these.</p>
	<p>In line with HwLDP Policy 77 an access management plan is required for major developments and is expected to be provided for this scale of project. In this case an EIA or Environmental Appraisal that comprehensively assesses the proposals impact on outdoor access in line with Appendix 6 of NatureScot's and identifies adequate mitigation measures will form the basis of that plan. It should seek to minimise any negative impacts on outdoor access, including the construction phase, and look to maximise any benefits.</p>	<p>An Access Management Plan will be provided with the EIA/EA reports that comprehensively assesses the proposals impact on outdoor access and seek to minimise any negative impacts.</p>
	<p>The assessment should include an investigation into the proposal's effects on the quality of the settings where recreation takes place. That links back to the Council's HwLDP Policy 78 Long Distance Routes where we would seek to safeguard and enhance long distance routes and their settings. In this case General Wade's Military Road forms part of coast to coast and Highland wide cycling trails. It is also a candidate core path.</p>	<p>EIA/EA reporting will include assessment of the Proposed Development's impacts on recreation. Long Distance Routes will be featured in this assessment, and any impacts on General Wade's Military Road will be included.</p>
	<p>There are other public rights of way across the site along with parts of the wider paths network, popular routes up hills along with a growing awareness of the potential for local windfarm tracks for recreation. Scottish Hill Tracks is not an adequately comprehensive list on which to base an assessment. Scotways will provide more up to date and complete information.</p>	<p>Noted. More up to date and complete information from Scotways will be reviewed once received.</p>
	<p>If tracks are to be installed for the project that are likely to be permanent, the Council's Access Officer strongly recommends that any gates erected across them include pass gates for walkers, cyclists and horse riders at the outset. Those should have an internal width of at least 1.5m - kissing gates are inappropriate. Access to and from the site may be along the track to the Melgarve substation. From Spey</p>	<p>EIA/EA reporting will include assessment of the Proposed Development's impacts on recreation. Where new permanent gates are installed as part of the project a clear commitment in the schedule of mitigation to include access for walkers, cyclists and horse riders will be provided in the EIA/EA Report.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>Dam this route is the de facto line of a public right of way along which public access should be accommodated during and on completion of any development. Information on shared use to both developers and access takers will help avoid issues which to date have been few and far between.</p>	
	<p>HwLDP Policy 66 (Surface Water Drainage) requires new developments to utilise Sustainable Drainage Systems (SuDS) to return all surface water back to the natural water cycle in a sustainable manner. A DIA is required. The DIA should include details relating to any existing field drains and the management of surface water drainage, which should be designed in line with general Sustainable Drainage Systems (SuDS) principles. The applicant should demonstrate, within the proposals submitted, any mitigation measures to manage the residual risk of overland flow/pluvial flooding.</p>	<p>A Drainage Impact Assessment will accompany the EIA/EA reports along with details of SuDS designs, where required. Any other mitigation measures necessary to manage residual flood risk will also be set out within the reports.</p>
	<p>Natural flood management techniques should also be applied to reduce the rate of runoff where possible. Access roads should not act as preferential pathways for runoff and efforts should be made to retain the existing drainage network. Appropriate drainage is required to restrict runoff to pre-development rates and to minimise erosion to existing watercourses. The DIA should ensure that post development runoff rate is no greater than pre-development runoff rate (i.e. greenfield runoff) for all return periods up to the 1 in 200 year event including an allowance for climate change.</p>	<p>The DIA will include details of flood management techniques to reduce runoff rates and avoid access roads or underground cable routes becoming preferential pathways. Appropriate drainage measures will be implemented.</p>
	<p>Runoff from all events up to and including the 1 in 200 year plus climate change event should be managed within the site boundary, with no flooding to critical roads or buildings, and evidence as to how this will be achieved should be included within the DIA.</p>	<p>The DIA will include details of flood management techniques, including up to a 1 in 200 year event and how increased flooding to critical roads or buildings will be avoided.</p>
	<p>Several features of interest are recorded within or close to the proposed route corridor. These mostly consist of the remains of historic land use such as areas of shieling settlement. The Council's Historic Environment Team notes that additional shieling areas were identified during targeted survey work earlier this year. There remains the potential for further features or remains to be present, however, direct impacts to cultural heritage are not envisaged to be a significant constraint across this landscape. It is expected that careful design will allow direct impacts to be avoided; but where this is not possible, mitigation will be necessary.</p>	<p>This has been noted. Cultural Heritage will be considered during route alignment optioneering to avoid features where possible. Cultural Heritage will also be considered for EIA Screening and where required an assessment of impacts to cultural heritage will be included in the EIA/EA reports.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>The Council's Developer Contributions Supplementary Guidance will be used in the determination of planning applications and requires all development, including single house developments, make proportionate financial developer contributions towards meeting service and infrastructure needs in areas of Highland where clear deficiencies are identified. For the proposed development, the anticipated developer contribution requirements are outlined below. Please note that requirements can change over time and the exact amount payable will be confirmed at the point that a planning application is determined.</p> <p>Industrial (including energy) developments are exempt from education, community facilities and affordable housing contributions. They may however be required to contribute towards Transport, Green Infrastructure, Water & Waste and Public Art.</p>	<p>Noted. However, as a Statutory Undertaker who is regulated by OFGEM, SHE Transmission must provide robust justification for all costs on the development. Therefore, any contributions can only be limited to those which are required to facilitate the construction and/or operation of the Proposals.</p>
	<p>The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 require that for any major or national development, pre-application consultation must be undertaken. This requires a formal Proposal of Application Notice (PAN) to be submitted to the Planning Authority at least 12 weeks prior to any formal planning application being lodged and any subsequent planning application must be accompanied by a Pre-application Community Consultation (PAC) report. Whilst any overhead line would be a Section 37 application, the substation extension triggers the need for the above measures to be followed. In consulting on the substation, it would be beneficial if the PAN, content of any consultation, and PAC report also covered the connection proposals.</p>	<p>A PAN will be issued no less than 12 weeks prior to applications for consent. This will be accompanied by a PAC Report.</p>
	<p>Public consultation should be undertaken as the proposals develop to help both gauging the opinion of the local community and also scoping potential areas of conflict which could be addressed prior to submission of the application. When carrying out community consultation we recommend that full consideration is taken of Scottish Government Planning Advice Note 3/2010 - Community Engagement. This includes the standards for community involvement which should be adhered to.</p>	<p>Public consultation has been and will continue to be undertaken throughout the development design process. Details of the first public consultation events for the routeing stage are detailed later in this Report. The standards for community engagement will be observed.</p>
	<p>It is advisable to take into consideration all of the comments made by members of the public before a planning application is submitted to ensure that the public feel they have had an influence over the proposals. For public consultation it may be useful to use the SP=EED tool developed by Planning Aid Scotland. This builds on the Standards for Community Engagement set out in PAN 3/2010.</p>	<p>Noted. SSEN Transmission will take into consideration all of the comments made by members of the public before a planning application is submitted. Responses will be set out in the PAC Report.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>Please note that during the Covid-19 pandemic there are exemptions related to Pre-Application Consultation with members of the public. If you are bringing forward your project in the coming months then it is highly recommended that you discuss these with the Case Officer at the earliest possible opportunity. It is expected for a development of this scale to undertake more than one online consultation event, with this to contain a live element, and to ensure that the events are widely publicised with a letter invitations to be sent to all properties in the locality, including any residents or businesses who would regularly use routes which bypasses the site.</p>	<p>Plans for public consultation events will be discussed with the Case Officer, with multiple events held to ensure all interested individuals can attend. These will be widely advertised with a particular focus on nearby residents and businesses. Responses will be set out in the PAC Report.</p>
	<p>In accordance with Part 2, Regulation 8 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, a formal request for a Screening Opinion should be made in writing to Scottish Ministers' Energy Consents Unit (ECU) for the proposed connections to determine whether an Environmental Impact Assessment (EIA) is required to support the application. Overhead electricity lines of less than 15km in length which connect any wind farm of a scale which requires consent under Section 36 of the Electricity Act, fall within Schedule 2 of these regulations and therefore the project must be screened to determine if any significant environmental effects are likely to arise by virtue of the factors such as size, nature or location. A formal request for a Screening Opinion should be made well in advance of the application's submission. Upon receipt, the ECU will then consult with the Planning Authority.</p>	<p>EIA Screening requests will be made for the overhead line connections to determine the need for full EIA. These will be made well in advance of the applications, taking into account the ECU's current delays to issuing of opinions.</p>
	<p>In terms of the appropriate Community Councils to consult, the proposal is located within the Stratherrick and Foyers Community Council area. A development of the nature proposed may affect a number of adjacent Community Councils, as such it is recommended that adjacent Community Councils are also consulted, particularly any neighbouring areas which may be impacted by construction related traffic or those which would have visibility of any overhead line. The Ward Manager of Stratherrick and Foyers Community Council Charles Stephen can provide advice further in this regard if required.</p>	<p>Community councils have been and will continue to be consulted on the proposals. As noted later in this Report, the community councils attended the routing stage public consultation event and SSEN Transmission has undertaken further direct consultation with the Laggan community council.</p>
	<p>It would be beneficial to at this stage consult with the local Disability Access Panel. The contact details for your local panel are: Badenoch and Strathspey Access Panel, c/o VABS, 2 Inverewe, Grampian Road, Aviemore, PH22 1RH. Telephone:</p>	<p>Public access requirements will be covered off by way of the Access Management Plan as noted above.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	(01479) 810004. For advice in relation to the removal of barriers and the promotion of equal access for all people affected by disability for your development contact the Scottish Disability Equality Forum, 12 Enterprise House, Springkerse Business Park, Stirling, FK7 7UF. Telephone: (01786) 446456.	A Design and Access Statement will also be considered as part of the s37 application.
Non-Statutory		
British Telecom (BT)	We have studied this proposal with respect to EMC and related problems to BT point-to-point microwave radio links. The conclusion is that the Project indicated using the study corridor and route options provided should not cause interference to BT's current and presently planned radio network.	Noted.
Connell Renewables Ltd	Connell Renewables Ltd would suggest that SSEN Transmission reconsider the preferred engineering solution of an OHL for Cloiche and Dell. An alternative UGC solution would overcome technical concerns pertaining to OHL construction and long-term maintenance in extreme weather conditions in the area.	SSEN Transmission has been contracted by the developers of Cloiche and Dell wind farms to provide OHL connections; however, potential for UGC connections will be explored in the event that OHL solutions are not viable for engineering, environmental or other developmental reasons.
	Clarification is required on the recreation activities which the appraisal has considered to ensure that all activities are given equal weight as it is not clear what weight is given, if any, to the importance of sporting on Stronelaig Estate.	Potential impacts on recreational activities were considered during initial environmental appraisals of route options and included grouse shooting, deer stalking and trout fishing, along with various walking and hiking routes and trails. These will be considered in greater detail as the project progresses.
	No objection or concerns about the visual impact on Stronelaig Estate of route option C1, same applies to C2A & C2B.	Noted.
	Route Option C3, which proposes bringing an OHL right from the Estate west march/boundary line into the centre of our prime shooting ground, upon which the finance of the Estate is dependant. The route then heads south out over one of the high points, where an OHL would have a very significant adverse visual and landscape impact on the setting and therefore the activities on Stronelaig Estate. OHL through option C3 has a more significant visual impact, preference for OHL is C1, C2A and C2B.	Potential impacts on recreational interests and landscape and visual impacts will be considered in more detail as the project progresses, with a view to minimising adverse effects.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	Majority of sporting endeavours happen in and around Route Option C3. An OHL here would have a very significantly detrimental visual impact and also practical implications for sporting visitors to the Estate. The impact for recreation should be adjusted to amber or red, unless an UGC is adopted for Route Option C3.	The potential implications on sporting activities of an OHL within Route C3 are noted and will be considered further in the next stage of the project.
	I wholly support landowner objection to either OHL or UGC along any alignment through D2. Route D1, would have less visual impact on the Estate, but would nevertheless benefit from an UGC from D1 to the Cloiche substation.	The objection to alignments through Route Option D2 and preference for a UGC rather than OHL through Route Option D1 are noted.
	No specific comment on the Glenshero connection. I would seek to maintain the arrangements already in place for Glenshero wind farm	Noted.
Crown Estate Scotland	The assets of Crown Estate Scotland are not affected by this proposal, and we therefore have no comments to make.	Noted.
Highlands and Islands Airport Ltd (HIAL) Safeguarding	No mention of aviation impact has been supplied in the consultation material. The route options are too numerous and vague for HIAL to give a preference, however due to proposed height it is unlikely any of the options would impact Inverness safeguarding surfaces or primary surveillance radar. HIAL reserve the right to comment, object or request a condition on any future planning consultations with a route option that impact the safeguarding criteria and primary surveillance radar for Inverness airport. When options are at a mature stage HIAL advise that an aviation impact assessment is performed to ensure no impact to Inverness or any airport.	As the project is at an early stage, no aviation assessments have been carried out. It is highlighted that the proposed OHL structures would be smaller than the existing and proposed wind turbines across the site and thus pose less of a constraint to aircraft or interfere with radar installations. An aviation impact assessment will be considered as part of the full EIA.
Hillhouse Estates Ltd	We are concerned that the grid connections for Cloiche Windfarm and Dell Windfarm have only been appraised as 132kv overhead lines (OHLs) on lattice steel towers between 22m and 39m tall. It is our strong preference that the connections for Cloiche Windfarm and Dell Windfarm should be by UGCs. We believe that appropriately routed UGCs for Dell and Cloiche will provide the correct balance of environmental, technical and economic factors. Stronelairg Windfarm connection to Melgarve was originally an OHL but then reverted to UGC following consultation.	The preference for UGC connection is noted. Further consideration of options will be undertaken during the Alignment options stage.
	It is unclear how a suitable OHL route can be established as routes for Cloiche and Dell are heavily constrained by existing and proposed turbines. Routeing an OHL through the existing and consented turbines will likely cause unacceptable wear and tear on the OHL, require routine shutdowns of the windfarms and overall loss of	The interaction between existing and proposed turbines and a new OHL connection is currently undergoing additional study to determine the feasibility of this approach from a technical standpoint, with wear on an OHL from turbine wake effects a central focus. In the event that an OHL through wind farm areas is



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	electricity generation. These will have financial implications that should not be overlooked.	deemed to be unfeasible, other options will be explored, including use of UGC.
	The Cloiche substation is to be located on Glendoe Estate and there is no agreement in place between the Estate and the developer of Dell Windfarm that would allow for that connection to be made. The nature and scale of the OHLs being proposed would likely give rise to unacceptable effects on the natural beauty of the area through landscape and visual effects.	The point on land agreements is noted, however these are outwith the scope of this appraisal which focuses on the environmental, technical and cost factors associated with the options under consideration. Potential impacts on the landscape and visual receptors in the area will be considered as part of specific assessments within the EIA/EA.
	Potentially significant impacts on flora, fauna and peat from UGCs could largely be overcome by locating UGCs along access corridors for windfarm tracks (existing and consented).	Noted. The alignment options within the routes considered will seek to remain close to existing infrastructure and disturbed ground, wherever possible.
	We agree that the existing access that runs through the Estate to Stronelairg Windfarm and the existing track network for Stronelairg Windfarm should be utilised as far as practicable to limit new access construction. The siting of any new tracks on the Estate should minimise impacts on flora and fauna and peat.	The preference use of existing tracks is noted, and alignments with SSEN Transmission's own preferences in this regard.
Joint Radio Company (JRC)	JRC confirm that, based on the shapefile data provided as part of the consultation request, there will not be any issues.	Noted.
Ministry of Defence	This application relates to a site outside of Ministry of Defence safeguarding areas. It is therefore confirmed that the Ministry of Defence has no safeguarding objections to this proposal.	Noted.
RSP Safeguarding	The assessor can confirm that, based on the coordinates provided as part of consultation, RSP Safeguarding have no concerns with the proposal.	Noted.
Scottish Water	A review of our records indicates that the proposed routes fall 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. Loch Ness supplies Invermoriston 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 immediately. If we deem it necessary additional local Scottish Water contact details will also be provided to ensure	Scottish Water will be notified immediately in the event of an incident occurring which could affect the quality and / or quantity of water within the DWPA. It is noted that Scottish Water may direct SSEN Transmission to additional contacts within the operations team.



