Scottish & Southern Electricity Networks

TRANSMISSION

Creag Dhubh to Dalmally 275kV Connection

Environmental Impact Assessment

Volume 4 | Appendix 4.3

Consultation Register

April 2022

Scottish & Southern Electricity Networks

TRANSMISSION

TECHNICAL APPENDIX 4.3

Consultation and engagement with stakeholders are an important part of the EIA process, with advice and input from key consultees being sought at the early design stages of a project, to inform decisions about the Proposed Development.

An EIA Scoping Report was issued to ECU on 16th December 2020 (see **TA 4.1: EIA Scoping Report(EIAR Volume 4**). A Scoping Opinion was provided by ECU on 8th March 2022, and is included in **TA4.2: EIA Scoping Opinion (EIAR Volume 4**). The responses, contained within the Scoping Opinion and pre-consultation, have been considered in detail during the EIA process.

This Technical Appendix provides details (**Table 4.3.1**) of all consultation feedback received between 2017 and 2022, as well as the Applicant's response and details of how the comments have been addressed throughout the EIA process.

Table 4.3.1:Consultation Register

Consultee	Consultation Type	Date Received	EIAR Reference	Environmental Information Requested	Comments
Pre-Application Responses 207/2018					
Scottish Natural Heritage (now NatureScot)	Pre-Application Consultation	31/08/2017	Chapter 8: Landscape and Visual Impact Assessment	Further to our meeting at SG and our recent subsequent telephone discussion, I am just writing to confirm that SNH advise that the section of overhead power line, from the proposed new substation, sky-lined and running along the north eastern edge of Loch Awe, before going inland to Dalmally, is likely to cause significant landscape challenges considering the importance of this area of Loch Awe and its environs in landscape terms. The national importance of this landscape resource is recognised in our existing objection to Upper Sonachan WF. At the meeting there was some emphasis put on how a very small section of the proposed line was to run on the eastern side of a small hill to provide some screening, however this will not mitigate for the overall impact on the northern end of the loch. I appreciate the formal scoping is still to be issued etc. but I would recommend that all underground options for this section, which would mitigate the landscapes impacts, are considered as early on in the process as possible.	**Chapter 3: Consideration of Alternatives (EIAR Volume 2**) provides details on the design evolution and how landscape concerns have been addressed.
Scottish Natural Heritage (now NatureScot)	Pre-Application Consultation	31/08/2017	Chapter 8: Landscape and Visual Impact Assessment	The northern part of Loch Awe holds a landscape resource which is considered to be of national interest as described in our formal response to the Section 36 Application for Upper Sonachan Wind Farm (see attached). The Creag Dhubh substation to Dalmally substation 75kV overhead line has the potential to impact on this resource by sky lining transmission lines and towers, encircling the top end of the loch and leading the eye to associated wind farm developments. The substation and line will also have potential for cumulative impact with WFS. Part of the route will pass through or be close to the Glen Etive and Glen Fyne SPA for golden eagles. To minimise these impacts we suggest the following design principles are followed: • the substation be situated on the southern side of the slopes i.e. of Craig nan Sassanach, or another location, so as not to be visible in conjunction with Loch Awe. Any resulting views when travelling north on A819 will be a snapshots in comparison and, due to elevation, can be effectively screened with trees. • undergrounding of the cable from the sub-station on the east side of Loch Awe through to Dalmally and the Creag Dhubh substation. For your info there are proposals for a cycle/footpath from Tyndrum to Oban (part of a recognised National Walking and Cycling Network in NPF 3). If it is possible to establish a recreational surface along the top of the underground cabling this could add a significant legacy to this project for the community and tourism infra-structure of Argyll. A path from the substation through to Dalmally could create, in conjunction with the old military track to Duncan McIntyre's monument, a circular spur to the main route. A path over the cabling associated with crossing the River Orchy at the NE end of Loch Awe, would be a tremendous asset as that is currently a pinch point for the route negotiating not only crossing the river, but also finding a route which is separate from the railway track and A82 trunk road.	The overhead line alignment selection assessment and substation environmental assessments have identified the northern part of Loch Awe as a landscape of regional importance. There are no landscape designations of national importance (National Parks or National Scenic Areas) within the area from which there would be visibility of the Proposed Development[1]. The Ben Nevis and Glen Coe NSA lies at the northern edge of a 10km buffer from the Indicative Proposed Alignment, but intervening topography (e.g. Ben Eunaich and Ben a Chochuill) would screen all views. The North Argyll Area of Panoramic Quality (APQ), the regional landscape designation defined in the Local Development Plan covers a large area from Kilchrenan in the east to Glen Lochy in the west and Glen Kinglas in the north to Glen Orchy and Glen Lochy in the west. The Indicative Proposed Alignment falls entirely within the APQ. The Creag Dhubh substation is proposed to be located on the south-western slope of Craig nan Sassanach. Undergrounding is being considered from the Dalmally substation to 1 km south of the A85, see Section 5 below for further details.
Argyll and Bute Council	Pre-Application Consultation	27/04/2018	All	As a general comment the Council considers that subject to providing further information on the detail of the design and routing of the proposals to maximise landscape assimilation and minimise skylining, that it may be possible to promote an acceptable route/design solution for this section of the OHL given the constrained visibility from the A85 and settlements on the southern bank of Loch Awe. As the towers are static and of a bare metal finish which darkens into the landscape, there is less potential for significant landscape impact. As a general comment the Council considers that static towers are unlikely to have the same potential significance of landscape impact as large scale wind turbines. In respect of the section of the preferred route nearest Cladich, it is considered that keeping the tower alignment within the existing commercial forest envelope should be considered unless this would result in skylining or other environmental consequences. Further discussion on this and the more detail route options would be welcomed in consultation with SNH.	Further details including a ZTV will be included in the EIA Scoping Report. An LVIA will be completed in the EIA Report in accordance with best practice including the Guidelines for Landscape and Visual Impact Assessment (3rd edition) (GLVIA3). Potential landscape effects include those on: • The fabric of the landscape. • Direct & indirect effects on the North Loch Awe Craggy Upland and the Mountain Glens LCTs, and indirect effects on the Rock Mosaic and High Tops LCTs.

