

ANNEX F: SUMMARY OF ROUTE STAGE CONSULTATION FEEDBACK FROM STATUTORY & NON-STATUTORY CONSULTEES – MAY 2022



Statutory and Non-Statutory Consultee Feedback on Melgarve Cluster Route Options - May 2022

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	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



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	connected to it. Any future proposal would require a high standard of pollution 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. NatureScot recommends that an otter survey is undertaken in suitable areas of habitat within 200m of the proposals, in accordance with our guidance. NatureScot also recommends further consideration of freshwater pearl mussels in line with their guidance.	impacts on Otters and Freshwater Pearl Mussel will be considered as part of ecology assessments as the project develops.
	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.	A Habitat Regulations Appraisal will be carried out for the River Spey.
	The Conservation Advice Package for the River Spey SAC has recently been published and will provide useful background information. It is available on SiteLink.	Noted. The Conservation Advice Package will be reviewed as part of environmental assessments.
	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.	Data will be requested from RSPB and collision risk assessment for breeding Slavonian grebe carried out at EIA/EA stage.
	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.	Noted. In the event that dotterel are recorded the need for HRA will be reviewed.
	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.	Noted. Potential impacts on the noted designated natural heritage sites will be assessed as part of EIA/EA.
	The Glendoe Lochans SSSI underpins the Loch Knockie and nearby Lochs SPA and is protected for breeding common scoter and Slavonian grebe. For common	Potential impacts on common scoter will be assessed using new ornithology survey data from current surveys and supported by desk based information.



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	scoter, we recommend an assessment of potential impacts through survey and desk study assessment.	
	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.	Noted. Potential impacts on the noted designated natural heritage site will be assessed as part of EIA/EA.
	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.	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.
	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.	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.
	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.	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.
	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	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



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	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 be pleased to offer more detailed comment on the scope of assessment once further supporting information is available.	EIA/EA stage. Further consultation will be sought with NatureScot following appraisal of alignment options.
	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.	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.
	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.	The potential to rationalise grid infrastructure will be given further consideration as the project progresses against other environmental, engineering and project factors.
	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.	Potential impacts of the development on the CNP will be fully assesses as part of LVIAs at EIA/EA stage, including reference to its Special Landscape Qualities.
	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.	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.
	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	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.



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	landslide hazard and risk assessments: best practice guide for proposed electricity generation developments".	
	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.	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.
	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.	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.
	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.	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.



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	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".	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. NatureScot's guidance "Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds" will be consulted as the proposal progresses.
	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.	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. 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.
	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.	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.
	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.	The existing background information available from other developments nearby will be reviewed as part of desk studies.
	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 route it is likely that you will have to demonstrate that this has not affected your	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.

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	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.	
	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.	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.
	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.	Additional desk studies will be undertaken to account for the difficulties in detecting Slavonian grebe and common scoter during field surveys.
	For breeding raptors generally we note that targeted walkovers are proposed once breeding in a site is suspected following previous survey results or correspondence	Methods for breeding raptor surveys will follow the noted guidance.



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	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.	
	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.	Methods for diver surveys will follow the noted guidance.
	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.	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.
	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.	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.
	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.	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.
Scottish Environment Protection Agency (SEPA)	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 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.	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.



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	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.	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.
	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.	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.
	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.	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.
	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.	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.
	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	Noted. Areas of Class 1 and 2 peat soils were identified during route appraisals and mapped to inform route selection.



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	maps also suggest significant areas of blanket bog within the route corridor. Some of these areas are at high altitude and therefore particularly sensitive.	
	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.	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.
	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.	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.
	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.	The EIA reports will include details of the development's ability to weather 1 in 200 year storm events.
	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.	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.
	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 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 undertaken with the assessment will be included within the EIA/EA Report.



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	Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include: a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater 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. 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.	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.
The Highland Council (THC)	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.	Noted. Further information in relation to alignments, number of towers and cumulative corridor widths will be provided as the design of the developments progress.
	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.	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.
	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 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:	The direct and indirect impacts of the development on the noted sites will be fully explored within the EIA/EA report for each connection, as appropriate. Assessments will be carried out in line with current guidance and best practice.



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	 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. 	
	Given that the existing Stronelairg 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 Stronelairg 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.	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.
	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	The opportunity to rationalise the projects will be explored as part of the Alignment Options process. 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



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	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.	information from nearby projects will be utilised as far as is practicable.
	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.	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.
	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.	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.
	You are advised that the following consent(s) will be required for the proposed development: • Section 37 Consent • Controlled Activities Regulations (CAR) Licence	Noted. Applications for Section 37 consent will be supported by environmental reports. CAR licences will be sought separately.
	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	It is noted that the development will be assessed against the applicable policies of the HwLDP). A Planning Statement will be produced to accompany the s37 application that will consider all applicable planning policy.

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	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	
	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.
	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)	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.

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Stakeholder	Summary of Feedback	Response by SSEN Transmission
	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)	
	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).	Noted.
	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 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.	Noted.
	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.	Noted.

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	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 WHILDP 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.	The IMFLDP and WHILDP will be reviewed as part of organisation of community engagement events.
	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.	Noted.
	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. 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.	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. 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.
	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	Noted.

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	policy, subject to balancing and mitigating any detrimental impacts the scheme might create, this includes areas of natural, built and cultural heritage features.	
	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.	Noted.
	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.	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.
	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: • 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; 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.	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.



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	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.	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.
	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.	Noted.
	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. 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.	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.
	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 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	Full LVIAs 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 locations will be re-used, where practicable to do so, and all locations will be agreed with THC as part of further consultation.

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	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.	
	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.	Noted.
	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.'	Noted.
	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.'	Noted.
	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 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.	Noted.