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	operational teams are aware of the activity, which is likely to be the case with this activity when work begins.	
	It is a relatively large catchment, and the activity is sufficient distance from the intake that it is likely to be low risk, however care should be taken, and water quality protection measures must be implemented.	Noted. Appropriate measures will be put in place during construction works to minimise potential adverse effects on water quality.
	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.	The noted documentation and information will be used to inform the EIA and mitigation measures proposed as part of the proposals.
	We welcome receipt of this notification about the proposed activity within a drinking water catchment where a Scottish Water abstraction is located and the fact SSEN Transmission have sought early engagement with us.	Noted.
	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.	The fact that the area is located within a drinking water catchment will be noted within future documentation and all personnel will be made aware of the fact as part of 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.	SSEN Transmission will continue to engage with Scottish Water as the project progresses as part of consultation processes.
	It would be useful to get an idea of when work is likely to begin on site for this activity, as there may be other projects which could be taking place at the same time, and we need to ensure all parties are aware and prepared if this is to be the case.	Noted. SSEN Transmission will notify Scottish Water of the likely timeframes for commencement of works as the project progresses.
SSE Generation Limited as owner / operator of Glendoe Hydro Scheme	SSE Glendoe's primary concern is that in its development of the Melgarve Cluster Project, SSEN Transmission fully considers the potentially significant impact on Glendoe as an existing operational asset. We hope that by discussing and mitigating any potential impact to Glendoe's operations, the Project can proceed without disrupting Glendoe's capacity to operate and its ability to export renewable energy. While the power station itself is not within the study area, large parts of the study area are within the catchment area (Catchment being the large area of land	Potential impacts of the proposals on Glendoe Hydro Scheme, including indirectly through impacts on the water environment within its catchment area, are part of the current appraisal process and will be considered in further detail at the EIA/EA stage. SSEN Transmission would be happy to discuss the development directly.



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>surrounding the Glendoe dam/headpond which is used to channel water into storage for commercial dispatch) . SSE Glendoe request that SSEN Transmission show SSE Glendoe’s assets on the preferred route plan.</p>	<p>Plans produced as part of the alignment options stage will display the Glendoe Hydro Scheme assets.</p>
	<p>SSE Glendoe’s concern with the proposals set out in the Consultation is that SSEN Transmission’s preferred connection route overlaps infrastructure integral to SSE Glendoe. Insufficient information on the preferred connection route has been provided to allow SSE Glendoe to properly consider impacts for SSE Glendoe. However, on the basis of the information provided, the preferred connection route would appear to negatively impact upon SSE Glendoe. SSE Glendoe would welcome the opportunity to engage in further consultation with SSEN Transmission so that further information on the extent of overlap between the Melgarve Cluster and SSE Glendoe infrastructure can be understood.</p>	<p>The presence of Glendoe Hydro Scheme assets across the site and the need to navigate these effectively has formed part of design discussions from the outset of the project and will continue to be an important focus as the project progresses. SSEN Transmission would be happy to engage further directly to ensure that potential impacts on the Scheme are minimised.</p>
	<p>Our understanding of the Consultation proposals is that only the Glenshero connection prefers a buried cable solution. We understand also that the Glenshero connection route is largely (and possibly entirely) out with SSE Glendoe’s catchment area. Buried cable installation is likely to have a greater chance of causing issues for SSE Glendoe than overhead line construction, given the greater degree of ground disturbance that accompanies it. Accordingly, if any buried cable installation is proposed within Glendoe’s catchment area, SSE Glendoe’s preference would be for buried cable installation to be avoided. We will provide a more detailed response on buried cable installation and the extent to which it affects SSE Glendoe once SSEN Transmission has given the further information outlined above relating to the extent of overlap between the two schemes.</p>	<p>The preference for OHL rather than UGC to minimise potential adverse impacts on the Glendoe Hydro Scheme is noted. The current contracted position is for SSEN Transmission to connect Dell and Cloiche wind farms via OHL and Glenshero Wind Farm via UGC. The overlap between the Glendoe cable and Glendoe Hydro Scheme developments will be explored further.</p>
	<p>No details of the proposed access arrangements are provided. SSE Glendoe has concerns about the disruption that the Melgarve Project’s use of this access may cause to SSE Glendoe’s ability to access and operate SSE Glendoe, we would raise the following concerns: Access control, CDM Site Management, Road Maintenance, Road costs, Snow Clearing & Interaction with other Developments.</p>	<p>The concerns in relation to access are noted. At this early stage of the project, access arrangements have not been confirmed; however, SSEN Transmission would seek to utilise existing access tracks wherever possible to minimise impacts to currently undisturbed ground. Traffic and access arrangements will be developed as the project progresses and in liaison with affected stakeholders to ensure minimal disruption of existing operations and road users.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>SSE Glendoe would like to be consulted on compound siting location. SSE Glendoe has extensive underground cable routes in the area, which will need to be avoided when any excavation works are taking place. If OHLs are the preferred option, other types of tower / construction method may have less impact on SSE Glendoe. During construction of the lattice towers there is a risk of disturbance to the existing ground and to watercourses that lead either directly into the reservoir or into intakes that divert flow to the reservoir.</p>	<p>SSEN Transmission will consult with SSE Glendoe on the location(s) of site compound(s) for use in construction. The grid connections will be designed so as to avoid excavation over or near existing assets wherever possible. If this cannot be avoided, suitable measures would be put in place to ensure no damage or disruption to existing infrastructure. Suitable separation buffers will be put in place around watercourses and appropriate mitigation employed to minimise adverse impacts to the water environment.</p>
	<p>A Construction Environmental Management Plan and an Operational Environmental Management Plan should be in place ahead of the relevant works commencing, to detail Environmental Management controls to be used to mitigate any potential environmental impacts for works taking place in the consented windfarm area. SSE Glendoe's operational team would ask to be given the opportunity to comment on these plans in advance of works commencing.</p>	<p>An appropriate Construction Environmental Management Plan will be produced ahead of works commencing. An Operational Environmental Management Plan will also be produced, depending on the final design and operational requirements. Glendoe Hydro Scheme's operational team will be invited to review and comment on the plan(s).</p>
	<p>Should an environmental incident occur, SSE Glendoe's requests notification as soon as possible in order that appropriate action can be taken to contain and/or mitigate the impacts of the incident.</p>	<p>In the event of an environmental incident occurring, SSEN Transmission will make the Glendoe team aware as soon as possible.</p>
	<p>SSE Glendoe insist that no water is pumped out of the Glendoe reservoir catchment. This is an essential requirement for the operation of SSE Glendoe. SSE Glendoe request reassurance on this point from SSE Transmission and request that this requirement be made a condition of the future construction and operation of the Melgarve Project works.</p>	<p>It is not anticipated that there would be any requirement to pump water from the Glendoe reservoir catchment for the proposals.</p>
<p>SSE Renewables for Cloiche Wind Farm</p>	<p>SSER, on behalf of Cloiche Wind Farm, has no comment on the preferred route G1 for Glenshero Wind Farm to Melgarve substation. No comments are provided with regards to the extension of Melgarve substation which we note will be subject to further separate consultation at a later date by SSEN Transmission.</p>	<p>Noted.</p>
	<p>SSER would look for the Preferred Alignment of D1 to take due cognisance of the Habitat Management Unit for Cloiche Wind Farm and its long-term management to ensure its success against stated aims. 10 proposed Cloiche wind turbines are sited within Preferred Route D1.</p>	<p>Noted. The habitat management plan for Cloiche Wind Farm will be reviewed to ensure that the proposed connections do not interfere with its stated aims.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>SSEN-T should select a Preferred Alignment that ensures either that the User requirement imposed by the Construction Agreement to ensure a minimum horizontal clearance of 1.5 times the height of the completed wind turbine to all OHL infrastructure can be achieved or, if SSEN-T's own policies require the Energy Networks Association Engineering Recommendation L44 to be followed, that this level of horizontal clearance can be achieved. SSEN-T should confirm whether the Preferred Alignment will meet the required horizontal clearance from all proposed Cloiche turbines, within Preferred Route D1.</p>	<p>SSEN Transmission will confirm the horizontal separation of OHLs from all wind turbines as part of the selection of a preferred alignment. Alignment options will be identified which seek to observe a separation distance of 1.5 times tip height of turbines.</p>
	<p>There is insufficient detail within the consultation document to allow a full assessment of the potential implications of a physical connection of Dell Wind Farm into the proposed Cloiche Wind Farm substation and we reserve the right to respond more fully when proposed connection designs are provided.</p>	<p>Noted. Further consultation will be carried out during the alignment selection stage and further comment will be invited from SSE Renewables for Cloiche Wind Farm.</p>
	<p>It is noted that the Submission of Section 37 application dates listed in the Executive Summary of the MCDD for the Dell Wind Farm connection and the Cloiche Wind Farm connection differ, with the Section 37 application for Cloiche's connection currently due to be submitted first. It is assumed that this would ensure that the delivery of the Cloiche Wind Farm connection would be progressed if it achieved Section 37 consent even if the Dell Wind Farm Section 37 application encountered delays or problems with consent award, and that the consent for Cloiche's connection will not be intrinsically linked to Dell's connection (notwithstanding any cumulative effects that may require to be considered).</p>	<p>Noted.</p>
	<p>Eleven proposed Cloiche wind turbines are sited within Preferred Route C3. SSEN-T should confirm whether the Preferred Alignment will meet this required horizontal clearance from all proposed Cloiche turbines, within Preferred Route C3.</p>	<p>SSEN Transmission will confirm the horizontal separation of OHLs from all wind turbines as part of the selection of a preferred alignment. Alignment options will be identified which seek to observe a separation distance of 1.5 times tip height of turbines.</p>
	<p>Reinforcing the OHL circuit that is proposed between Cloiche and Melgarve substation from a single circuit to a double circuit to include the connection of Dell Wind Farm will result in an increased risk of failure along the route. This could result in Cloiche Wind Farm not being able to export.</p>	<p>The point is noted. Engineering feasibility studies will include consideration of opportunities and risks for single vs double circuit comparisons.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	We would welcome the opportunity to discuss all points made on behalf of the future Cloiche Wind Farm project between now and the finalisation of Preferred Alignment consultation material.	SSEN Transmission will invite further consultation from Cloiche Wind Farm as part of the alignment selection stage and would be happy to discuss the development design further directly.
SIMEC (Glenshero Wind Farm and Jahama Highland Estate)	SIMEC is concerned and disappointed with SHET's proposal to connect the Cloiche and Dell windfarms using overhead lines supported by steel lattice towers. As the developer of Glenshero Wind Farm, SIMEC made a conscious choice to request a UGC connection to keep the wind farm development on the plateau and minimise visual impacts associated with the connection descending the hill towards Melgarve substation. Overhead lines would seriously undermine the benefits of Glenshero's underground cable connection. The Estate is unlikely to accept any such proposal for OHLs to connect Cloiche and Dell.	The Estate's position on OHLs and likely objection are noted. SSEN Transmission are contracted to develop the connection types stipulated by the Cloiche and Dell wind farm developers, which are OHLs. Should OHL connections be deemed unfeasible on environmental, engineering or economic grounds, other options, including UGC connections, can be explored; however, in the interim SSEN Transmission must abide by the contracted position. Future EIA/EA for the proposals will include assessment of potential landscape and visual impacts, which will aid in the design process.
	OHLs for Cloiche and Dell are much more likely to interfere with the development and construction of Glenshero windfarm, more likely to have negative impacts on wildlife and would require additional planning consents, thereby increasing programme risk to SHET, Cloiche and Dell.	The nature and degree of potential impacts from OHL connections will be explored further as the project progresses through alignment selection and EIA stages, including impacts on wildlife. The selection of alignment options will be made with Glenshero Wind Farm's turbine locations and associated infrastructure in mind so as to develop appropriate connections with minimal interference with other developments.
	The OHLs go against the community's clear and recently established preference for underground cable that SHET solicited during its 2015 consultation on connecting the (now operational) Stronelairst windfarm to Melgarve. It is disappointing and frustrating to have to argue once again for underground cable connections for Cloiche and Dell, when SHET could simply have followed the precedents set by Stronelairst and Glenshero.	The community preference for UGC connections is noted. SSEN Transmission are contracted to develop the connection types stipulated by the Cloiche and Dell wind farm developers, which are OHLs. Should OHL connections be deemed unfeasible on environmental, engineering or economic grounds, other options, including UGC connections, can be explored; however, in the interim SSEN Transmission must abide by the contracted position.
Stronelairst Wind Farm Ltd	Stronelairst leases some of the land that SSEN Transmission is proposing to access and occupy. Where works are to be carried out within the windfarm consented area, these should not cause an environmental impact to the windfarm.	Noted. The proposals will seek to avoid or appropriately mitigate any adverse environmental effects to the site and the Stronelairst Wind Farm.



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>A Construction Environmental Management Plan and an Operational Environmental Management Plan should be put in place ahead of the relevant works commencing. Should an Environmental incident occur, Stronelairg requests notification within 24 hours.</p>	<p>An appropriate Construction Environmental Management Plan will be produced ahead of works commencing. An Operational Environmental Management Plan may also be produced, depending on the final design and operational requirements. In the event of an environmental incident occurring, SSEN Transmission will make the Stronelairg team aware as soon as possible.</p>
	<p>We have concerns that as the preferred routes for Cloiche and Dell both pass through/by Stronelairg and our access roads, there is the potential for the routes to negatively impact upon the operation of Stronelairg at both the construction and operation stages of the Project. There is not currently enough information provided on the route options to allow us to properly consider the impacts on Stronelairg.</p>	<p>The concerns in relation to access are noted. At this early stage of the project, access arrangements have not been confirmed; however, SSEN Transmission would seek to utilise existing access tracks wherever possible to minimise impacts to currently undisturbed ground. Traffic and access arrangements will be developed as the project progresses and in liaison with affected stakeholders to ensure minimal disruption of existing operations and road users.</p>
	<p>SSEN Transmission's RAG rating for the preferred routes proximity to Stronelairg is Red. Given this, we have concerns about the potential impact on Stronelairg. We would request that OHLs and towers are sited at a suitable distance from Stronelairg's turbines and do not affect our access roads. We wish to have more specific discussions with SSEN Transmission on this. Can SSEN Transmission advise us of the current maximum distance from SWFL's turbines they are working to?</p>	<p>A Red RAG rating is applied for any connection within 750m of a wind farm; OHL towers will be designed and positioned so as not to interfere with a wind farm's operation and the guideline distance of 750m is a starting point for this. SSEN Transmission would be happy to discuss the development design further with Stronelairg Wind Farm Ltd.</p>
	<p>Section 6.2.54 states that "while not a consideration for planning proposals, OHL Route Option C3 [the Preferred Route] would also be subject to partial development constraint as a result of the turbines of the operational Stronelairg Wind Farm within its north boundary". SWFL would like to discuss this statement with SSEN Transmission to better understand how the Project is intended to interact with Stronelairg.</p>	<p>SSEN Transmission would be happy to discuss the development design further with Stronelairg Wind Farm Ltd.</p>
	<p>There is a potential risk that Project may impact Stronelairg's S36 Consent conditions. When more information is provided about the Project, we request that SSEN Transmission provides its views on any potential impacts in this regard.</p>	<p>Once the project has gone through further design and appraisal stages, SSEN Transmission would be happy to discuss potential interactions with Stronelairg Wind Farm's S36C conditions.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>Section 4.5.5 also states that the preferred route D1 would pass over Stronelaig's access tracks. We have concerns about the disruption this may cause to our ability to access and operate Stronelaig. More specifically we would like to have further discussions regarding the following: Access control, Disruption to Access, CDM Site Management, Road Maintenance, Snow Clearing, Interaction with other Developments, Turbine Access, Excavations, Ice Throw, Construction Compound Siting and Alternative Tower Types.</p>	<p>The concerns in relation to access are noted. At this early stage of the project, access arrangements have not been confirmed; however, SSEN Transmission would seek to utilise existing access tracks wherever possible to minimise impacts to currently undisturbed ground. Traffic and access arrangements will be developed as the project progresses and in liaison with affected stakeholders to ensure minimal disruption of existing operations and road users.</p>
	<p>Given the importance of Stronelaig to national electricity generation, we ask that the Project does not disrupt Stronelaig's capacity to operate and its ability to export renewable energy. We would like to discuss further with SSEN Transmission the potential impacts the Project may have in this regard before a final decision is taken on Project route selection.</p>	<p>The connections will be designed so as to avoid disrupting Stronelaig Wind Farm's electricity production. SSEN Transmission would be open to further direct discussion of potential interaction between the proposals and the Wind Farm as the project progresses.</p>
<p>Transport Scotland</p>	<p>The existing substation is located approximately 15km from the A86(T) at Laggan. Transport Scotland notes that a series of options are being considered for the connections, however, having reviewed the potential routes, we note that none of the options involve any crossing of the trunk road. Given the distance from the trunk road, Transport Scotland would consider it unlikely that the construction will cause any perceivable impact on the trunk road, however, in the event that abnormal loads are required to deliver components, Transport Scotland will require to be satisfied that these can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.</p> <p>An Abnormal Loads Assessment report should, therefore, be provided which will identify 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. Transport Scotland would state that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager.</p>	<p>An Abnormal Loads Assessment report will be provided with the TA which is included within the EIA/EA report which will identify key pinch points on the trunk road network. Swept path analysis will be undertaken and details provided with regard to any required changes to street furniture or structures along the route will be included.</p>