				More detailed consideration in respect of the variations in routing between Points 4 and 7 and Point 3 and the proposed Creag Dhubh Substation will be required in liaison with SNH as different variations have different landscape and wildlife consequences. However, even within these variations of detailed route it is considered that an acceptable solution which does not have significant landscape or amenity impact is considered likely to be possible. However, in the event that the Upper Sonachan Wind Farm is approved by the Scottish Ministers there will be a need to consider potential cumulative landscape impacts of any proposed substation and transmission line and its detailed relationship to the windfarm and associated infrastructure. Should Upper Sonachan Wind Farm ultimately be approved a more sensitive landscape framework will exist in respect of potential cumulative landscape impact. The proposed Creag Dhubh Substation is currently subject to a screening request in respect of a future planning application (REF: 18/00702/SCREEN). Officers are aware from the Upper Sonachan Wind Farm Inquiry held in November 2017 that a forestry management plan for the commercial forestry around the proposed substation site exists which will be material to the visibility of the proposed substation, whether it is required to be considered in either a cumulative context with Upper Sonachan Wind Farm, or as a separate and individual element contextualised within the landscape framework only by the transmission line infrastructure. The Dalmally Substation to A85 crossing represents the section of the proposed route where greatest concern over unacceptable and potentially significant landscape and amenity impacts exist on the basis of the information provided to date. In addition to concerns over potentially significant landscape impacts, the Council is also extremely concerned at the potential impact on the amenity of a number of residential properties located on the West of the B8077 at Stronmilchan. It is considered that the scale of the proposals, and the potential proximity of the route/ towers to residential properties raises the possibility of over dominant and overbearing structures being proposed. As the exact route and location of the towers is not yet clear the normal variation in routing within the identified corridor could result in potentially very significant impact on the level of amenity enjoyed currently by these residential properties. The potential proximity, scale and impact on residential occupiers is considered to be potentially significant and unacceptable unless further mitigation on this section of the preferred route is proposed. The Council therefore considers that this section of the proposed route should be by underground cable to the maximum extent physically possible. This is in accordance with general observations of SNH, albeit that as well as landscape impacts/effects the Council also has serious concerns over the potential impact upon the amenity of local residents in Stronmilchan.	• The North Argyll APQ • Ben Lui and Loch Etive Mountains WLAs • Potential visual effects include those on: – Residential receptors in the settlements of Dalmally and Stronmilchan and scattered residential properties at Croftintuime, Blarchaorain, Achlian and Bovuy – Recreational receptors accessing the Munro summits in the Ben Cruachan and Beinn Eunaich groups north of Loch Awe, local walkers including those using the paths to the Cruachan Dam, visitors to Kilchurn Castle and St Conan's Kirk and kayakers on Loch Awe – Transport receptors on the A85, A819, B8077 roads and on the Oban railway Noted. The EIA Scoping Report will contain indicative tower positions and the Indicative Proposed Alignment. Noted. An underground cable is not being considered for this section. An underground cable is being considered for Angle Towers 7A to 9 only. If Upper Sonachan Wind Farm is approved before the EIA Scoping Report is issued it will contain details of the proposed cumulative landscape assessment to be included in the EIA Report. The Keppochan East Long Term Forest Plan (LTFP) is being considered and the effect of the Creag Dhubh substation and the 275kV overhead line will be considered in the respective development consent applications through Town and Country Planning (Scotland) Act 1997 and Section 37 of the Electricity Act 1989. A single report describing the felling required for both the substation and the overhead line will be prepared. Details of the potential for effects on Forestry will be provided in the EIA Scoping Report for the 275 kV overhead line. The LVIA completed in the EIA Report

[1] Note – this is a historical response. There is a small section of visibility from LLTNP mentioned in Chapter 8 of the EIAR.