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	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.	Noted.
	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.	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.
	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.	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.
	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.	The EIA/EA Reports will include information on how the developments overcome any significant effects on the noted soils and habitats.
	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.



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	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 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 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.	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.
	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	A TA that sets out the public roads that may be impacted by the proposed works, with justifications for the suitability of those



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	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.	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.
	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.	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.
	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.	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.
	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.	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.
	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.	A detailed scoping exercise will be carried out in consultation with the Council's Transport Planning Team and Transport Scotland.



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	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.	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.
	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: • 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 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.	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.



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	driving through all villages and settlements, with cognisance of relevant speed restrictions and local conditions/limitations of the road network.	
	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. 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.	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.
	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.	The TA will include plans detailing surfacing, drainage and visibility splays with relevant dimensions included, in line with THC's noted guidance.
	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.	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.
	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).	The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.



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Stakeholder	Summary of Feedback	Response by SSEN Transmission
	TA Methodology - 2 Set out the existing nature and condition of these public roads. This should include: • 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. This work should be undertaken by a suitably capable and qualified consulting engineer acceptable to The Council. 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. • 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.	The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.
	TA Methodology - 3 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: • The quantum of new traffic impacting on these roads throughout the construction, operation and decommissioning periods of this development. This should cover: 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 TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	 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. 	
	TA Methodology - 4 Set out the proposed mitigation measures needed to tackle the anticipated impacts set out above. This should include: • 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. 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.	The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.
	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.	The TA submitted with EIA/EA reporting for the Proposed Development will adhere to the noted methodology.
	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.	The TA accompanying the EIA/EA reports will follow the above points as a guide and include any further pertinent information beyond these.



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	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.	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.
	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.	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.
	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.	Noted. More up to date and complete information from Scotways will be reviewed once received.
	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 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.	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.
	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	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.

Systems (SuDS) principles. The applicant should demonstrate, within the proposals



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Stakeholder	Summary of Feedback	Response by SSEN Transmission
	submitted, any mitigation measures to manage the residual risk of overland flow/pluvial flooding.	
	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.	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.
	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.
	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.	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.
	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 required to contribute towards Transport, Green Infrastructure, Water & Waste and Public Art.	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.



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	The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 require that for any major or national development, preapplication 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.	A PAN will be issued no less than 12 weeks prior to applications for consent. This will be accompanied by a PAC Report.
	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.	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.
	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.	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.
	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.	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.

EIA Screening requests will be made for the overhead line

connections to determine the need for full EIA. These will be

In accordance with Part 2, Regulation 8 of the Electricity Works (Environmental

Opinion should be made in writing to Scottish Ministers' Energy Consents Unit

Impact Assessment) (Scotland) Regulations 2017, a formal request for a Screening



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Stakeholder	Summary of Feedback	Response by SSEN Transmission
	(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.	made well in advance of the applications, taking into account the ECU's current delays to issuing of opinions.
	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.	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.
	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.	Public access requirements will be covered off by way of the Access Management Plan as noted above. 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 would suggest that SSEN Transmission reconsider the preferred engineering solution of an OHL for Cloiche and Dell. An alternative UGC	SSEN Transmission has been contracted by the developers of Cloiche and Dell wind farms to provide OHL connections;



Stakeholder	Summary of Feedback	Response by SSEN Transmission
Connell Renewables Ltd	solution would overcome technical concerns pertaining to OHL construction and long-term maintenance in extreme weather conditions in the area.	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 Stronelairg 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 Stronelairg 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 Stronelairg 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.
	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.



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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 electricity generation. These will have financial implications that should not be overlooked.	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 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.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	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 operational teams are aware of the activity, which is likely to be the case with this activity when work begins.	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.
	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.



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Stakeholder	Summary of Feedback	Response by SSEN Transmission
	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 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.	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. Plans produced as part of the alignment options stage will display the Glendoe Hydro Scheme assets.
	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.	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.



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Stakeholder	Summary of Feedback	Response by SSEN Transmission
	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.	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.
	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.	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.
	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.	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.
	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.	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).



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Stakeholder	Summary of Feedback	Response by SSEN Transmission
	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.	In the event of an environmental incident occurring, SSEN Transmission will make the Glendoe team aware as soon as possible.
	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.	It is not anticipated that there would be any requirement to pump water from the Glendoe reservoir catchment for the proposals.
SSE Renewables for Cloiche Wind Farm	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.	Noted.
	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.	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.
	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.	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.
	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.	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.
	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	Noted.



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Stakeholder	Summary of Feedback	Response by SSEN Transmission
	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).	
	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.	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.
	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.	The point is noted. Engineering feasibility studies will include consideration of opportunities and risks for single vs double circuit comparisons.
	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



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		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) Stronelairg 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 Stronelairg and Glenshero.	The community preference for UGC connections is noted. SSEN Transmission are contracted to develop the connection types stipulated by the Cloice 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.
Stronelairg Wind Farm Ltd	Stronelairg 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 Stronelairg Wind Farm.
	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.	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.
	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.	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.
	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	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



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	advise us of the current maximum distance from SWFL's turbines they are working to?	happy to discuss the development design further with Stronelairg Wind Farm Ltd.
	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.	SSEN Transmission would be happy to discuss the development design further with Stronelairg Wind Farm Ltd.
	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.	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.
	Section 4.5.5 also states that the preferred route D1 would pass over Stronelairg's access tracks. We have concerns about the disruption this may cause to our ability to access and operate Stronelairg. 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.	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.
	Given the importance of Stronelairg to national electricity generation, we ask that the Project does not disrupt Stronelairg'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.	The connections will be designed so as to avoid disrupting Stronelairg 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.
Transport Scotland	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	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.



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	any detrimental effect on structures within the trunk road route path. 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.	