Table 5.2: Statutory and Non-Statutory Consultee Feedback on Melgarve substation

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Statutory		
Historic Environment Scotland (HES)	The Historic Environment Scotland can confirm that they do not consider that the proposed extension to the existing Melgarve substation is likely to have a significant adverse impact on any nationally important heritage assets. Detailed guidance on the application of national policy is set out in their 'Managing Change in the Historic Environment' series. Technical advice is available through Their Technical Conservation website.	This has been noted. Detailed guidance on the application of national policy as set out in HES's 'Managing Change in the Historic Environment' series will be consulted where applicable.
	On the basis of the information currently available, the Council's Historic Environment Team have not identified any potentially significant effects on their interests and therefore no mitigation is recommended.	This has been noted.
NatureScot	NatureScot recommends that an otter survey is undertaken in suitable areas of habitat within 200m of the proposal, in accordance with their guidance.	Otter surveys will be carried out for the River Spey SAC.
	Further information on the protected features including the recently published Conservation Advice Package can be found on SiteLink.	This has been noted, and the recently published Conservation Advice Package on SiteLink will be consulted where applicable.
	NatureScot has a casework agreement with the National Park Authority which states how they will each advise SSEN Transmission on the implications of any proposal. In line with this, NatureScot will provide advice on assessment requirements for the National Park designation.	This has been noted. SSEN Transmission will await further advice on assessment requirements for the National Park designation from NatureScot.
	It is likely that there will be some visibility of the substation extension from within Wild Land Area (WLA) 19 - Braeroy - Glenshirra - Creag Meagaidh. However, at this stage, on the basis of available information, NatureScot considers it is unlikely that there will be impacts of national interest.	This has been noted.
	NatureScot notes that water voles and bats have been recorded in this area previously. NatureScot recommends consideration of these and other protected species and refer the applicants to further advice on our website.	Assessments will be undertaken as part of the EIA/EA report to ensure suitable mitigation is provided to avoid disturbance impacts on protected species, such as water vole and bats.
Scottish Environment Protection Agency (SEPA)	SEPA understands that transformers may be located outside at this development. If this is the case the application should include detailed information, including a clear layout plan, on drainage containment, treatment, discharge and alarming of drainage from transformer areas. In addition, other	The noted details will be included in any proposal, with a Drainage Impact Assessment (DIA) outlining SuDS designs in line with the CIRIA SuDS Manual.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>areas should be treated using SUDS and shown to meet the treatment requirements of the CIRIA SUDS Manual.</p>	
	<p>Development or landraising within any flood plain should be avoided and proposals should generally follow SEPA's Standing Advice for Flood Risk. Should any permanent infrastructure be located within close proximity to a watercourse a Flood Risk Assessment should be submitted to demonstrate that the development is not at risk from flooding and will not increase flood risk elsewhere. SEPA's Technical flood risk guidance for stakeholders outlines the information require to be submitted as part of a Flood Risk Assessment.</p>	<p>Flood plains will be avoided as far as is practicable by the development. Where areas of flood risk cannot be avoided, a Flood Risk Assessment will be provided in line with SEPA's noted guidance.</p>
	<p>Small watercourse crossings should be oversized and larger scale watercourse crossings should be demonstrated to be adequately designed to accommodate the 1 in 200 year flow (including an allowance for climate change and freeboard) to avoid increasing the risk of flooding, or information provided to justify smaller structures. Appropriate riparian buffers should be observed. Storage of materials within this area during construction is not permitted.</p>	<p>Any watercourse crossings will be designed to accommodate 1 in 200 year flow rates. Appropriate buffers will be observed as part of the development design and materials will not be stored within these areas.</p>
	<p>In Accordance with SEPA's Flood Risk and Land Use Vulnerability guidance, this project falls under the category, 'Essential Infrastructure'. Under this guidance, it should be shown that the infrastructure will remain operational up to a 1 in 200-year return period storm event.</p>	<p>The EIA/EA report will include details of the development's ability to weather 1 in 200 year storm events.</p>
The Highland Council (THC)	<p>The Planning Authority are supportive of appropriately located and designed electricity transmission infrastructure, particularly where this facilitates the transition away from the reliance upon fossil fuels towards more renewable forms of energy to meet electricity needs. Such a proposal to help bolster the capacity of the grid is welcome, with the principle of the development being strongly supported.</p>	<p>This has been noted.</p>
	<p>In this instance, although the proposal does not raise any insurmountable concerns at this stage, its ability to avoid any significant adverse effects, remains to be determined.</p>	<p>Noted. Further information will be provided as the design of the developments progress.</p>
	<p>Further landscape and visual assessment is required to help inform the irritative design process which is predominantly driven by operational requirements. The decision to locate additional transmission infrastructure at the site must also be</p>	<p>Noted. Further information will be provided as the design of the developments progress.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	borne out of assessment, which should be considered in parallel with the wider Section 37 application(s) to Scottish Ministers for any connecting overhead lines, and in association with any underground connections which benefit from permitted development rights.	
	Whilst the type and number of future connections remains uncertain at this stage, the Council would strongly encourage SSEN Transmission to consider the strategic positioning of this substation and its ability to accommodate future electricity generation that may arise through not only the wind farm proposals being proposed at present, but also the longer-term demands associated any re-powering of wind farms. Whilst this may be difficult to predict, the design and layout of the proposal should look to future proof the site and consider the associated land take, configuration, drainage, access, and landscaping of future capacity demands; all of which should be set out with the proposal's Design and Access Statement.	<p>The strategic positioning of this substation and its ability to accommodate future electricity generation is being considered by SSEN Transmission as this project progresses.</p> <p>A Design and Access Statement will be included in submission in accordance with The Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009 and The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008.</p>
	Careful consideration must also be given to the surrounding land use change and any measures require to be put in place to help screen the development as far as practically possible from sensitive receptors. The proposal's adverse impact on localised habitat, native woodland, River Spey Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), as well as peat interests, must be mitigated. There will also be the requirement for compensatory tree planting with this provision forming part of a package of measures which help to demonstrate biodiversity net gain.	Careful consideration will be given to the surrounding land use change and any measures require to be put in place to help screen the development as far as practically possible from sensitive receptors. Surveys will be conducted to predict potential adverse impacts associated with the project on localised habitat, native woodland, River Spey Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), as well as peat interests. Mitigation plans to minimise impacts will be put in place. A landscape design plan and compensatory tree planting will likely form part of a package of measures which help to demonstrate biodiversity net gain.
	Whilst any forthcoming application requires to undergo EIA Screening, regardless of if an EIA is required, a number of technical assessments would be required as set out within this response. Notably these include, a Landscape and Visual Impact Assessment (LVIA), Arboricultural Impact Assessment, Transport Assessment, Drainage Impact Assessment and an Ecological Assessment (and Habitat Regulations Appraisal due to the sites connectivity with the River Spey). At this point, there remains the potential requirement for an EIA to be undertaken	The project will undergo EIA Screening, and a number of technical assessments will be completed. These include, a Landscape and Visual Impact Assessment (LVIA), Arboricultural Impact Assessment, Transport Assessment, Drainage Impact Assessment and an Ecological Assessment (and Habitat Regulations Appraisal due to the sites connectivity with the River Spey).

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	as part of the multi-stage consent aspect of the EIA Regulations, however, please proceed submit a screening request for this to be considered further.	
	The proposal is a National Development under the Town and Country Planning (Hierarchy of Developments) Regulations 2009 (As Amended). The presentation of the proposals at the public consultation and application stages will be critical to understanding of the project by members of the public, consultees and elected Members. The LVIA must be undertaken to a high standard with the provision of quality visualisations from agreed viewpoints. The site layout, elevations and section drawings must be comprehensive and a 3D fly-through will be important to explain the development to the community, consultees and elected Members.	This has been noted. The proposal will be presented at the public consultation and application stages to allow understanding of the project by members of the public, consultees and elected Members. LVIA will be undertaken to a high standard with the provision of quality visualisations from agreed viewpoints. As requested by THC a 3D flythrough will be developed for the community, consultees and elected members.
	Based on the submitted information, and subject to consideration of the proposal's landscape and visual impact, it is likely that the Planning Authority would be in a position to support the proposed development, providing that sufficient landscaping / screening could be achieved, and that the Council are also in a position to support the positioning of the related connecting infrastructure, which arguably may have a greater environmental impact, and requires further ongoing detailed consideration.	This has been noted. Full landscape and visual impact assessments (LVIA) will be included within the EIA/EA Report. Further consultation will be carried out with the Planning Authority in regard to these LVIA's and the potential to rationalise overhead lines.
	Highland-wide Local Development Plan (HwLDP) (2012) - Applicable Policies Policy 28 - Sustainable Design Policy 29 - Design Quality & Place-making Policy 30 - Physical Constraints Policy 31 - Developer Contributions Policy 36 - Development in the Wider Countryside Policy 51 - Trees and Development Policy 52 - Principle of Development in Woodland Policy 55 - Peat and Soils Policy 56 - Travel Policy 57 - Natural, Built and Cultural Heritage Policy 58 - Protected Species Policy 59 - Other important Species Policy 60 - Other Importance Habitats Policy 61 - Landscape Policy 63 - Water Environment Policy 65 - Waste Water Treatment	It is noted that the development will be assessed against the applicable policies of the HwLDP.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	Policy 64 - Flood Risk Policy 66 - Surface Water Drainage Policy 69 - Electricity Transmission Infrastructure Policy 72 - Pollution Policy 74 - Green Networks Policy 77 - Public Access	
	No site-specific policies or land use allocations apply for the West Highlands and Islands Local Development Plan (WHILDP) 2019.	Noted.
	Highland Council Supplementary Guidance - Applicable Policies Developer Contributions (Nov 2018) Flood Risk & Drainage Impact Assessment (Jan2013) Physical Constraints (Mar 2013) Roads and Transport Guidelines for New Developments (May 2013) Sustainable Design Guide (Jan 2013) Highland Historic Environment Strategy (Jan 2013) Highland's Statutorily Protected Species (Mar 2013) Trees, Woodlands and Development (Jan 2013) Green Networks (Jan 2013) Onshore Wind Energy (Nov 2016)	It is noted that the development will be assessed against the applicable policies of THC's supplementary guidance documents.
	Scottish Planning Policy and Guidance - Applicable Policies Scottish Planning Policy (Jun 2014 and as amended Dec 2020) National Planning Framework 3, NPF3 (Jun 2014) and consultative draft NPF4 (Nov 2021) Onshore Wind Position Statement Refresh 2021, consultative draft (Oct 2021) Scotland's Energy Strategy Position Statement (Mar 2021) Energy Efficient Scotland Route Map (May 2018) Scottish Energy Strategy (Dec 2017) 2020 Routemap for Renewable Energy (Jun 2011) PAN 1/2013 – Environmental Impact Assessment (Aug 2013) PAN 1/2021 – Planning and Noise (Mar 2011) PAN 60 – Planning for Natural Heritage (Jan 2008) PAN 68 – Design Statements (Aug 2003)	It is noted that the development will be assessed against the applicable policies of Scottish Planning Policy and Guidance.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>Historic Environment Policy for Scotland (Apr 2019) Highland Forest and Woodland Strategy (Nov 2018 / 2006)</p>	
	<p>HwLDP was adopted in 2012 and sets out planning policies applicable for the whole Highland Council area. HwLDP contains the key policies relevant to this proposal, the most relevant are described in this response, but others may apply in the determination of a future application.</p> <p>The Council began a review of HwLDP, with the publication of the Main Issues Report in September 2015 and subsequent consideration of comments in 2016. In December 2017 The Scottish Government published a Planning Bill outlining potential changes to the Scottish planning system. The Council took the decision to halt the HwLDP Review until more was known about the changes. The Planning (Scotland) Act 2019 was subsequently enacted. Further details of the new arrangements for Development Plans are emerging, together with the proposed transitional arrangements.</p> <p>This means that we now expect to take forward review of the HwLDP under the new arrangements for Local Development Plans, with formal work anticipated to start in summer 2022. Applicants are advised to monitor the annual development plans newsletter as this provides a timetable of work on the Highland development plan; the latest newsletter was published in March 2021.</p>	<p>It is noted that the development will be assessed against the applicable policies of the HwLDP, under the new arrangements for Local Development Plans.</p>
	<p>The Highland Council Area Local Development Plan covering the proposed site is the West Highland and Islands Local Development Plan. This plan focus is on the regional and settlement strategies and identifies specific site allocations. As such, much of the content of WHILDP is not directly relevant to this scheme.</p>	<p>It is noted that the Highland Council Area Local Development Plan covering the proposed site is the West Highland and Islands Local Development Plan. The development will be assessed against the applicable policies in this.</p>
	<p>The Cairngorm National Park (CNP) boundary lies a relatively short distance to the east of the proposed site and therefore the Cairngorm National Park Authority (CNPA) are likely to provide a consultation response at any forthcoming planning application stage.</p>	<p>This has been noted. Consultation responses from the Cairngorm National Park Authority (CNPA) will be awaited.</p>
	<p>Since the pre-application meeting, Draft NPF4 has been laid in Parliament and published for consultation running until 31 March 2022. The Council has begun considering the Draft and will prepare and submit its response to Scottish Government.</p> <p>Depending upon the timescale for submission and anticipated timing of</p>	<p>Noted. Should NPF4 be a material planning consideration by the time applications for consent are made it is understood that they will be assessed against its policies.</p> <p>Should NPF4 still be in draft form by the time applications for consent are made it will be considered in the planning statement.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>determination of an application for this development, should you proceed with the proposals, NPF4 may have been finalised and adopted by then and be part of the 'adopted' Development Plan context for consideration. Until such time as NPF4 receives final approval, NPF3 and SPP (both 2014) remain as current national planning policy and material considerations in decision-making. The draft NPF4 may also be a material consideration; the Council has asked Scottish Government whether that is their expectation and, if so, whether Scottish Government has any broad guidance on its application as a material consideration – at the time of writing, a response is awaited.</p>	
	<p>HwLDP Policy 69 (Electricity Transmission Infrastructure) highlights the strategic importance the Highlands will play in generating and transmitting electricity from areas of generation to areas of consumption. Given the size and scale of this proposal, it would likely be considered of significant importance and therefore subject to final site selection, form and design of the connections, it is considered likely that general support for the development would be forthcoming under this policy, subject to balancing and mitigating any detrimental impacts the scheme might create, this includes areas of natural, built and cultural heritage features.</p>	<p>It is noted that the development will be assessed against the applicable policies of the HwLDP.</p>
	<p>A future application is likely to be in overall conformity with the approved Development Plan if necessary site-specific mitigation in respect of visual impact, design, transport and habitat provision is secured.</p> <p>In order to demonstrate overall conformity, the prospective applicant is advised to provide a Planning Statement, Design and Access Statement, Landscape and Visual Impact Assessment which collectively outlines the approach taken to site selection, what alternatives and mitigation measures have been considered / introduced, with more attention in the evolution of the proposed development's design being afforded to the site's sustainable design, natural heritage and landscape.</p>	<p>The development submission will be accompanied by a Planning Statement, a Design and Access Statement, and a Landscape and Visual Impact Assessment. These will outline the approach taken to site selection, and what alternatives and mitigation measures have been considered or introduced.</p>
	<p>The Council recognises the importance of the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, as the legislative tool for addressing Scotland's Climate and Ecological Emergency, which the Council committed to under its own Climate and Ecological Emergency declaration in May 2019. Furthermore, given Highland's land mass and geography make up and renewable energy resources, it is accepted that the area has enormous potential</p>	<p>This has been noted.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>to significantly contribute to the production and transmission of renewable energy. However, this commitment has to be taken in balance along with all other considerations of a particular site. It is appreciated that the proposal would add to the country's ability to transmit renewable energy from generation source; however, development should still be located, sited and designed appropriately.</p>	
	<p>The Council's Sustainable Design Guide SG provides advice and guidance on a range of sustainability topics, including design, building materials and minimising environmental impacts of development. A Sustainable Design Statement is required. The Council encourage the inclusion of electric car charging facilities within all new developments. Should any parking provision be proposed, a strategy for the provision of charging points within the development should be submitted with the application.</p>	<p>The development submission will be accompanied by a Sustainable Design Statement. THC's encouragement to include electric car charging facilities within all new developments has been noted.</p>
	<p>The Council recommends that any application clarifies what resilience these proposals will provide for accommodating anticipated future demands on this substation and set out its intended design life. In considering the extent of any tree felling, landscaping proposals for the site, the location and capacity of SuDS, and extent of ground required to facilitate any extension, scope for any future substation capacity increase should be considered at this stage. This may be particularly helpful when entering into early discussions with affected landowners and securing options for further areas of ground or advanced planning proposals.</p>	<p>The strategic positioning of this substation and its ability to accommodate future electricity generation is being considered by SSEN as this project progresses. The development submission will clarify what resilience these proposals will provide for accommodating anticipated future demands on this substation.</p>
	<p>HwLDP Policy 29 Design Quality and Place Making policy requires new development to be designed to make a positive contribution to the architectural and visual quality of the area. Furthermore, development proposals must demonstrate sensitivity and respect towards the local distinctiveness of the landscape, architecture, design and layouts of their proposals. HwLDP Policy 36 (Development in the Wider Countryside) also supports development in the countryside providing they are acceptable in terms of siting and design and respect the character of the area.</p>	<p>Noted. The design of the development will seek to accord with the principles of Policy 29, supported by LVIA to assess likely impacts on the landscape character and recommend any mitigation measures which may be required.</p>
	<p>As noted above dependent on where Dell would connect, the developer might not have the ability to choose the direction of extension and would have to opt for Option 9. Whilst all options are at the early concept stage, three differing</p>	<p>The comments on each of the options have been noted.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>options have been presented, considering each in turn:</p> <p>Option 1: This scheme will involve extensive engineering works to extend the existing substation platform into a rock face, additionally it will require the diversion of an existing private vehicular access track and possible reinforcement works to one OHL tower. All these works will be extensive and disruptive and cause a prominent visual scar on the landscape, whilst also not reflecting the existing 'linear' nature of the existing substation compound. Corollary, this option is considered to be the less favourable in terms of design and layout out of the three tabled.</p> <p>Option 6: The land to the west runs along the hill slope side and whilst it sits lower than the existing substation platform (which has been levelled and raised previously), the engineering works required to bring it up to the level of the existing compound is significantly less intrusive than proposed in Option 1. The design also reflects and extends the existing linear nature of the existing compound, thus reducing the visual prominence of extending the site. The scheme also results in a smaller western extension than Option 9 (see below) and therefore has a significant lesser impact on the woodland plantation. However, it is understood the limitations the proposed extension has and its inability to accept the Dell electricity and therefore this option is considered the most favourable between Option 1 and 6.</p> <p>Option 9: Building on the proposal in Option 6, this option includes further land-take, which further projects into the woodland area. In addition, it includes a new building to house the new switchgear (little design information has been provided in relation to this building, but it is envisaged it will be sized, designed and coloured to match the others on site). As it will again reflect and extend the linear nature of the existing compound, this option is considered appropriate if the additional land is required. However, this option needs to deliver a design of significant architectural merit whilst achieving the highest standards of Climate & Ecological design, in order to accord with HwLDP Policies 28 (Sustainable Design), HwLDP 29 (Design Quality and Placemaking) and strong environmental</p>	