				The importance, and sensitivity to major change of the landscape of the northern head of Loch Awe, and its role as an important gateway feature has been clarified in the SNH response dated 23.3.18 and referenced attachments. SNH consider this landscape compartment to be of national importance (as set out in the SNH submissions to the Upper Sonachan Wind Farm PLI and attached to the SNH consultation response). The open aspect of the head of Loch Awe, its landscape value, and its sensitivity to change has been the subject of substantial commentary and representations in respect of the PLI relating to the Upper Sonachan Wind Farm. Details of these can be found on the Energy Consents Unit Portal in respect of the written submissions of SNH and the Council, and the precognition of Carol Anderson who led evidence jointly on behalf of both SNH and the Council at the PLI. A link to the site is set out below: http://www.energyconsents.scot/ApplicationSearch.aspx. These submissions are considered material to the consideration of the proposed OHL in respect of Section 2 as they represent formal public expressions of the views of both SNH and the Council in respect of landscape character and sensitivity. No material change in circumstances since November 2017 have been identified and the Council therefore maintains its position in respect of the landscape importance and high sensitivity to change of this area as expressed in the PLI documentation. The Council considers that in the absence of undergrounding this section of the favoured route, that further work and consideration be given to utilising Route Option 5 which appears to be a better landscape fit to the surrounding topography avoiding potentially serious landscape impacts at the head of Loch Awe. This would essentially closely follow the route of the existing transmission line to the rear of the properties in Stronmilchan and benefit from backdropping from adjoining hills. However, there will be a requirement to carefully consider the routing of additional new and larger towers in proximity to residential properties in Dalmally under route Option 5 and some variation of this route to minimise impact on residential occupiers would appear to be required. This route option benefits from the more limited views and reduced visibility due to the screening provided along the A85 corridor and River Orchy valley, and avoids the route traversing the more open and sensitive landscape at the head of Loch Awe. As a further general comment it will also be necessary to consider potential landscape impacts when viewed from the railway line on the norther bank of Loch Awe which is at a raised position compared to the A85. The setting of the category A Listed Kilchurn Castle and its juxtaposition to the favoured route will also require to be carefully considered and HES will no doubt provide comment on this matter.	will include commercial forestry and likely changes to forestry. A final feasibility assessment of cable route options will be completed by Quarter 1 2019. The EIA Scoping Report will contain indicative tower positions and the Indicative Proposed Alignment. An LVIA will be completed in the EIA Report in accordance with best practice including the Guidelines for Landscape and Visual Impact Assessment (3rd edition) (GLVIA3). The extent of visibility and the effects of local screening will be assessed as part of the LVIA and a more detailed Residential Visual Amenity Assessment carried out for all properties where the LVIA finds a significant visual effect. Residential visual amenity effects on private views from individual dwellings and groups of dwellings will be addressed in an Appendix to the EIA Report The overhead line alignment selection assessment and substation environmental assessments have assessed the northern part of Loch Awe as a landscape of regional importance. Noted, that if underground cable is not possible that Deviation 2B is preferred on landscape grounds (described in response as Route A5, but description provided is of Deviation 2B). An LVIA will be completed in the EIA Report in accordance with best practice including the Guidelines for Landscape and Visual Impact Assessment (3rd edition) (GLVIA3). This will include residential receptors in the settlements of Dalmally and Stronmilchan and scattered residential properties at Croftintuime, Blarchaorain, Achlian and Bovuy. The extent of visibility and the effects of local screening will be assessed as part of the LVIA and a more detailed Residential Visual Amenity Assessment carried out for all properties where the LVIA finds a significant visual effect. This will include transport receptors on the A85, A819, B8077 roads and on the Oban railway. This will also include recreational receptors accessing the Munro summits in the Ben Cruachan and Beinn Eunaich groups north of Loch Awe, local walkers including those using the paths to the Cruachan Dam,

					visitors to Kilchurn Castle and St Conan's Kirk and kayakers on Loch Awe.
Forestry Commission Scotland	Pre-Application Consultation	21/05/2018	Chapter 11	Both felling operations and compensatory planting must be carried out in accordance with good forestry practice as defined in the UK Forestry Standard (UKFS). The UKFS, supported by a series of guidelines, is the reference standard for sustainable forest management in the UK and provides a basis for regulation and monitoring. The Scottish Government expects all forestry plans and operations in Scotland to comply with the standards. At this early stage we would make the following comments: 1. At 4-3 through woodland will require integration into the woodland landscape as per scoping document attached and FCS would expect to see this considered in the scoping report and subsequent ES. 2. South west from 7a- there is an opportunity here to run the line along the open edge of the woodland which should minimise felling and provide opportunity for a good edge design. A thin strip of commercial woodland should not be left to the east of the line. 3. AT2 to Creag dhubh Substation. Again here woodland landscape design should be an essential consideration within the scoping and subsequent ES. 4. I understand the SSEN are currently considering underground cabling on some sections of the route. Again integration with the woodland landscape would be essential and we would welcome further discussions as the route becomes clearer. Underground cabling may take a different route and associated corridors of felling.	1. The felling associated with the overhead line Operational Corridor and Access Tracks will be included in the EIA Report. Any associated felling outside the Operational Corridor or Access Tracks will be the subject of separate felling licence applications and are outside the scope of the EIA Report. A single report describing the felling required for both the substation and the overhead line will be prepared. Details of the potential for significant effects on Forestry will be provided in the EIA Scoping Report for the 275 kV overhead line. The LVIA completed in the EIA Report will include commercial forestry and likely changes to forestry. 2. Noted. This should be read alongside the response from Argyll and Bute Council which stated: "*In respect of the section of the preferred route nearest Cladich, it is considered that keeping the tower alignment within the existing commercial forest envelope should be considered unless this would result in skylining or other environmental consequences. Further discussion on this and the more detail route options of Fig 3.1 would be welcomed in consultation with SNH.*" SSEN would welcome a meeting with Argyll & Bute Council, FES and SNH to discuss this issue in advance of the EIA Scoping Report. 3. A single report describing the felling required for both the substation and the overhead line will be prepared. Details of the potential for significant effects on Forestry will be provided in the EIA Scoping Report for the 275 kV overhead line. The LVIA completed in the EIA Report will include commercial forestry and likely changes to forestry. 4. A final Engineering feasibility assessment of cable route options will be completed by March 2019. SSEN will request comments on these documents from all stakeholders.
Historic Environment Scotland	Pre-Application Consultation	27/04/2018	Chapter 9: Archaeology and Cultural Heritage	In our previous response we noted the potential for impacts to a number of scheduled monuments in the area surrounding the proposed overhead line route and suggested that further information and visualisations would assist with our assessment of potential impacts on the setting of those assets identified. While we note that the tables in Section 3 of the consultation document do provide some further information relating to potential impacts on the assets identified, no visualisations have been provided. **Deviation 1 – Loch Awe side (AT4-AT7)** Table 3-1 in section 3 of the document evaluates the proposed alignments in the central section of the proposed overhead line. This section of the line includes the area around two scheduled monuments, Tom a'Chaisteal, dun,	Detailed photomontages have not yet been produced, as we have not selected a proposed alignment and associated tower positions. A package of photographs and associated wirelines (using indicative tower positions) was sent to HES on 16th April 2018. This is the full set of visualisations produced. SSEN will create specific visualisations for the scheduled monuments once the Indicative Proposed Alignment is selected and tower positions are known. These visualisations are normally provided with the EIA Report, with agreement on the number and location of the visualisations agreed during the EIA Scoping stage.

				Teatle Water (SM 4209) and Dychlie, deserted crofts (SM 5149) about which we had previously noted the potential for setting impacts at route selection stage. The baseline alignment is in close proximity to the dun and would have resulted in an angle tower being constructed between the monument and Loch Awe. Both deviations 1A and 1B aim to reduce setting impacts on the dun by moving the line to the southeast, which would move it further from the dun and in the opposite line of sight from Loch Awe. Deviation 1A is the preferred alignment and would result in a tower just over 200m southeast of the dun. This would introduce a new modern element into the dun's surroundings, however the views from the dun down to Loch Awe, which would likely have been the most important in relation to its strategic positioning, would not be affected. The tower is sufficiently far from the dun that it would not reduce a sense of the fort's prominence to a significant degree, or an appreciation of its use of the immediately surrounding topography to augment its defences. The proposed tower included in deviation 1A would be around 200m to the northwest of the township at Dychlie. The introduction of the tower would not significantly affect an ability to understand the town's functional relationship with the surrounding uplands, however, it would erode, to some degree, the character of the monument and in particular its sense of abandonment. Having considered the potential impacts of the proposed preferred alignment on the setting of both of the above monuments, based on the information provided so far, it appears that the potential adverse impacts of the proposed overhead line on the setting of these monuments would be unlikely to raise issues of national significance. **Deviation 2 – Strath of Orchy (AT7-AT9)** Table 3-2 evaluates the proposed alignments at the north end of the proposed route around Dalmally. This section of the proposed line includes the area to the north of Kilchurn Castle, Dalmally (SM 90179) which is also a Property in the Care of Scottish Ministers. Kilchurn Castle is a scheduled monument constituting of substantial remains of a late medieval castle built on a rocky promontory at the northeast end of Loch Awe. On the south side of the loch, to the southwest of the castle, are the unscheduled remains of domestic offices for the castle which were abandoned by c. 1680. Two alignment deviations, along with a baseline alignment have been evaluated. We note that deviation 2B while further away from the castle is considered to be more visible than the baseline or deviation 2A, due to being higher in the landscape. The preferred alignment would be to the east of Kilchurn Castle, with the nearest tower some 1.5km to the east and beyond the A85 and rail line. While the tower may be visible from the castle and therefore will have some impact on the setting it will not impact on the important strategic views down Loch Awe from the castle or disrupt the approach to the castle along the promontory on which it sits and it is unlikely to have a significant impact on the setting of the monument. Visualisations, particularly photomontages of the proposed alignments would have been useful to aid our assessment of the potential impacts on this monument in particular. **Deviation 3 – Approach to Creag Dhubh substation (AT1-AT3)** Table 3-3 evaluates the proposed alignments at the southwest end of the proposed route around Cladich. This section of the proposed line includes the area to the south of a scheduled cup-marked rock. The proposed route runs to the south of a cup-marked rock at Keppochan. The nearest tower would be some 650m to the south of the monument. While the tower would be clearly visible at this distance, it would not affect an ability to appreciate the rock's relationship to the surrounding open landscape of glens, mountains and Loch Awe. We consider that it is unlikely that the proposed line will have significant impacts on the setting of the cup-marked stone.	Further detail on potential effects of the project on cultural heritage assets (archaeology and built heritage) will be provided in the EIA Scoping Report. The following scheduled monuments have so far been identified for further assessment in the EIA Report. • Kilchurn Castle (SM90179) • Barr a' Chaistealain dun and township (SM3858) • Tom a' Chaistel dun (SM4209) • Dychlie Deserted Crofts (SM5149) Visualisations for each of the above scheduled monuments will be created for the EIA Report. A photomontage will be produced for Kilchurn Castle. Suitable viewpoint photography locations will be agreed with HES before photomontages are created. Visualisations are located in **Volume 3b** of the **EIAR.** Noted. The potential for significant effects was considered to be unlikely for Keppochan, cup-marked stone (SM 4186). It was not intended to create visualisations from this location; this approach will be described in the EIA Scoping Report and agreement with HES sought for this approach.
Scottish Environment Protection Agency	Pre-Application Consultation	03/04/2018	Chapter 10: Hydrology.	• In order to assess the potential risk to the GWDTEs, a Phase 1 Habitat Survey should be submitted. The guidance 'SNIFFER (2009) WFD95 – A Functional Wetland Typology for Scotland' being used to identify wetland types, both within and outwith the site boundary, within the following distances of development as a minimum (for the purpose of micro-siting a wider expanse may be surveyed): a) within 100m radius of all excavations less than 1m in depth; b) within 250m of all excavations deeper than 1m.	Where GWDTEs are identified within 250m of the tower foundations or excavations, or 100m of temporary access tracks, a technical report will be prepared to accompany the EIA Report to demonstrate how the GWDTE would be protected (i.e. prevention of the development of preferential pathways for groundwater