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>and bio-diversity aspects considered, including a comprehensive landscaping, planting and habitat creation scheme realised as early as possible.</p>	
	<p>As any subsequent application will be considered a 'national development', a Design and Access Statement will be required in accordance with The Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009 and The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008. The Design and Access Statement should outline the design principles and concepts that have been applied to the development and:</p> <ul style="list-style-type: none"> • explain the policy or approach adopted as to design and how any policies relating to design in the development plan have been taken into account; • describe the steps taken to appraise the context of the development and demonstrates how the design of the development takes that context into account in relation to its proposed use; and • state what, if any, consultation has been undertaken on issues relating to the design principles and concepts that have been applied to the development; and what account has been taken of the outcome of any such consultation. 	<p>A Design and Access Statement will be included in submission in accordance with The Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009 and The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008.</p>
	<p>Further advice on the preparation of design statements is contained in the Council's advice note on Design and Access Statements and Scottish Government Planning Advice Note 68.</p>	<p>This has been noted.</p>
	<p>HwLDP Policy 57 considers impacts on natural, built and cultural heritage designations and features. All development will be assessed taking into account the level of importance and type of heritage features, the form and scale of development and any impact on the feature and its setting. Of particular relevance are those landscape and other natural, built and cultural heritage features in proximity to the proposal identified in the constraints maps provided.</p>	<p>It is noted that the development will be assessed against the applicable policies of the HwLDP.</p>
	<p>Ecological concerns of international importance relevant to the development include, but may not be exclusive to, the designated features in the following Natura sites: River Spey Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") apply.</p>	<p>This has been noted.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p><u>River Spey Special Area of Conservation</u></p> <ul style="list-style-type: none"> • Freshwater Pearl Mussel and/or Salmon SACs in the vicinity is the River Spey SAC. • Salmonids are a host species from the freshwater pearl mussel life cycle and their success underpins the population of pearl mussels over time. • To the higher ground to the north of the site are various watercourse which discharge into the River Spey; any cables (either OHL or undergrounding) could impact on the salmon and freshwater pearl mussel population and will need to be understood and suitable mitigations be put in place if required. <p>The SAC lies just south of the proposed substation extension and is protected for salmon, freshwater pearl mussel, sea lamprey and otter. All of these features are sensitive to adverse changes in water quality. Any future proposal would require a high standard of pollution prevention and silt control measures to ensure water quality is maintained, particularly during the construction phase.</p>	<p>This ecological site of international importance has been identified by studies carried out to date and factored into substation site appraisals. Pollution prevention and silt control measures will be considered as part of EIA/EA and appropriate mitigation measures proposed. Appropriate ecological surveys will be carried out for the River Spey SAC.</p>
	<p>If an appropriate Assessment is likely to be required and based on NatureScot's advice, the Planning Authority would encourage the applicant to provide a Shadow Habitats Regulation Appraisal and Appropriate Assessment with their application.</p>	<p>Noted. A HRA will be produced for the River Spey SAC based on earlier comments, however SSEN Transmission will review further consultation responses from NatureScot on any additional HRA works required.</p>
	<p>A Landscape and Visual Impact Assessment (LVIA) will be required. HwLDP Policy 61 Landscape requires new development to reflect the landscape characteristics and special qualities identified in the relevant, refreshed and published (2019) NatureScot. Landscape Character Assessments (LCAs). The LCAs are a starting point on which to base assessment of landscape and visual impact. It is important to set out who the visual receptors of the development are, what the landscape impacts are and how these two factors relate.</p>	<p>A LVIA will accompany EIA/EA submission.</p>
	<p>At this location the assessment of the proposal will need to consider, amongst other aspects: the fit with the existing pattern of development, taking into account the character of the landscape that this site sits within and the height and massing of the proposed substation, as well as the in-combination effects associated with the wind farm connections, including both overhead and</p>	<p>A LVIA will accompany EIA/EA submission. This will take into account the character of the landscape that this site sits within, the height and massing of the proposed substation, the in-combination effects associated with the wind farm connections, including both overhead and underground lines. It will also include cumulative</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>underground lines. It is appropriate to include in cumulative analysis; focusing on those travelling on routes through this area, as well as to surrounding summits.</p>	<p>analysis focusing on travelling routes through the area, as well as on the surrounding summits.</p>
	<p>The Council's Landscape Officer advises that in arriving at a decision on which extension format to take forward, designers should have due consideration to the landscape characteristics of the area and endeavour to create a design which allows a good fit with that landscape. Based upon the details presented at the meeting, it seems likely that a western extension would be the most sympathetic to the general grain of the landscape and is likely to have the best fit to the landform, whilst minimising adverse effects on the existing woodland block. It is recommended that any reprofiling of the ground arising from the works should be designed to be sympathetic to the host landscape rather than purely optimal engineering forms. Any proposed screening from planting should seek to emulate the character of the native tree groupings which are evident within the strath, rather than replicating the conifer plantation. Consideration should be given to extending any compensatory planting into riparian locations, providing increased shade for river water.</p>	<p>A LVIA will accompany EIA/EA submission. This will give consideration to the landscape characteristics of the area and to extending any compensatory planting into riparian locations. The Council's Landscape Officer's preference for a western extension given its potential fit to the landform, whilst minimising adverse effects on the existing woodland block has been noted.</p>
	<p>The proposed extension to the substation is around 2.5km from the CNP boundary and close to the most westerly entry/exit point. It would therefore be beneficial for any future application to consider the effect of the proposals on the Cairngorms National Park, making reference to the Special Landscape Qualities (SLQs). While it is possible that there may be some significant effects on the SLQs of the National Park, at this stage, on the basis of available information, NatureScot considers it is unlikely that these will be of national interest.</p>	<p>The special qualities of the CNP have been factored into the site selection process and will be considered as the project progresses. Potential impacts will be fully assessed as part of LVIA's at EIA/EA stage. Further consultation will be sought with NatureScot following appraisal of alignment options.</p>
	<p>The landscape and visual impacts are key issues which will inform our position in relation to this proposal. Despite this proposal not being a wind farm, visualisations provided for major or national scale developments are expected to accord with the Council's latest Visualisation Standards for Wind Energy Developments and are subject an independent verification check upon receipt. Assessments should cover impacts of all elements of the development, not just the substation but also any connecting infrastructure including any site access works. Applicants are strongly encouraged to provide information on all aspects of their proposal as far as possible at application stage in order that the Council has the fullest understanding of the scheme. In considering nearby receptors,</p>	<p>A full LVIA will accompany EIA/EA submission. Assessments will cover impacts of all elements of the development, including connecting infrastructure and site access works. Where possible, previous viewpoints will be reused in preparation of visualisations of the substation extension.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>any affected Key views identified in the Onshore Wind Energy Supplementary Guidance Sensitivity Appraisal covering the Loch Ness Study Area to the north of the site should be considered, along with LVIA's for the recent wind farm proposals. It would also be helpful to review the information previously prepared and assessed for the original substation. For consistency, previously selected viewpoints should be re-used where these remain appropriate, and the finalised proposed viewpoints should be agreed through further consultation with the Planning Authority and NatureScot.</p>	
	<p>HwLDP Policy 51 (Trees and Development) of the Highland wide Local Development Plan states that 'The Council will support development which promotes significant protection to existing hedges, trees and woodlands on and around development sites. The acceptable developable area of a site is influenced by tree impact, and adequate separation distances will be required between established trees and any new development.'</p>	<p>It is noted that the development will be assessed against the applicable policies of the HwLDP.</p>
	<p>HwLDP Policy 52 (Principle of Development in Woodland) of the Highland wide Local Development Plan states that 'The applicant is expected to demonstrate the need to develop a wooded site and to show that the site has capacity to accommodate the development. The Council will maintain a strong presumption in favour of protecting woodland resources. Development proposals will only be supported where they offer clear and significant public benefit. Where this involves woodland removal, compensatory planting will usually be required.'</p>	<p>It is noted that the development will be assessed against the applicable policies of the HwLDP.</p>
	<p>The Forestry Officer has not had a chance to visit the site since being consulted but having compared the proposals with their scaled aerial photography he would offer the following comments. The proposed development options lie to the north or west of the existing Melgarve substation and would appear to have varying impact on the existing commercial conifer woodland. The woodland is listed in the Native Woodland Survey of Scotland as pole stage pine wood.</p>	<p>This has been noted. The Native Woodland Survey of Scotland has been taken into account throughout the site selection process.</p>
	<p>The amount of woodland loss that would be necessary to develop the proposals would be greater than 0.1ha so the Scottish Government's Control of Woodland Removal policy will apply. Section 218 of Scottish Planning Policy (June 2014) states that the Scottish Government's Control of Woodland Removal Policy includes a presumption in favour of protecting woodland. Removal should only</p>	<p>This has been noted.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>be permitted where it would achieve significant and clearly defined additional public benefits.</p>	
	<p>The applicant provided THC with a Figure showing the Substation Options drawing which shows Options 1, 6 and 9 on the north or west sides of the existing Melgarve substation. Option 1 would not impact on woodland, Option 6 would require a small amount of woodland removal and Option 9 would appear to require at least ~0.45ha of woodland to be removed. This woodland is mapped as 'native woodland' and as a western extension is preferable for siting and design reasons, the impact on this planation will need to be carefully assessed, with appropriate compensatory planting considered.</p>	<p>The impact on any woodland affected by the Proposed Development would be carefully assessed, with appropriate compensatory planting considered agreed through further consultation with the Planning Authority.</p>
	<p>Forestry Officer advises that some consideration would need to be given to separation distance between retained woodland and the proposed development as well as the opening up of a non-windfirm edge which could be susceptible to windblow. The Council Trees and Woodland Supplementary Guidance should be reviewed.</p>	<p>In alignment with The Council Trees and Woodland Supplementary Guidance, consideration will be given to separation distance between retained woodland and the proposed development. The opening up of a non-windfirm edge which could be susceptible to windblow will also be considered.</p>
	<p>It is recommended that the applicant has a woodland survey carried out by a professional arboriculturist/ forester to identify the location, nature and condition of all woodland on and around the site, as well as provide details of its long term retention / management should this be important for mitigating the landscape and visual impacts. The applicant should then use this survey to help inform the layout of the site in order to minimise the impact on existing woodland, if at all possible.</p>	<p>A woodland survey will be carried out and the data obtained used to inform the design of the development to minimise or avoid impacts on woodland.</p>
	<p>The applicant will also need to supply an Arboricultural Impact Assessment (AIA) which clarifies the realistic impact of development proposals on trees/ woodland and a Tree Protection Plan to show how all retained trees are to be safeguard from construction.</p>	<p>An AIA will be prepared as part of the EIA/EA stage to identify likely impacts of the development on trees and woodland areas and lay out a Tree Protection Plan. If any woodland is likely to be lost to development, the required information will be provided as part of the EIA/EA Report.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>The AIA will identify the extent of woodland which would be lost to development and this is highly likely to trigger the Scottish Government's policy on the Control of Woodland Removal. In order to comply with the policy, the applicant will need to: i) identify what significant and clearly defined additional public benefit would be associated with the development; ii) identify the extent of woodland that would be permanently lost to development; and iii) provide details of how the area of woodland that would be lost would be adequately compensated for with an equivalent area of new woodland planting on an un- treed site elsewhere.</p>	<p>The AIA will identify the extent of woodland which would be lost to development and if it would fall under the Scottish Government's policy on the Control of Woodland Removal.</p>
	<p>The development will have an unavoidable impact on peat. The application should be supported by a detailed peat survey report and calculations showing how much peat will be disturbed by the development (broken down into acrotelmic and catotelmic layer) and how and where disturbed peat will be reused on site or elsewhere.</p>	<p>A peat survey will be carried out for the development and the EIA/EA Report will detail the proposed handling and management of peat soils.</p>
	<p>The finalised layout plan should be demonstrated to (1) avoid the areas of deepest peat, (2) keep the footprint of the development as small as possible and (3) use construction methods, such as floating or piling to reduce impact on peat as much as possible. Specific care will need to be taken to determine the location of the construction compound, which if poorly located and designed could disturb more peat than the final development.</p>	<p>The EIA/EA Report will include information on how the developments avoid deep peat and best quality habitats, minimise development footprints and the construction methods to be used.</p>
	<p>More peat may be disturbed than will be required for site reinstatement (and in relation to this we highlight that peat is not a suitable material for landscape bund construction) so consideration will need to be given to what genuine use can be made of the excavated peat. Peatland restoration of adjacent areas seems a possible opportunity. The application should therefore include information on the fate of peat which cannot be used in site reinstatement. This should include clear plans showing the areas where the peat is to be used, a justification for why peat is required as part of these works and a brief explanation of the methods to be used.</p>	<p>The EIA/EA Report will include information on the anticipated reuse of peat which cannot be used in site reinstatement. THC's suggestion that it could be used for peatland restoration of adjacent areas has been noted.</p>
	<p>Given the rural nature of the locality, close by native woodland and watercourses the area around the site is likely to be home to or foraging ground for a number of protected species. Appropriate assessment should be undertaken to ensure</p>	<p>Appropriate assessments will be undertaken as part of the EIA/EA report to ensure suitable mitigation is provided to avoid disturbance impacts on protected species, who are likely to inhabit or forage in the native woodland and watercourses in the areas around the site.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	suitable mitigation is provided to avoid disturbance impacts (including disturbance with undue external lighting around the complex).	
	No potential contaminated land issues are raised by the contaminated land officer.	This has been noted.
	The proposed site is understood to be 2.8 km from the nearest noise sensitive property. Noise is unlikely to be an issue therefore, the Environmental Health Service has no comments to make on this proposal.	This has been noted.
	Any submission should include a Transport Assessment (TA) that sets out the public roads that'll be impacted by the proposed works, with justifications for the suitability of those routes, including any mitigation deemed necessary to support safe construction access. The basic framework for such a TA is provided below.	A TA that sets out the public roads that may be impacted by the proposed works, with justifications for the suitability of those routes, including any mitigation deemed necessary to support safe construction access, will be submitted in the EIA/EA reporting.
	Transport Planning Team accepts that construction access is likely to have the greatest vehicular impact on the local public roads and any assessment should be based on that worst-case scenario. However, any submission should also set out the likely operational access needs during the life of the proposed development, including clarity on the points of access from the public road being left in-place, the form of those accesses and a breakdown of the anticipated type and frequency of traffic needing to use them.	The EIA/EA report will set out the likely operational access needs during the life of the proposed development, including clarity on the points of access from the public road being left in-place, the form of those accesses and a breakdown of the anticipated type and frequency of traffic needing to use them.
	Transport Planning Team will not accept construction access along the U2104 Laggan to Melgarve Road from Laggan, as this is a substandard route not suitable for larger commercial traffic to use. The information provided suggested that access would be taken from the A86 Trunk Road at an existing private access close to the Wolftrax facility. The submission will need to demonstrate that there is an agreement in place for use of that private route for the proposed construction and ongoing operational access needs.	It has been noted that Transport Planning Team will not accept construction access along the U2104 Laggan to Melgarve Road from Laggan, as this is a substandard route not suitable for larger commercial traffic to use. The submission will demonstrate that there is an agreement in-place for use of the A86 Trunk Road at an existing private access close to the Wolftrax facility for construction and ongoing operational access needs in the TA.
	It's Transport Planning Team's understanding that there is a temporary panel bridge across the River Spey adjacent to the public Spey Dam Bridge. If this is correct, we would expect all construction access needs for the proposed OH Line works is taken across that temporary panel bridge. If that temporary bridge will not be available for use during these works, any submission will need to demonstrate that the public Spey Dam Bridge is capable of safely	A TA that sets out the public roads that may be impacted by the proposed works, with justifications for the suitability of those routes, including any mitigation deemed necessary to support safe construction access will be submitted in the EIA/EA reporting. This will include an assessment on any bridges required.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>accommodating all anticipated construction access needs from the south. This should include an assessment into the loading impacts on the bridge and setting out any works required to ensure that safe construction access can be taken over that structure.</p>	
	<p>Any survey information gathered during the current Covid pandemic to determine baseline traffic levels will need to be supported with additional data to determine the likely levels of influence that Covid may have had on such traffic levels. The submission should include full details on the data used and approach taken to determine likely Covid influences, including justification for any assumptions made and any alterations / uplifts applied to surveyed data.</p>	<p>This has been noted. The TA along with the EIA/EA submission for the Proposed Development will include full details on the data used and approach taken to determine likely Covid influences when considering baseline traffic levels.</p>
	<p>When compiling data on predicted traffic movements for this development, the assessment should set out and justify all assumptions made in support of the trip levels used. This includes for example any assumptions made about the amounts of material that may be obtained from borrow pits within or close to the site. However, if insufficient information has been gathered to determine the appropriateness of any material within the site for use in the works, we'll expect the assessment process to have reviewed the worst case scenario of no such suitable materials being found within the site.</p>	<p>The TA along with the EIA/EA submission will set out and justify all assumptions made in support of the trip levels used when compiling data on predicted traffic movements. Assumptions made about the volumes of material that may be obtained from borrow pits within or close to the site will be included, or the assessment process will have reviewed the worst case scenario of no such suitable materials being found within the site.</p>
	<p>Prior to preparation of the TA, the applicant shall undertake a detailed scoping exercise in consultation with the Council's Transport Planning Team and Transport Scotland.</p>	<p>A detailed scoping exercise will be carried out in consultation with the Council's Transport Planning Team and Transport Scotland.</p>
	<p>Any requirements for abnormal loads associated with this development will need to be identified in the submission, including clarifying the routing of those AIL's to and from the development site. A review of the preferred routing should also include consideration of any structures along the proposed route. Its Transport Planning Team's understanding that the existing Spey Dam public bridge is deemed unsuitable for abnormal load vehicles.</p>	<p>A TA that sets out the public roads that may be impacted by the proposed works, with justifications for the suitability of those routes, including any mitigation deemed necessary to support safe construction access will be submitted in the EIA reporting. The limitations of the existing Spey Dam public bridge are noted.</p>
	<p>The TA should include a Framework Construction Traffic Management Plan (CTMP) aimed at minimising the impact of the construction-related traffic on all other users of the local public roads in that area, including any measures deemed necessary to protect the safety of cyclists and pedestrians. This should recognise that public roads in this area are heavily influenced by tourist traffic.</p>	<p>A CTMP will be included within the TA. This will address the noted points, but may have limitations/caveats as some aspects will require input from the Principal Contractor who may not have been engaged at the time of consent application. As such, SSEN</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>Measures proposed in a CTMP will be supplementary and complementary to any physical road improvements deemed necessary to achieve safe construction access. The development of a CTMP should give consideration to the following:</p> <ul style="list-style-type: none"> • Avoid HGV routing in the vicinity of local schools, particularly during school opening and closing times. • No conveying of HGV or site staff vehicles. • Agreed routes to be used by all site staff, contractor, sub-contractor and deliveries. • Clarify the steps that will be taken to deter / prevent construction traffic using non-designated routes to and from the site. • Providers of products and materials to this development (e.g. aggregate or concrete, staff mini-buses if used etc) should mark their vehicles with a unique number identifier on the front, sides and rear of the vehicles and a Melgarve substation identifier. This enables easy identification in the event of problems arising, such as speeding or discourteous driving, as registration number plates are difficult to obtain. It also helps to avoid issues with traffic from other developments being wrongly associated with this proposal. • Setting up a single point of contact for local residents to use in the event of problems or concerns, such as in the above bullet point. This should be telephone and website details as a minimum, with consideration of Twitter and Facebook as appropriate. All such details should be provided to Community Councils for their notice boards and websites. • Toolbox talks established with all suppliers, contractors, site staff etc to encourage careful and courteous driving at all times. Particular attention should be made to driving through all villages and settlements, with cognisance of relevant speed restrictions and local conditions/limitations of the road network. 	<p>Transmission may need to request a CTMP as a condition of consent.</p>
	<p>To ensure that arrangements are in place to protect the Local Roads Authority from having to fund repairs from any damage incurred to the local public road network as a result of these works, we would expect any proposal to enter into a formal Section 96 'Wear & Tear' Agreements (Section 96 of the Roads (Scotland) Act 1984) with Highland Council, if there are sections of the local public road network being used to access this development.</p> <p>As with CTMP's, we would see this as supplementary to any physical</p>	<p>As a separate agreement to the Section 37 consent process, a legal agreement between the roads authority and SHET will be pursued based on discussions around the requirements of Section 96 with the Highland Council for provision of a wear and tear agreement as part of pre-application consultation.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>improvements deemed necessary to make the local public roads safe and usable by all, including by construction related vehicles.</p>	
	<p>The proposal for any new or upgraded access points onto the local public road network shall be detailed on dimensioned drawings including radii, surfacing and drainage as well as the required visibility splays in accordance with the Highland Council's Roads and Transport Guidelines for New Developments.</p>	<p>The TA will include plans detailing surfacing, drainage and visibility splays with relevant dimensions included, in line with THC's noted guidance.</p>
	<p>The intended location of site compounds / offices, material stores, loading and unloading areas, workforce parking areas and the routes connecting them to the public road network should be clearly identified in any submission made. The submission should also define the private off-road access routes that'll be used to access the site, clearly defining which routes are intended to be left in-place and which will be removed when no longer required. The finished form of any routes being left in-place should be clarified, with justification why they will be needed in that form going forward.</p>	<p>The noted details will be included as far as possible in the EIA/EA reports / TA; however, it should be noted that these details are generally determined by the Principal Contractor who is engaged following granting of consents. Outline plans will be included and later updated once further details are known from the Principal Contractor.</p>
	<p>TA Methodology - 1 Identify all public roads affected by the development. It is expected that the developer will submit preferred access route(s) for the development, both for any required abnormal loads and for general construction traffic, staff and suppliers. All other possible access route options should be identified, having been investigated in order to establish their feasibility. This should clearly identify the pros and cons of all the route options and therefore provide a logical selection process for arriving at the preferred route(s).</p>	<p>The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.</p>
	<p>TA Methodology - 2 Set out the existing nature and condition of these public roads. This should include:</p> <ul style="list-style-type: none"> • The road name and number, where applicable. • Road widths, including any pinch points. • The nature of their horizontal and vertical alignments, including any known steep gradients. • An appraisal of the carriageway strength including, where necessary, construction depths and road formation where there is likely to be significant impacts. 	<p>The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<ul style="list-style-type: none"> The location of any structures either spanning or supporting the roads, including a description of their nature (eg bridge, culvert etc), any width, and height or weight restrictions and where necessary, an assessment of their load carrying capability. This work should be undertaken by a suitably capable and qualified consulting engineer acceptable to The Council. <p>The nature and quantum of properties and other development types serviced by the roads. In addition to the quantum of residential properties, specific recognition should be made of any sensitive facilities such as schools, businesses or other community facilities along the roads.</p> <ul style="list-style-type: none"> The nature and quantum of existing traffic flows on these roads. This should include reference to how often the roads are used by school or commercial bus services and whether the routes are used by pedestrians, cyclists and equestrians. Our Public Transport Team may be able to assist with info on school and scheduled bus services. 	
	<p>TA Methodology - 3</p> <p>Identify the anticipated impacts from the proposed development, including any cumulative impacts from other developments that have the potential to be happening at the same time. These impacts should include:</p> <ul style="list-style-type: none"> The quantum of new traffic impacting on these roads throughout the construction, operation and decommissioning periods of this development. This should cover: <ul style="list-style-type: none"> numbers of light and heavy vehicles (differentiated) numbers of abnormal loads profiles of anticipated new traffic movements throughout the duration of the works Any impacts to existing carriageways, structures, verges or other aspects of these public roads. This should include information on swept paths and gradient analysis where it is envisaged that the passage of traffic could be problematic. The location of any new or changes to existing accesses off these public roads to be used for accessing this development. This should include the extent of existing visibility from each of the accesses onto the public roads. Any impacts or restrictions needing to be imposed on existing road users. Any impacts or restrictions needing to be imposed on adjacent properties or local communities serviced by these public roads. 	<p>The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>TA Methodology - 4</p> <p>Set out the proposed mitigation measures needed to tackle the anticipated impacts set out above. This should include:</p> <ul style="list-style-type: none"> • The location and nature of any carriageway widening or strengthening. • Works to improve the visibility at proposed access points with public roads and at junctions along the proposed access routes. • The location and nature of any strengthening or widening needed to existing structures. • The provision of new or enhanced passing places on single track roads. • Road safety measures deemed necessary to effectively manage the impacts of any identified road safety issues. • Traffic management proposals deemed necessary to enhance compliance with the traffic management plan associated with the construction and ongoing operation of this development. <p>It should also be noted that any physical mitigation required may need to be specifically considered within the wider considerations of an EIA, depending on the form, scale and location of the works proposed and their potential impacts to any existing environmentally sensitive sites.</p>	<p>The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.</p>
	<p>TA Methodology - 5</p> <p>Details of any residual effects on the road network and its users following the implementation of the proposed mitigation outlined above and any actions proposed associated with those residual effects.</p>	<p>The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.</p>
	<p>The information above related to transport is not exhaustive and should be used as a guide to submitting information relating to local roads, traffic and transportation matters arising from the development proposals, which should be in the form of a TA forming part of the Environmental Impact Assessment.</p>	<p>The TA accompanying the EIA/EA reports will follow the above points as a guide and include any further pertinent information beyond these.</p>
	<p>Public access all the way along the existing track should be accommodated before, during and on completion of this proposal. From the Spey Dam in the east the track will have become the de facto public right of way HB33 to Garva Bridge. It also incorporates elements of HB31 to Glen Markie and HB32 to Laggan. Public access to and along those routes must be accommodated before, during and on completion of the development. Site managers, site security and contractors should be made aware of the public's right to use those</p>	<p>EIA/EA reporting will include assessment of the Proposed Development's impacts on recreation. It has been noted that from the Spey Dam in the east the track will have become the de facto public right of way HB33 to Garva Bridge, and that it also incorporates elements of HB31 to Glen Markie and HB32 to Laggan. Public access to and along those routes will be accommodated before, during and on completion of the</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>routes. In turn the public might be warned to expect construction traffic while using those routes. There have been a few misunderstandings in the past which could be avoided by good communication.</p>	<p>development. Site managers, site security and contractors will be made aware of the public's right to use those routes. In turn the public might be warned to expect construction traffic while using those routes.</p>
	<p>The existing access track also crosses the path to the Corbett Meall na h-Aisre. That access was successfully maintained during previous development but the Access Officer would ask the applicant to consider improving the paths approaching the track. That may involve some minor drainage and surfacing to the short lengths of path next to the track. This has the advantage of focussing the public on one attractive crossing point and helping access management.</p>	<p>EIA/EA reporting will include assessment of the Proposed Development's impacts on recreation. The path to the Corbett Meall na h-Aisre will be featured in this assessment, and the potential for some minor drainage and surfacing to the short lengths of path next to the track will be considered.</p>
	<p>Westwards and closer to the development it appears that the public have taken to using the Stronelairg track to walk and cycle the approach to Meall na h-Aisre. They are likely to explore the link all the way to Stronelairg too if they have not done so already.</p>	<p>This has been noted.</p>
	<p>If the track by the development is to be diverted around an extension the Access Officer asks that the public are accommodated on that diverted track too and that the diversion is available to them before the original route is closed.</p>	<p>EIA/EA reporting will include assessment of the Proposed Development's impacts on recreation, and if the track by the development is to be diverted around an extension, the public will be accommodated on that diverted track.</p>
	<p>HwLDP Policy 66 (Surface Water Drainage) requires new developments to utilise Sustainable Drainage Systems (SuDS) to return all surface water back to the natural water cycle in a sustainable manner. A DIA is required. The DIA should include details relating to any existing field drains and the management of surface water drainage, which should be designed in line with general Sustainable Drainage Systems (SuDS) principles. The applicant should demonstrate, within the proposals submitted, any mitigation measures to manage the residual risk of overland flow/pluvial flooding.</p>	<p>A Drainage Impact Assessment will accompany the EIA/EA reports along with details of SuDS designs, where required. Any other mitigation measures necessary to manage residual flood risk will also be set out within the reports.</p>
	<p>Natural flood management techniques should also be applied to reduce the rate of runoff where possible. Access roads should not act as preferential pathways for runoff and efforts should be made to retain the existing drainage network. Appropriate drainage is required to restrict runoff to pre-development rates and to minimise erosion to existing watercourses. The DIA should ensure that post development runoff rate is no greater than pre-development runoff rate (i.e.</p>	<p>The DIA will include details of flood management techniques to reduce runoff rates and avoid access roads or underground cable routes becoming preferential pathways. Appropriate drainage measures will be implemented.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	greenfield runoff) for all return periods up to the 1 in 200 year event including an allowance for climate change.	
	Runoff from all events up to and including the 1 in 200 year plus climate change event should be managed within the site boundary, with no flooding to critical roads or buildings, and evidence as to how this will be achieved should be included within the DIA.	The DIA will include details of flood management techniques, including up to a 1 in 200 year event and how increased flooding to critical roads or buildings will be avoided.
	Whilst it is anticipated that the level of foul drainage will be minimal and primarily relate to the welfare facilities on site (and only if new/enlarged facilities are required), HwLDP Policy 65 (Waste Water Treatment) sets a preference for foul drainage to be discharged to the public sewer. However, if unavailable, details of any private means should be provided.	The development will be assessed against the applicable policies of the HwLDP, including HwLDP Policy 65 (Waste Water Treatment) and details of foul drainage handling provided.
	An NVC survey should be carried out of the site and within 250m from any proposed infrastructure. The development should avoid direct impacts on any rare groundwater dependant habitats and protect their water supply. If relevant the mitigation measures required to protect surrounding GWDTE habitats from the impacts of development (such as drying out) should be outlined.	An NVC survey will be carried out within 250m of all proposed infrastructure. Rare GWDTE habitats will be avoided as far as practicable with mitigation measures proposed where avoidance is not possible.
	Refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further general advice on the assessment of GWDTE.	Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems will be referred to for further general advice on the assessment of GWDTE.
	The Council's Developer Contributions Supplementary Guidance will be used in the determination of planning applications and requires all development, including single house developments, make proportionate financial developer contributions towards meeting service and infrastructure needs in areas of Highland where clear deficiencies are identified. For the proposed development, the anticipated developer contribution requirements are outlined below. Please note that requirements can change over time and the exact amount payable will be confirmed at the point that a planning application is determined. Industrial (including energy) developments are exempt from education, community facilities and affordable housing contributions. They may however be	Noted. However, as a Statutory Undertaker who is regulated by OFGEM, SHE Transmission must provide robust justification for all costs on the development. Therefore, any contributions can only be limited to those which are required to facilitate the construction and/or operation of the Proposals.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>required to contribute towards Transport, Green Infrastructure, Water & Waste and Public Art.</p>	
	<p>The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 require that for any major or national development, pre-application consultation must be undertaken. This requires a formal Proposal of Application Notice (PAN) to be submitted to the Planning Authority at least 12 weeks prior to any formal planning application being lodged and any subsequent planning application must be accompanied by a Pre-application Community Consultation (PAC) report. Whilst any overhead line would be a Section 37 application, the substation extension triggers the need for the above measures to be followed. In consulting on the substation, it would be beneficial if the PAN, content of any consultation, and PAC report also covered the connection proposals.</p>	<p>A PAN will be issued no less than 12 weeks prior to applications for consent. This will be accompanied by a PAC Report.</p>
	<p>Public consultation should be undertaken as the proposals develop to help both gauging the opinion of the local community and also scoping potential areas of conflict which could be addressed prior to submission of the application. When carrying out community consultation we recommend that full consideration is taken of Scottish Government Planning Advice Note 3/2010 - Community Engagement. This includes the standards for community involvement which should be adhered to.</p>	<p>Public consultation has been and will continue to be undertaken throughout the development design process. Details of the first public consultation events for the routeing stage are detailed later in this Report. The standards for community engagement will be observed.</p>
	<p>It is advisable to take into consideration all of the comments made by members of the public before a planning application is submitted to ensure that the public feel they have had an influence over the proposals. For public consultation it may be useful to use the SP=EED tool developed by Planning Aid Scotland. This builds on the Standards for Community Engagement set out in PAN 3/2010.</p>	<p>Noted. SSEN Transmission will take into consideration all of the comments made by members of the public before a planning application is submitted. Responses will be set out in the PAC Report.</p>
	<p>Please note that during the Covid-19 pandemic there are exemptions related to Pre-Application Consultation with members of the public. If you are bringing forward your project in the coming months then it is highly recommended that you discuss these with the Case Officer at the earliest possible opportunity. It is expected for a development of this scale to undertake more than one online consultation event, with this to contain a live element, and to ensure that the events are widely publicised with a letter invitations to be sent to all properties in</p>	<p>Plans for public consultation events will be discussed with the Case Officer, with multiple events held to ensure all interested individuals can attend. These will be widely advertised with a particular focus on nearby residents and businesses. Responses will be set out in the PAC Report.</p>