				• A National Vegetation Classification (NVC) survey may be required as part of a site specific detailed quantitative and/or qualitative risk assessment for proposed infrastructure involving excavation below a depth of 1m within 250m of sensitive receptors. In all other cases, a Phase 1 survey with the identification of wetland types using SNIFFER (2009) will suffice. • We request that the infrastructure (including the proposed locations of all the wooden poles, steel towers and access tracks etc.) are overlain on the habitat maps in order that we can accurately assess any potential impacts of the proposed works on GWDTEs. It would be very helpful if the 100m and 250m buffers could also be applied to the maps if that was possible. The maps provided will need to be of a suitable scale to help achieve an accurate assessment. Peat depth surveys have been mentioned in the Consultation Document. These will be required along with maps showing peat depths and all infrastructure overlain in order to access whether areas of deep peat have been avoided where possible. Details on quantities of peat to be excavated and peat re-use measures will be required along with a Peat Management Plan. We request that areas where deep peat and GWDTEs are present are avoided. If this is not possible and justification has been provided, appropriate mitigation measures should be put in place to protect these habitats such as maintaining the hydrological integrity/pathways to these sensitive receptors. We can provide advice on mitigation measures when we have more details on the location of the proposed infrastructure in relation to the GWTDEs.	and significant drying of GWDTE), in accordance with SEPA Guidance Note 31 (LUPS-GU31). This will be presented as an appendix to the EIA Report. Watercourse Crossing Assessment: A site survey of existing water features will be undertaken and a map of the location of all proposed engineering activities in the water environment provided. A systematic table detailing the justification for the activity; crossing proposals and engineering, and how any adverse impact will be mitigated will be included, accompanied by photography and dimensions. This will be presented as an appendix to the EIA Report. The crossings for this project are anticipated to be related to temporary access tracks. Material Balance and Peat Management: A material balance will be provided to demonstrate how excavated soils and peat will be re-used on site and how any surplus soils peat will be dealt with. This will be presented as an appendix to the EIA Report. Should the proposed infrastructure impact upon more significant areas of peat; a peat management plan will be provided including information on peat depths, peat characteristics, peat storage and re-use.
Scottish Natural Heritage (now NatureScot)	Pre-Application Consultation	23/03/2018	Chapter 7: Ornithology	Part of the route will pass through or be close to the Glen Etive and Glen Fyne SPA for golden eagles. To minimise these impacts, we suggest the following design principles are followed. • undergrounding of the cable from the sub-station on the east side of Loch Awe through to Dalmally and the Creag Dhubh substation.	Undergrounding is being considered from the Dalmally substation to 1 km south of the A85, see Section 5 below for further details.
Pre-Application Responses 2020					
Argyll and Bute Council	Pre-Application Consultation	27.10.2020	Chapter 8 : LVIA	Response represents initial and informal views of Planning Officers and does not represent any binding opinion on the Council in respect of any future proposals. Any future proposals will require to be considered against the Local Development Plan (LDP) Planning Policies and Wider Policy Framework. Depending upon the date of any future application, the emerging LDP 2 document should be considered and given appropriate weight in any route proposals. A landscape sensitivity evaluation has been undertaken by the Council in respect of the ability and sensitivity of the landscape of Argyll and Bute to absorb windfarm development. This should be used to inform future SSEN proposals for large scale infrastructure and should be considered in seeking to finalise any proposals and in undertaking any future EIA in respect of landscape impacts. Loch Awe is partly within the designated North Argyll Area of Panoramic Quality (APQ) and sections of the overall infrastructure proposals would appear to be proposed within this requiring special attention to ensure significant and unacceptable impact on the APQ does not arise with specific reference to SG LDP ENV 13. Option 1 would remain the least favoured route option in the opinion of the council at this time due to concerns over potential landscape, cultural and amenity impacts (no change from 2018 consultation response). The Council can identify no reason to discount the proposed underground routes at Option 2, which would represent the best option in respect of landscape impact. It is noted that SEPA and Scottish Water have not at this stage raised any concerns despite the RAG matrix suggesting that peat, and water pollution maters associated with construction and operation of an underground cable solution could be problematic.	SSEN Transmission will prepare a consenting strategy and will seek a formal scoping opinion on the environmental information to be provided within the EIA forming part of the application for Section 37 consent. It is noted that the emerging LDP 2 may need to be considered and we acknowledge the presence of the landscape sensitivity evaluation work the Council has undertaken. We will utilise this information and prepare a landscape and visual assessment as part of the EIA report. Further survey will be undertaken to identify sensitive receptors that will influence the design to ensure the project avoids and minimises potential environmental and landscape impacts.