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>the locality, including any residents or businesses who would regularly use routes which bypasses the site.</p>	
	<p>The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011 requires the proposal to be screened to determine whether an Environmental Impact Assessment (EIA) is required to support a planning application. Whilst electricity substations are not explicitly listed within either Schedule 1 or Schedule 2 of the aforementioned regulations, a broad interpretation of the scope of the EIA Regulations must be adopted. Under Schedule 2, 'Energy Industry' projects relating to the transmission of electricity by overhead cables where the area of work exceeds 1ha, the project must be screened to determine if any significant environmental effects are likely to arise by virtue of the factors such as size, nature or location. A formal request for a Screening Opinion should be made in writing to the Planning Authority well in advance of the application's submission. An EIA Screening Opinion form can be downloaded from the Councils website by following the link below. At present it is not possible to do this online.</p>	<p>EIA Screening requests will be made for the substation extension to determine the need for full EIA. This will be made well in advance of the application.</p>
	<p>In terms of the appropriate Community Councils to consult, the proposal is located within the Stratherrick and Foyers Community Council area. A development of the nature proposed may affect a number of adjacent Community Councils, as such it is recommended that adjacent Community Councils are also consulted, particularly any neighbouring areas which would be impacted by construction related traffic or those which would have visibility of any overhead line. The Ward Manager of Laggan Community Council, Liz Cowie can provide advice further in this regard if required.</p>	<p>Community councils have been and will continue to be consulted on the proposals. As noted later in this Report, the community councils attended the routeing stage public consultation event and SSEN Transmission has undertaken further direct consultation with the Laggan community council.</p>
	<p>It would be beneficial to at this stage consult with the local Disability Access Panel. The contact details for your local panel are: Badenoch and Strathspey Access Panel, c/o VABS, 2 Inverewe, Grampian Road, Aviemore, PH22 1RH. Telephone: (01479) 810004. For advice in relation to the removal of barriers and the promotion of equal access for all people affected by disability for your development contact the Scottish Disability Equality Forum, 12 Enterprise House, Springkerse Business Park, Stirling, FK7 7UF. Telephone: (01786) 446456.</p>	<p>Public access requirements will be covered off by way of the Access Management Plan as noted above. A Design and Access Statement will be included in submission in accordance with The Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009 and The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Non-Statutory		
Transport Scotland	<p>The existing substation is located approximately 15km from the A86(T) at Laggan. Given the distance of the substation from the trunk road, Transport Scotland would consider it unlikely that the construction of the extension will cause any perceivable impact on the trunk road, however, in the event that abnormal loads are required to deliver substation components, Transport Scotland will require to be satisfied that these can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.</p> <p>If such loads are to be used, an Abnormal Loads Assessment report will be required which will identify 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. Transport Scotland would also state that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager.</p>	<p>An Abnormal Loads Assessment report will be provided with the TA which is included within the EIA/EA report which will identify key pinch points on the trunk road network. Swept path analysis will be undertaken and details provided with regard to any required changes to street furniture or structures along the route will be included.</p>