				Option 3 would address the Council's previously expressed concerns over visual impacts within the Strath of Orchy and head of Loch Awe associated with Option 1 at this point. However greater detail on the exact location and nature of any intended new infrastructure is required before more detailed comment can be provided. The infrastructure investment is generally supported by NPF3, SPP, LDP and other policies of the Council. This does not detract from the need to ensure that significant environmental and landscape impacts are minimised, and also that any potential impacts on sensitive receptors are carefully considered in determining what route and options will ultimately be proposed by formal S37 application under the Electricity Act.	
Argyll District Salmon Fishery Board (ADSFB) / Argyll Fishery Trust (AFT)		24.09.2020		Argyll District Salmon Fishery Board (ADSFB) wish to be directly consulted on the specific proposals for each (watercourse) crossing. Their primary concerns are the protection and improvement of salmon and trout populations and their habitats.	Further consultation with ADSFB will be undertaken on the scope of environmental information to be provided with the application for consent through the Environmental Impact Assessment (EIA) Scoping Consultation. We propose that all interactions with surface watercourses, including crossings, will be identified and assessed in the EIA Report.
HES		24.09.2020		Historic Environment Scotland (HES) identified that all four route options presented for Option 3, will affect the designated Auchtermally Or Uachdar Mhaluidh, Deserted Township (SM 4019). HES advised that it should be possible to accommodate an OHL without raising issues of national interest; however, HES would need to see the proposed alignment and visualisations demonstrating the effects on the setting of this scheduled monument before being confident that significant effects can be avoided. More detailed assessment of potential effects on the site and setting of historic environment assets is required should Option 3 be taken forward.	Further consultation with HES will be undertaken on the scope of environmental information to be provided with the application for consent through the Environmental Impact Assessment (EIA) Scoping Consultation. We would propose that the EIA includes a comprehensive study of the potential for direct and indirect (setting) effects on heritage assets, which will include the Auchtermally Or Uachdar Mhaluidh, Deserted Township asset.
NatureScot		24.09.2020		NatureScot noted that an objection from a landscape perspective would be unlikely for Option 1 and they would be supportive of access improvements that would result from Option 2. NatureScot agreed that Option 3 appears to minimise landscape impacts. It was noted that Options 3 lies outside of the SPA designated for the protection of birds and, as such, no likely significant effects in terms of the Habitat Regulations are foreseen.	Further consultation with NatureScot will be undertaken on the scope of environmental information to be provided with the application for consent through the Environmental Impact Assessment (EIA) Scoping Consultation. This will include seeking confirmation of the scope of the EIA Report in relation to potential landscape and visual effects, effects on ecology (including habitats and protected species) and effects on birds.
SEPA		06.10.2020		For Options 1 and Option 3 SSEN can expect a standard response from SEPA given the limited detailed information that is required at this stage. Option 2 – SEPA do not necessarily have concerns regarding the principle of the undergrounding options. However, would make the following observations: Any work in or near the water environment has the potential to result in a significant adverse impact and therefore pollution prevention mitigation is required to prevent/minimise sediment pollution for the duration of the works. Work within an active flood plain may require special consideration. Watercourse crossings may require authorisation under the Water Environment (Controlled Activities) (Scotland) Regulations 2011 depending on what approach is finely decided upon. No objection in principle to any selected cable option at this stage but it is recommended that peat mass balance calculations information be provided. We would expect a detailed Stage 2 Peat Management Plan be provided within the EIAR if Option 2 is preferred. Any use of waste materials for restoration etc. may require an exemption from waste management licensing or a waste management licence. If SSEN are to choose an underground route option, then we recommend a further meeting take place before finalisation of an EIAR.	Further consultation with SEPA will be undertaken on the scope of environmental information to be provided with the application for consent through the Environmental Impact Assessment (EIA) Scoping Consultation. We would propose to include a detailed assessment of likely significant effects on the water environment and an assessment of potential interactions with peatland habitats. We also anticipate providing information on the management of peat (through a Peat Management Plan) and the potential for peat instability through a risk assessment.

Scottish Forestry		25.09.2020		Scottish Forestry (SF) stated that areas of woodland that are fragmented by the alignment should be left in a commercially workable condition, consideration to be given to access and ground conditions. Where possible route along the edge of woodland, this would be preferable to avoid felling and be mindful of edge design. Option 2, routes A5.1 and 5.2 have potential to create a corridor in woodland that may serve to highlight the line if not integrated by good woodland design. Option 3 - B1 Minimal woodland impact especially if microsite / alignment can avoid woodland. Potential to avoid need for native woodland removal to east and improve native woodland corridor connection with careful alignment. A2- mainly woodland edge impact. Increased woodland removal with switching station in woodland. A2 and B3 both have the potential for relatively large areas of woodland removal and dissect / fragment areas of woodland.	Further consultation with SF will be undertaken on the scope of environmental information to be provided with the application for consent through the Environmental Impact Assessment (EIA) Scoping Consultation. We would propose to include information demonstrating a detailed assessment of any areas of woodland removal required to create access tracks, an operational corridor and development platforms for the proposed connection. Consideration will also be given to any secondary or indirect felling potentially required because of the creation of the operational corridor. Where possible, woodland removal or fragmentation will be avoided through the next phase of design, which will include detailed alignment selection.
Scottish Water		16.09.2020 and 28.09.2020		Scottish Water (SW) The proposed falls 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. Cladich Intake supplies Cladich Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. It is a relatively small catchment therefore there may be less opportunity for dilution and a potential higher risk of activities affecting water quality. The fact that this area is located within a drinking water catchment should be noted in future documentation. Anyone working on site should be made aware of this during site inductions. 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. SW will need to review and agree the Pollution Prevention Plan and the Construction Environmental Management Plan. SW assets are present along the route = a 4” asbestos cement and a 125mm MDPE water distribution main near the northeast end of the route, a separate 4” asbestos cement water distribution main follows the route of the B8077. There is also a 3” asbestos cement raw water main near Claddich running northeast from the RWI.	Further consultation with SW will be undertaken on the scope of environmental information to be provided with the application for consent through the Environmental Impact Assessment (EIA) Scoping Consultation. We would propose to include assessment of likely significant effects on the water environment and mitigation proposals to avoid effects on the DWPA. It is noted that, where possible, interactions with the water environment will be avoided through the next phase of design, which will include detailed alignment selection.
Transport Scotland		08.09.2020		Transport Scotland (TS) will ask for details on construction generated traffic when a formal application comes forward, any changes to the trunk road network will need to be discussed and approved with the TS Area Manager, any crossing will require a detailed method statement, Network Rail will require to be consulted.	Further consultation with TS will be undertaken on the scope of environmental information to be provided with the application for consent through the Environmental Impact Assessment (EIA) Scoping Consultation. Traffic and Transport will be assessed as part of the EIA. Studies will provide details on construction generated traffic and identify suitable mitigation that may be required.
Scoping and Pre-Application Responses 2021					
Argyll and Bute Council	Scoping	26/09/2021	All	Creag Dhubh to Dalmally Overhead Line Scoping Response A summary of A&BC’s Scoping Response (Ref: 21/00286/SCOPE) is provided below covering key topics. The full Scoping Response is available on A&BC Planning website at the following link: https://portal360.argyll-bute.gov.uk/my-requests/document-viewer?DocNo=22523956 The full scoping submission (Ref: ECU00002199) is available on the Energy Consent Unit’s website at the following link:https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00002199&T=0 1. Consideration of Alternatives: The EIA should include a description of the reasonable alternatives (in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposal and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	Noted Creag Dhubh to Dalmally Overhead Line Scoping Response 1. Consideration of Alternatives – Noted. Chapter 3, of the EIA, will contain this information. 2. Built Elements – Noted. This information will be provided in the EIA. Planning Policy Context – Noted. As part of the planning submission, we will provide a Planning Policy Statement that will give due consideration to LDP 2. 4. Landscape & Visual Amenity – Viewpoints have been agreed with A&BC. Future felling and potential increased

				This should include the results of the community consultation exercises which have been undertaken at time of submission of the S37 application. This should include information on the alignment choice from tower 33 to the proposed GLSS (which at time of writing is understood to still be subject to community consultation) prior to a final alignment being chosen within the preferred route corridor. 2. Built Elements The EIA should identify the location of all built elements, including access tracks and any related and required borrow pits to facilitate access track provision, both temporary and permanent, which should be sited to avoid habitats of importance, wetlands, areas of deep peat and blanket bog, watercourses and abstractions, in order that areas of particular vulnerability to damage from development, or which have higher pollution sensitivity, may be protected from unnecessary impacts associated with the development. The assessment should address the construction, operational and decommissioning phases of the development. It should also be noted that the Council would expect the access to/from the site to the junction with the public road to be included within the site edged red. Sufficient details should be provided within the EIA to clarify where any engineering operations, including formation of access tracks and roads junctions are required with final details being subject to CEMP and a traffic management plan (TMP). 3. Planning Policy Context Although at a relatively early stage in its development and currently therefore being afforded limited weight, your attention is drawn to the emerging LDP 2. Depending upon the date of any future application this may have reached a stage in the adoption process where the weight to be afforded to this will be increased. Therefore, the applicants should ensure that the status and weight to be afforded to the policies and land use allocations/designations in this emerging LDP 2 document are both considered, and given appropriate weight, in any policy evaluation. 4. Landscape & Visual Amenity The Planning Authority recommends that the following additional viewpoints are provided: • From the Oban railway line in vicinity of “Brackley” and also towards the proposed Glen Lochy switching station (as part of cumulative impact assessment) • From the curtilage of Brackley towards the towers • Viewpoints to south and west from Duncan Ban Monument • From the old military road • Viewpoint 18 should look to north east and north west. • Viewpoint 19 should look to north east and north west The principal consideration should be to ensure that the proposed Creag Dhubh Substation and Glen Lochy Switching Station locations assimilate into the landscape to the greatest degree possible. It is noted that there are elements of commercial forestry of various ages around the proposed locations, and therefore the future felling and potential increased landscape impacts associated with this expected, and predictable, felling regime should be factored into landscaping proposals for both developments. 5. Ornithology, Biodiversity, Ecology All surveys should be carried out at the optimum time of year by a suitably qualified person and include mitigation. Links to: A Biodiversity Technical Note for Planners and Developers, Argyll & Bute Council, February 2017 and Pollinators in Planning and Construction, A brief guide for the development sector, Scottish Natural Heritage, August 2019 are provided below: https://www.argyllbute.gov.uk/sites/default/files/biodiversity_technical_note_feb_2017_4.pdf https://www.nature.scot/sites/default/files/2019-09/Pollinators%20in%20Planning%20and%20Construction%20Guide.pdf The applicant is advised to follow the good practice set out in these documents. Please note that the views of the Councils biodiversity officer are awaited and will be forwarded in due course. 6. Cultural Heritage Given that a final alignment has not been provided for the route from tower 33 to the proposed Glen Lochy switching station the potential route would take the line within close proximity to the Duncan Ban Monument. Although the line would be at a lower level than the monument it is considered that the scale and proximity of the line could be harmful to the setting of this Category B Listed Building. As a local high point the setting and character of the monument is sensitive to what could be large industrial scale infrastructure in close proximity to it. The Council will have regard to the views of HES on this matter once the final alignment and design details have been finalised. It is considered that	landscape impacts will be considered in the EA Landscape & Visual Impact Assessment Chapter. 5. Ornithology, Biodiversity, Ecology – Noted. Guidance that has been followed will be included in the EIA. 6. Cultural Heritage – Potential impacts to the Duncan Ban Monument will be scoped into the EIA. Additional visualisation viewpoints have also been included, refer to HES consultation response. 7. Traffic, Transport & Access – Potential borrow pits will be identified within the EIA and further exploration of Borrow Pits will be undertaken following planning submission. 8. Summary – Noted. Scope will include any additions raised in the HES and NatureScot responses. The following outstanding A&BC consultation responses remain: Local Biodiversity Officer, Environmental Health Officer, Area Roads Engineer.