6. COMMUNITY CONSULTATION RESPONSES FROM THE VIRTUAL PUBLIC EXHIBITION EVENTS

6.1 Introduction

6.1.1 **Table 6.1** sets out the feedback received from the local community and general public during the live virtual consultation events held in January 2022. Responses by SSEN Transmission are also included, setting out the action to be taken where relevant. The table has been split into comments regarding the connections, Melgarve substation and general project comments.

Table 6.1: Public and Local Community Feedback by Topic

Feedback Comments	Response by SSEN Transmission
Grid Connections	
<p>Queries were raised in relation to use of underground cable for only the Glenshero connection and whether the choice of OHL or UGC was made by the developers or by SSEN Transmission. A further request for clarification was made on whether SSE, as the developer of Stronelaig Wind Farm, had opted for UGC.</p>	<p>SSEN Transmission's licence obligations are to develop an efficient, co-ordinated and economical system of electricity transmission. As such SSEN Transmission is obliged to seek the most cost-effective solution, which is usually an OHL. The developer can opt for an underground cable connection, in which case the developer is liable for the additional costs associated with the cable connection. this option has been selected by Glenshero and Stronelaig.</p> <p>Stronelaig Wind Farm has already been built and is not part of this proposal.</p>
<p>The factors determining the use of OHL or UGC were queried, including how much influence the cost of each option had in the choice.</p>	<p>Overhead lines are generally preferable for maintenance reasons. In the event of a fault on an overhead line, the fault can be detected and rectified in a matter of days; however, if the fault occurs in an underground cable the time needed to locate and rectifying the fault increases and could potentially take months to fix. In a worst-case scenario, whole sections of cable may need to be replaced resulting in temporary disturbance to landowners and the local environment whilst these works are undertaken.</p> <p>Installation of underground cables require a larger footprint than an OHL. The construction of a steel lattice tower typically requires a temporary compound of 50 metres by 50 metres, with associated temporary access linking them to the nearest permanent track or road. In comparison a typical cable installation requires a trench, approximately 6 m wide and 1.5 m deep, to be excavated along the entire route for each circuit installed. This would sit within a construction corridor at least 30 m wide which includes a haul road and storage areas for topsoil and subsoil which are excavated and then backfilled into the trench once the cable is installed. This could potentially increase disturbance to landowners and the local environment during construction.</p> <p>It is acknowledged that further detailed environmental and engineering survey work will be required to find an acceptable OHL alignment and design solution through this sensitive landscape and environment, which could result in a review of the preferred route option and/or use of appropriate localised mitigation methods, such as underground cable</p>



Feedback Comments	Response by SSEN Transmission
	sections. In deciding the appropriate mitigation, Technical, Environmental, Cost and feedback from consultation will all be considered.
It was noted that use of OHLs for Cloiche and Dell wind farms would be irrational when Stronelairg and Glenshero wind farms have opted for UGC connections, and may prompt Glenshero Wind Farm to switch to OHL connection.	Use of OHL connections for Dell and Cloiche wind farms is SSEN Transmission's contracted position as set by the wind farm developers. Further detailed environmental and engineering survey work will be required to find an acceptable OHL alignment and design solution through this sensitive landscape and environment, which could result in a review of the preferred route option and or use of appropriate localised mitigation methods, such as underground cable sections. In deciding the appropriate mitigation, Technical, Environmental, Cost and feedback from consultation will all be considered.
Queries were raised in relation to the OHLs being single or double circuit and whether the extra arms on double circuit towers may encourage additional wind farm development in the future.	<p>Although the OHLs currently proposed are single circuit connections, the OHL towers shown are double circuit towers and are indicative of the suite of towers that may be used. Further development of OHL towers is required as the project progresses as further technical and environmental studies are undertaken. The overhead line conductor selection study is currently ongoing and the output from this will define the potential maximum capacity of each line.</p> <p>SSEN Transmission only build to what we are contracted to provide. There is an opportunity being explored to combine both single circuit OHLs onto one double circuit tower line. This is under review, and SSEN Transmission hope to report back on the outcome of this review at the next consultation.</p>
Concerns over double circuit steel lattice towers strung with single circuit connections have not been adequately addressed.	Noted. Additional information will be provided in future public exhibitions on the design choices made as part of the proposals.
If OHL connections are deemed to not be feasible for technical reasons only, single circuit steel lattice towers should be used until a point at which both connections can be supported on a single set of double circuit steel lattice towers and continue as such until Melgarve substation.	The recommendation is noted. Single vs double circuit tower design is an ongoing consideration in the design development process.
The reason for not using wood poles rather than steel lattice towers was queried, with suggestions on how wood poles could be made suitable by using	<p>Due to the altitude of the route, ice loadings and wind speeds experienced between the wind farms and Melgarve substation, wood poles are not suitable.</p> <p>SSEN Transmission follows recognised UK and international specifications and standards as well as its own internal specifications when it comes to design works. In this case the</p>



Feedback Comments	Response by SSEN Transmission
different materials or additional stays.	wind speed is calculated from the land height / topography and not the relative height of the overhead line structure to the ground, hence wind speeds are calculated the same for each structure at a certain point on the ground. The combination of wind and heavy ice loading mean that spacing between wood poles at the altitudes present at Melgarve become unfeasible. There is a separate innovation project being developed to look at using steel poles as replacements for wood poles in high altitude situations but that has only recently been submitted via the innovation funding system and therefore has not yet had any technical development carried out to allow it to be considered here at this stage.
The reason for not using single circuit pylon designs for single circuit connections was queried.	<p>Modern single circuit arrangements consist of a double circuit pylon with a single circuit strung which can allow for a separate additional circuit to be added at a future time with minimal extra work to the towers on the route thus somewhat future proofing a single circuit design. This also allows for more standardisation of the pylon suite.</p> <p>Historic single circuit towers tend to have a delta formation (two arms on one side and one on the other) or be arranged horizontally. SSEN Transmission don't have any modern single circuit tower designs in use for new lines.</p> <p>SSEN Transmission chose to show a picture of the double circuit pylon as the connection for Cloiche and Dell follow the same preferred route which gives the opportunity to combine both onto one double circuit pylon. This opportunity is under review, and SSEN Transmission aim to report back on the outcome of this at the next consultation.</p>
It was queried whether SSEN Transmission has future connection contracts with the wind farm developers.	SSEN Transmission do not have future connection contracts with Cloiche, Dell and Glenshero.
The difference in cost between an OHL and UGC was queried.	UGC is more expensive than OHL. The cost ratio between OHL and UGC can be affected by a number of different factors such as technology type (double or single circuit), ground conditions, altitude, access, etc. UGC can range between being 10 % to 100 % more expensive than OHL.
It was suggested that a number of comments may be forthcoming on the visual impacts of the OHL and that visualisations would be desired.	Visualisations of the OHL can be provided once the project has been sufficiently developed. Detailed Landscape and Visual assessments will be undertaken for any forthcoming applications for s37 consent and planning permission.
Clarification was requested on the consenting process for OHLs and UGCs and whether the class of planning consent determines the connection type.	A new OHL requires a Section 37 consent. UGC connections are generally covered under permitted development unless the works are within or in proximity to a designated area, in which case they may be subject to a planning application to the local planning authority.



Feedback Comments	Response by SSEN Transmission
	<p>The class of planning consent does not dictate the connection technology. The connection technology is selected first and from this the type of consent is selected.</p>
<p>It was noted that the proposed routes figure was difficult to understand, and clarification was requested of the route options under consideration.</p>	<p>SSEN Transmission apologise that it was not clear to see, there is a pdf copy of this map available on the website below. This map shows all of the route options that were appraised for the connection of Dell to Melgarve, Cloiche to Melgarve and the one route option for the connection of Glenshero to Melgarve. A summary of these options is given below. More detailed descriptions can be found in the Consultation Document (November 2021) also published on https://www.ssen-transmission.co.uk/projects/melgarve-cluster/.</p> <p>Cloiche Wind Farm Connection options (shown in orange hatching):</p> <ul style="list-style-type: none"> • Route Option C1 represents the most western route option • Route Option C2A and C2B are the more central options of those considered for the Cloiche connection. The routes travel in a generally southern direction, away from the proposed Cloiche Wind Farm on-site substation to Melgarve substation • Route Option C3 travels in a generally eastern direction for approximately 3 km where it would overlap with the route of the proposed Route Option G1 travelling south towards Melgarve substation for approximately 5 km. <p>Dell Wind Farm Connection (shown in green hatching):</p> <ul style="list-style-type: none"> • Route Option D1 connects the proposed Dell Wind Farm on-site substation to the operational Melgarve substation via one of the proposed Cloiche Route Options as noted above. Route Option D1 represents the more western route option of the two options considered for the Dell connection. • Route Option D2 connects the proposed Dell Wind Farm on-site substation to the operational Melgarve substation via the area surrounding the proposed Glenshero on-site substation. Route Option D2 represents the more eastern route option of the two options considered for the Dell connection, leaving Dell substation and travelling in a south south-easterly direction where it would overlap with the route of the proposed Route Option G1 travelling south towards Melgarve substation for approximately 5 km. <p>Glenshero Wind Farm Connection (shown in purple hatching):</p> <ul style="list-style-type: none"> • Route Option G1 connects the proposed Glenshero Wind Farm on-site substation to the operational Melgarve substation. It travels South from Glenshero Wind Farm on-site substation to Melgarve substation.
Melgarve substation	
<p>The current and future size of Melgarve substation was queried, along with its potential</p>	<p>The current site is approximately 2.8 ha (this is the area within the substation fence-line boundary and does not include external slopes). The draft design at this stage anticipates the Melgarve substation to</p>



Feedback Comments	Response by SSEN Transmission
visibility following completion of works and its current and future capacity.	<p>require an extension of 25 % of the current site. This is subject to detailed design works with the aim to minimise this as much as possible. SSEN Transmission do not anticipate the extension will make the development any more visible; however, further detailed design, and landscape and visual assessments, will be undertaken in due course to confirm this.</p> <p>The current Stronelairg Wind Farm connection to Melgarve has an output of 227.8 MW. The contracted total of the three proposed new wind farms is 417.8 MW thus giving a potential overall total of 645.6 MW. SSEN Transmission unfortunately cannot provide a definitive number on Melgarve substation's capacity at this time; it is affected by a number of different factors such as the level of redundancy, security, etc. required by the transmission system.</p>
Further information was requested on the extension of the substation, such as the size of ground footprint, electrical infrastructure required, and landscaping works proposed.	Design options are currently being developed in order to provide the optimal design solution. This will allow detailed drawings to be submitted as part of the formal planning consent application. In order to connect all three windfarms, Melgarve substation must be expanded to accommodate two new transformers and associated connection infrastructure. Various configurations are being considered, all options require the extension of the platform.
Comments were raised noting that the community had previously been advised Melgarve substation had sufficient capacity for all wind farms at the planning stage and asked for clarification.	Previous statements about the capacity of Melgarve substation would have reflected the planning situation at the time. The project team are currently investigating the options to connect the three wind farms into Melgarve substation, with several options being investigated at present. Optioneering assessments are ongoing at this time, however Melgarve substation does not have sufficient capacity to accommodate all three wind farms currently in planning in the area.
General Project	
The total value of the project was queried as well as the funding mechanism.	<p>SSEN Transmission cannot disclose the project value at this moment in time.</p> <p>The developer associated with each connection will fund some of the costs, while other costs are initially borne by SSEN Transmission and recovered via Ofgem funding mechanisms. SSEN Transmission can provide further detail if required.</p>
A query was raised in relation to the duration of construction of the project.	Construction of the current scope of work is estimated to be completed in approximately three years. This is based on all three wind farms materialising and on their current connection dates. Should any wind farms vary their connection dates or fail to materialise then this may change.
It was queried whether any objections had yet been made by any outdoor groups of other public bodies to the project.	No objections have been made by outdoor groups or other public bodies to date.



Feedback Comments	Response by SSEN Transmission
<p>Queries were raised as to the current planning status of the wind farms to be connected and the impacts on the Melgarve Cluster project if these wind farms should fail to receive consent or be developed.</p>	<p>Cloiche Wind Farm is still to receive planning permission. Dell Wind Farm has been consented. Glenshero Wind Farm is currently in the appeals process and the developer is awaiting determination by the Scottish Ministers.</p> <p>If Cloiche Wind Farm were to be refused planning permission the overall project would not change unless the developer terminates their construction agreement with SSEN Transmission. If they were to terminate then it is likely that the extension of Melgarve Substation would not require to be as large; however, this would need to be reviewed against the requirements of the other connections.</p> <p>If the Dell developer terminates their construction agreement with SSEN Transmission then all transmission infrastructure associated to the Dell connection would not be required, i.e. the OHL connecting Dell to Melgarve will not be required.</p> <p>If the Glenshero developer terminates their construction agreement with SSEN Transmission then all transmission infrastructure associated to the Glenshero connection would not be required, i.e. the UGC between Glenshero and Melgarve will not be required.</p>
<p>Concerns were raised in relation to potential disruption of the community and tourism in the area. Proposed mitigation measures to reduce disruption were requested.</p>	<p>Assuming planning is approved, construction will start in 2023 and go through to 2026. Construction Traffic Management Plans will be implemented during the construction period to limit the impact on residents and road users. SSEN Transmission will set up a Community Liaison Group prior to construction starting. This is in order to keep the local community and businesses up to date with construction activities during the construction period. SSEN Transmission will also look to coordinate with wind farm developers to ensure impacts are managed.</p>
<p>Concerns were raised in relation to potentially disruptive transport effects for nearby settlements and roads during construction and no information was presented on intended routes or duration of transport movements. It was noted that the community is very sensitive to transport disruption, based on previous experience with development in the area and use of small and private routes which have only recently been made available to the community again.</p>	<p>The transport assessments and development of construction traffic management plans will be undertaken at a later stage in the development of these projects, in advance of the submission of planning applications. However, SSEN Transmission would anticipate the same transport routes to be used as previous projects. This is all subject to detail design and feedback from the consultation phases and planning application process. If the previous route is the preferred solution then it is likely that there will not be any need for additional construction or upgrade required, therefore disruption will be limited to traffic using the accesses.</p> <p>Consultation with the roads authority and Community Liaison Group will be undertaken in due course and SSEN Transmission's projects are normally undertaken with a planning condition of working times which are agreed with the local council.</p> <p>At this stage in the project, SSEN Transmission does not have defined design information to be able to provide detailed transport plans. If there are particular areas of concern, SSEN Transmission would be happy to meet the community to discuss further.</p> <p>SSEN Transmission are in communication with Jahama Estate as landowners of Glenshero Wind Farm and will coordinate with them during</p>



Feedback Comments	Response by SSEN Transmission
	the construction period to make sure impact to the communities is minimised.
<p>Queries were raised in relation to public rights of way, any restrictions that may be imposed during construction, and whether there would be an opportunity to comment on outdoor access plans given another nearby developer's failure to do so and blocking an old right of way with locked gates.</p>	<p>SSEN Transmission would not anticipate that access for public recreation would be adversely affected by works. As part of pre-commencement documentation an outdoor access plan will be developed and implemented during construction.</p> <p>SSEN Transmission will consult locally on the outdoor access plan. If there are particular areas of concern, please respond on the feedback form so these can be included.</p> <p>If required, SSEN Transmission are happy to meet with the community to discuss this further.</p>
<p>Potential for financial contributions from the project for community benefit was queried.</p>	<p>SSEN Transmission are a regulated business and are not permitted to pay community benefit due to project costs being met by electricity customers across Great Britain. All project costs have to be approved in advance by Ofgem, the electricity industry regulator. However, SSEN Transmission may require to carry out some improvements to local infrastructure as part of the project delivery.</p> <p>There are indirect, but tangible, benefits which arise during the construction of these projects and SSEN Transmission often seek opportunities to leave a legacy. It is likely that construction workers will stay in local hotels & B&Bs. School visits or volunteer days in the local area may be possible during this period.</p>
<p>Queries were raised in relation to the virtual exhibition itself: how does SSEN Transmission ensure everyone has access to the same information as per an in-person exhibition, and have there been any complaints raised in regard to hosting the exhibition virtually?</p>	<p>The virtual consultation events have been designed to be as interactive as face-to-face events, allowing presentation of key project information and plans, as well as providing opportunities to ask questions about the project. Visitors are able to engage directly with the project team, via an instant message chat function, where they can ask any questions they might have about the project and share feedback on the current proposals. All material that would have been presented at an in-person consultation is available via the online virtual platform.</p> <p>SSEN Transmission wrote to 822 properties within the vicinity of the Melgarve Cluster proposals to advise that unfortunately the planned in-person public consultations needed to be moved to our online platform due to the increasing levels of COVID-19 across the country. SSEN Transmission also contacted the local community councils and locally elected members. No complaints have been received following this necessary move to help keep the public safe and reduce any risk of infections. Laggan community council advised they found the move understandable.</p>
<p>The reason for holding a virtual consultation rather than postponing to a later date to allow for an in-person exhibition was queried.</p>	<p>Unfortunately, as COVID-19 continues to be an evolving situation and infection rates continue to increase across the country, SSEN Transmission felt it would not be possible determine a date in the near future where a potentially large gathering could be held. Therefore, SSEN Transmission took the decision to utilise the virtual consultation</p>



Feedback Comments	Response by SSEN Transmission
	platform instead of delaying to an unknown time and potentially delaying the programme. Once COVID restrictions lift there are plans for future consultations to be both face-to-face and virtual. This is so that anyone that is unable to travel to a face-to-face event has the option of accessing the event virtually. SSEN Transmission welcome any comments on how to improve the virtual platform for the future.
It was noted that online documents were confusing as the construction dates conflict with what is presented at the exhibition.	Apologies for the confusion, the Dell project energises in Spring 2026, some of the completion or "snagging" works may extend into Summer 2026.
The date of the next consultation was requested.	It is likely to be in late Spring 2022.



7. PROJECT RESPONSES TO CONSULTATIONS

7.1 Overview

7.1.1 This part of the Report summarises how the project has responded to the consultation responses arising from the preferred routes for each connection as set out within the Melgarve Cluster Consultation Document. This part of the Report also summarises how the project has responded to the consultation responses arising from the information provided for the extension of Melgarve substation. Responses to each of the points raised by stakeholders through the consultation process are included in Sections 5 and 6 above.

7.2 Summary of Key Consultation Responses for Grid Connections

- 7.2.1 The consultation process for the grid connections associated with the project thus far largely related to the design evolution of the connections. It was outlined that the development proposals must demonstrate sensitivity and respect towards the local distinctiveness of the landscape. The natural heritage of the area was raised as a key issue, in particular the River Spey SAC, which is protected for salmon, freshwater pearl mussel, sea lamprey and otter.
- 7.2.2 The need for supporting landscape and visual assessment material such as ZTVs or visualisations was outlined and advice was given on the SLQs of the Cairngorms National Park and on WLA 19 - Braeroy - Glenshirra - Creag Meagaidh and WLA 20 – Monadhliath. It was recommended that the choice of route and connection type should be informed by further landscape and visual assessment.
- 7.2.3 In relation to habitats, it was stated that the route selection process should be informed by surveys and assessments and that appropriate assessments should be undertaken to ensure suitable mitigation is provided to avoid disturbance impacts. Attention was also given to likely presence of Annex 1 habitat types including blanket bog and alpine heath.
- 7.2.4 In relation to ornithology, it was recommended that potential impacts to wider countryside birds were assessed against the relevant Natural Heritage Zone (NHZ) population. Attention was brought to the potential for the connection proposals to impact on the NHZ golden eagle population, both on their own and in combination with the other developments in the area. It was recommended that available information from surveys and assessments for other proposals in this area, is used to inform the route selection process so that it minimises potential impacts to golden eagles.
- 7.2.5 Advice also focussed on transport and access. It was noted that a TA should accompany the applications and that it should include a Framework Construction Traffic Management Plan (CTMP) aimed at minimising the impact of the construction-related traffic on all other users of the local public roads, including any measures deemed necessary to protect the safety of cyclists and pedestrians.
- 7.2.6 The community consultation responses from the virtual public exhibition events raised a number of comments querying the rationale behind the use of OHL rather than UGC for the Dell and Cloiche connections due to Glenshero and Stronelairst wind farms opting for an UGC connection. The comments would suggest a need to revisit the rationale regarding OHL rather than UGC or, if this is not practicable, rationalise the connections as far as possible. Also raised by consultees was the need to consider the use of single circuit lattice towers against the use of double circuit lattice towers in more detail.
- 7.2.7 Concern for the potential for adverse effects on the operation of existing and proposed wind farms in the areas and interference with users of the access tracks was also raised in consultee comments. The main points raised related to the connection for Cloiche and Dell both passing through or adjacent to Stronelairst Wind Farm and access roads. In contrast, comments raised by statutory consultees requested that existing infrastructure and already disturbed ground be utilised as far as possible to minimise disruption to as-yet undisturbed areas.



- 7.2.8 Concerns were raised in relation to potential disruption of the community and tourism in the area as a result of the project. This related to the local community's sensitivity to transport disruption. Consultees encouraged SSEN Transmission to provide a Design and Access Statement addressing these concerns. An appropriate Transport Assessment was also requested, which should detail any and all abnormal loads requiring to be transported and how existing structures along the route(s) would be affected.
- 7.2.9 Potential impacts on sporting activities within the Stronelairg estate (namely shooting) were mentioned, as well as potential impacts on long distance walking routes. The potential for adverse effects on the scenic qualities of the area by new OHLs was raised, in particular on the Special Landscape Qualities (SLQs) of the Cairngorms National Park and on Wild Land Area (WLA) 19 - Braeroy - Glenshirra - Creag Meagaidh and WLA 20 – Monadhliath. Comments from consultees also related to protected species, given the rural nature of the area, in close proximity to native woodland and watercourses which is likely to be home to or foraging ground for several protected species.
- 7.2.10 Potential adverse effects on designated natural heritage sites, sensitive habitats, including peat soils, and sensitive bird species, including Golden Eagle, were raised. A particular request was made for a dedicated collision risk assessment for Slavonian grebe as part of assessments. Concerns were raised in relation to woodland impacts, requesting that a woodland survey and subsequent Arboricultural Impact Assessment be carried out. A number of comments were also raised in relation to flooding and drainage, with an emphasis on designing the developments to accommodate a 1 in 200 year storm event; a Drainage Impact Assessment was requested to address these concerns.
- 7.2.11 Several requests for additional direct consultation on various elements of the development design were made during consultation, including with SSE Glendoe to discuss Glendoe Hydro Scheme assets, with SSE Renewables for Cloiche Wind Farm, and further consultation with the public and local community councils.

7.3 Summary of Key Consultation Responses for Melgarve Substation

- 7.3.1 The consultation process for Melgarve substation has thus far largely related to the design evolution of the substation extension. Similarly, to the feedback for the grid connection proposals, it was outlined that the development proposals must demonstrate sensitivity and respect towards the local distinctiveness of the landscape. The natural heritage of the area was raised as a key issue, in particular the River Spey SAC. It was also outlined that an AIA would be required. It was noted that the substation extension would require a Design and Access Statement in accordance with The Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009 and The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008.
- 7.3.2 Areas of peat were also identified as a point of interest. Advice suggested that the final layout plan should avoid the areas of deepest peat, keep the footprint of the development as small as possible and use construction methods, such as floating or piling to reduce impact on peat as much as possible.
- 7.3.3 Advice on transport and access noted that the TA should include a CTMP aimed at minimising the impact of the construction-related traffic on all other users of the local public roads in that area, including any measures deemed necessary to protect the safety of cyclists and pedestrians
- 7.3.4 The community consultation responses from the virtual public exhibition events raised queries over the current and future size and capacity of Melgarve substation, along with its potential visibility following completion of works. Further information was also requested on the extension of the substation, such as the size of ground footprint, electrical infrastructure required, and landscaping works proposed.
- 7.3.5 The requested information has been supplied above in **Table 6.1**.



7.4 Project Responses

7.4.1 To address these points, the following actions are being undertaken in relation to all aspects of the project:

- The reasons for use of OHL rather than UGC are set out in responses throughout **Table 5.1** and **Table 6.1**; however, the design of the proposals is still progressing at this stage and alternative options, including use of UGC connections, may be explored further as the project design progresses. Rationalisation of the two OHL connections remains a key element of the design development under review, and opportunities to consolidate connections to minimise development footprint are being explored alongside further technical and environmental studies.
- OHL towers will be designed and positioned so as not to interfere with the operation or output of any wind farm or the Glendoe Hydro Scheme. SSEN Transmission will discuss the development design further with the appropriate consultees and stakeholders to arrive at a design solution which suits and accommodates all parties while making best use of existing infrastructure and already disturbed ground.
- Transport assessments and Construction Traffic Management Plans will be implemented during the construction period to limit the impact on residents and road users. SSEN Transmission will set up a Community Liaison Group prior to construction starting in order to keep the local community and businesses up to date with construction activities regularly during the construction period. SSEN Transmission will also look to coordinate with wind farm developers to ensure impacts are managed. Care will be taken to ensure that existing paths and rights of way are not blocked and that disruption to recreational and / or tourism interests are minimised.
- Full LVIA's will be carried out as part of the EIA/EA for each development and supporting information, including ZTV figures and visualisations, included with the EIA/EA Reports. Landscape and visual impacts will be considered further as part of the alignment selection stage, which will seek to select alignments with minimal potential impacts on the landscape and visual receptors in the vicinity, on balance with other environmental considerations. The potential impacts of the development on the nearby WLAs will be considered either within a dedicated Wild Land Assessment or as part of the LVIA for each development.
- Assessments will be undertaken as part of the EIA/EA process to determine potential impacts on designated natural heritage sites and their qualifying interests, woodland areas, sensitive terrestrial and bird species and sensitive habitats, including peat soils and heathland, and ensure suitable mitigation is provided to avoid any significant impacts arising.
- A Design and Access Statement will be included in submission for the substation extension and considered for inclusion in submission for the connections.
- The developments are being designed with flooding and drainage in mind, as well as potential impacts upon the Glendoe Reservoir catchment. A Drainage Impact Assessment will be prepared to assess these impacts and ensure the developments do not result in any significant impacts on the water environment or adversely affect the catchment area.
- Further consultation will be organised with key statutory and non-statutory consultees, local councillors and local communities to provide updates on the project during subsequent project stages. Formal consultation will next be organised on completion of the alignment studies to enable comments to be sought on the preferred alignment identified; however, additional consultation will be carried out with a number of stakeholders who have requested further input, including the owners and operators of Glendoe Hydro Scheme and Stronelairg Wind Farm and the Laggan Community Council.

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



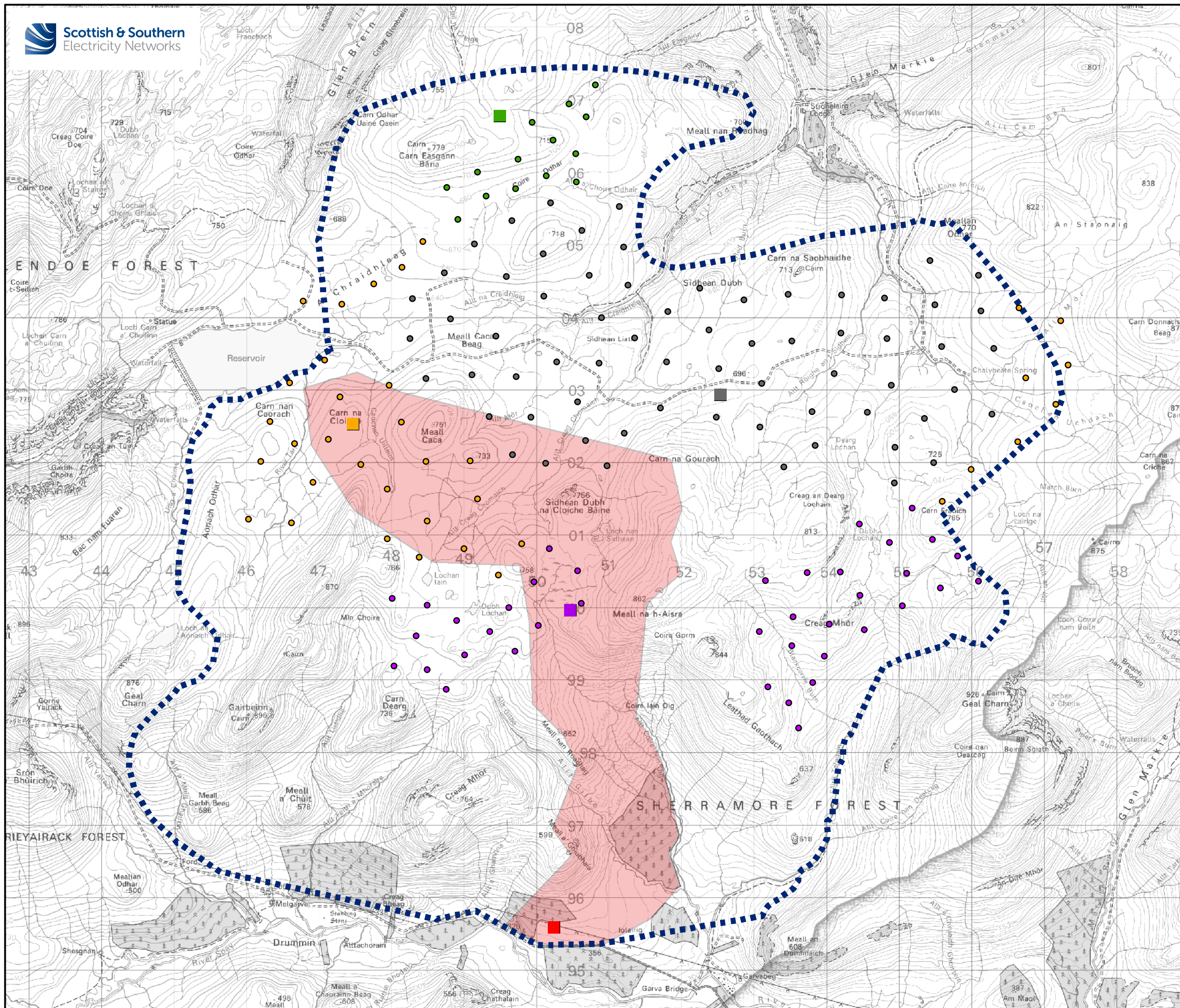
8. CONCLUSIONS AND NEXT STEPS

8.1 Conclusion

- 8.1.1 The proposed Melgarve Cluster Project requires three wind farms to be connected to the electricity transmission network at Melgarve substation. It is anticipated that this will be achieved via the construction and operation of new 132 kV single circuit connections to Melgarve substation. The preferred engineering solution for the Dell and Cloiche connections are for an overhead line (OHL) and the Glenshero is proposed as an underground cable (UGC), which is the wind farm developer's choice.
- 8.1.2 This Report on Consultation documents the consultation process which has been undertaken for the project between November 2021 and February 2022. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the preferred route options.
- 8.1.3 This report has described the key responses received and provides detail on the actions proposed in response to the issues raised. The consultation process has largely confirmed that for the Cloiche connection and the Dell connection, Route Option C3 and Route Option D1 remain the preferred route options, respectively. It is noted, however, that a number of comments were raised in relation to use of OHL rather than UGC for the Cloiche and Dell connections, requesting that the rationale be revisited. The use of OHL for the Cloiche and Dell connections is SSEN Transmission's contracted position with the wind farm developers; however, it is acknowledged that further detailed environmental and engineering work will be undertaken to find acceptable OHL alignments and design solutions, which could result in a review of the preferred route options and or use of appropriate localised mitigation methods, such as UGC sections. The lattice tower design process and opportunities for rationalisation of the Cloiche and Dell connections are also ongoing and are key factors in how these route options are be viewed by consultees.
- 8.1.4 For the Glenshero connection, Route Option G1 remains the Preferred Route, and its use of UGC is seen favourably by consultees.
- 8.1.5 The preferred route options are displayed on **Figure 1**.
- 8.1.6 These preferred routes were selected on the basis that they are considered to provide an optimum balance of environmental, technical and economic factors.

8.2 Next Steps

- 8.2.1 The project will now be taken into Stage 3 (Alignment Selection), commencing with identification of alignment options within the Preferred Route for each connection. These will be informed by this and further consultation exercises, and through detailed surveys, which may identify any additional and / or currently unknown engineering, environmental or land use constraints.
- 8.2.2 Further direct consultation will be undertaken with SSE Renewables for Glendoe Hydro Scheme and Stronelairg Wind Farm Ltd prior to further formal consultation at the end of Stage 3. A further consultation meeting was undertaken with Laggan Community Council on 21st February. An update was provided on the OHL design and commitment was given to keeping Laggan Community Council up to date on the alignment consultations intended to be held in Spring and if the projects progress into delivery that SSEN Transmission would continue to attend community council meetings or set up a dedicated community liaison group.

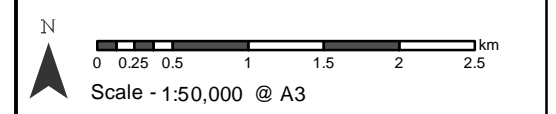


Legend

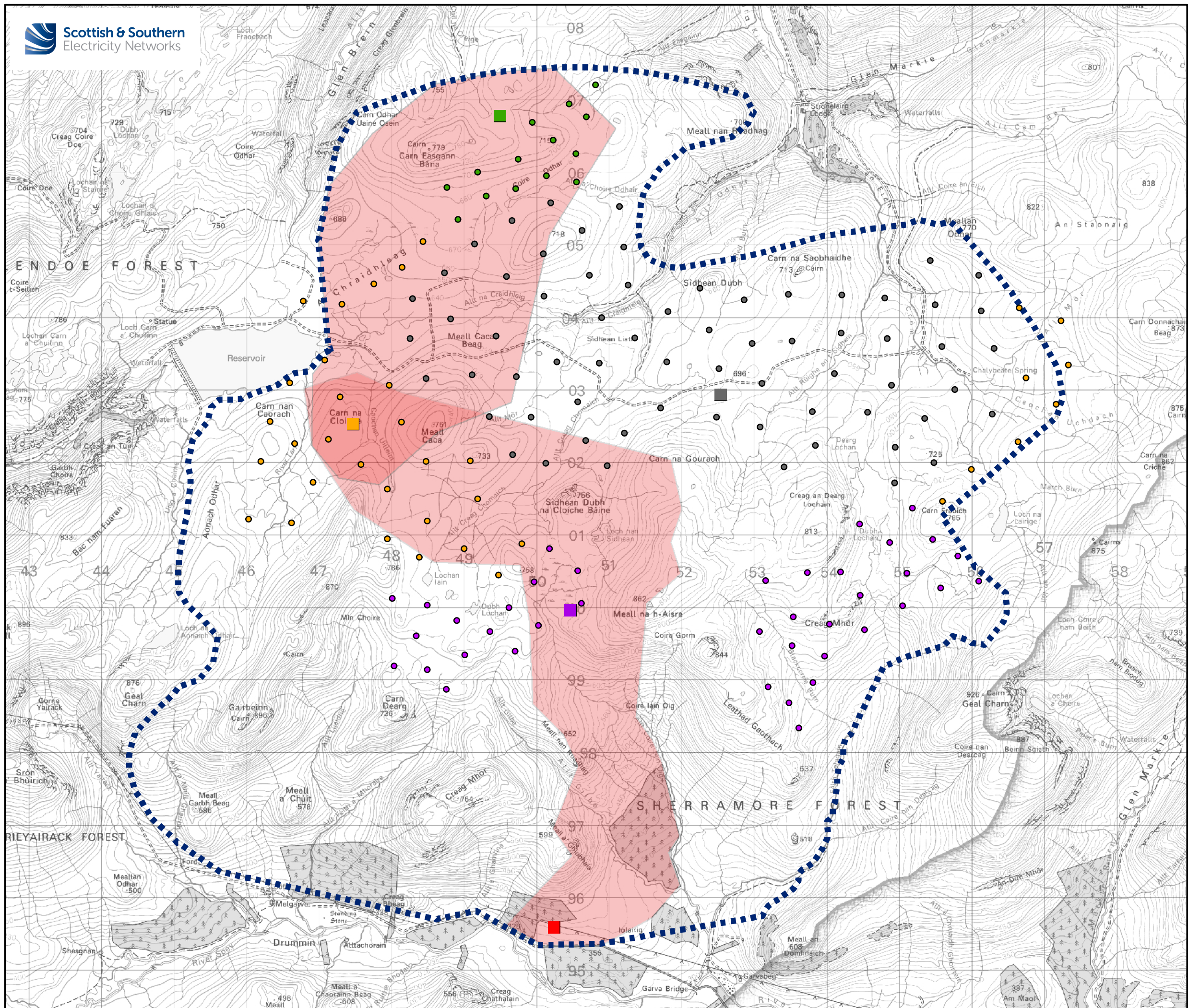
- Study Corridor
- Cloiche Preferred Route Option C3
- Cloiche Application Turbine
- Dell Consented Turbine
- Glenshero Application Turbine
- Stronelairg Turbine







Substations





- Melgarve
- Cloiche
- Dell
- Glenshero
- Stronelairg

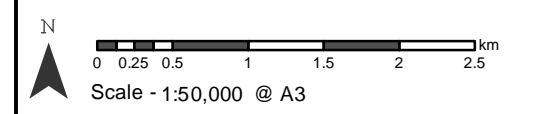


Project:	Melgarve Cluster
Title:	Figure 1 - Melgarve Corridor Preferred Route Page 1 of 2
Drawn by:	LV
Date:	11/05/2022
Drawing:	121010-D-ROCD1-1.0.0



- Legend**
-  Study Corridor
 -  Dell Preferred Route Option D1 + C3
 -  Cloiche Application Turbine
 -  Dell Consented Turbine
 -  Glenshero Application Turbine
 -  Stronelairg Turbine

- Substations**
-  Melgarve
 -  Cloiche
 -  Dell
 -  Glenshero
 -  Stronelairg



Project:	Melgarve Cluster
Title:	Figure 1 - Melgarve Corridor Preferred Route Page 2 of 2
Drawn by:	LV
Date:	11/05/2022
Drawing:	121010-D-ROCD1-1.0.0