				the potential impact on the Duncan Ban Monument should be specifically scoped into the EIA and addressed in some detail. 7. Traffic, Transport & Access The EIA should both clarify and commit SSEN to the exploration of the use of borrow pits in advance of the submission of any TMP, and a condition requiring a phased approach to this exercise to seek to reduce traffic movements and movement of construction materials long distances by road is considered appropriate. 8. Summary Table 13.1 provides a summary of the EIA scoping report and clarifies what issues are proposed to be scoped in and out of the EIA. The Planning Authority is in general agreement with the conclusions of this. However, the Planning Authority defers to the views of other consultees in respect to their relevant field of expertise, and in particular Scottish Nature and Historic Environment Scotland. It should also be noted that outstanding internal consultation responses will require to be considered when available. Consultations undertaken. Responses awaited. • Argyll & Bute Council Local Biodiversity Officer • Argyll & Bute Council Environmental Health Officer • Argyll & Bute Council Area Roads Engineer • Argyll & Bute Council Archaeological Advisors the West of Scotland Archaeology Service (received 22.07.2021)	
Argyll District Salmon Fishery Board	Scoping	03/03/2021	Chapters 6: Biodiversity, 7: Ornithology and 10: Hydrology.	We would like to draw attention to the important salmon and trout spawning and nursery habitats in the Teatle Water, Allt Fearna and the Claddich River which the proposed new line will potentially cross. We ask that the developer to demonstrate that stream crossings, the development of the road network and construction of pylon foundation are undertaken in a sensitive manner that maintain the quality and accessibility of the habitat to fish.	Noted. The Proposed Development comprises the route from T28 to T40 and has evolved to avoid crossing the Strath of Orchy. Where stream crossings are proposed, this will be managed through measures set out in the CEMP.
Brackley Farm	Pre-Application Consultation	15/07/2021	All	1. Can the reasoning/ justification for the RAG (Red/Amber/Green) scoring for the route be explained, especially when considering the protection afforded to the commercial forestry plantations and equally not credited to the farm land on Brackley? 2. What considerations have been given to the wider environmental impact on the agricultural land at Brackley? 3. How much of the information used in the preparation of the preferred route has been from desk top studies? 4. Is it possible that the environmental/ ecological/ bird surveys used in the preparation of the route options are provided? 5. The information noted in the consultation arising from the surveys on Brackley farm appears to have anomalies; a. 'possible' badger sets are definitely active – has this been noted correctly? b. There is a second Black Grouse Leck which has not been noted on the surveys c. There is little or no mention of flora in the consultation surveys on Brackley – what surveys have been conducted in this regard? d. What peatland surveys have been completed? e. What surveys have been completed and over how many visits were the surveys conducted and during what time period? 6. How do SSE propose to mitigate their impact on the Black Grouse lecks, as suggested in the consultation? 7. There are areas of felled commercial plantation (forestry) which are not noted as such on the plans in the consultation pack, this is therefore not accurate – why? 8. There is no mention of the damage to peat areas from construction and how this will be mitigated – why? 9. There appears to be no consideration taken of the potential negative impact on sequestered carbon in the peatland areas which will be damaged during construction – why? 10. How do SSE propose to reinstate/ remedy damaged peatland habitats following construction?	SSEN provided an email response to these queries on 15/07/2021

				11. The peatland areas on Brackley are classified as being in poor condition – how has this been arrived at/ decided? 12. There is no mention of road/ access to pylons at this stage – what are the options SSE are considering in this regard and are any of these going to be permanent? If so, what guarantees are SSE providing as to security for landowners? This is also important where there may be access required through currently secure property boundaries. 13. The route is stated that it is not to go through commercial forestry to avoid fragmentation of woodland, despite a possible fringe/ edge alignment, yet it crosses through at least 1 area of ancient oak woodland which will result in the felling of trees – how can has this been justified? 14. Has any consideration in the consultation been given to the impact on the business and lives of those who are working/ farming the land at Brackley, or any other holdings? There is little or no discussion of this anywhere. a. If so, what scoring criteria has been used to appraise this? 15. There is no mention of the impact of the project on aspects like management of the wild deer populations – has this been considered at all? a. If so, how? 16. Have SSE considered the impact of this being an online consultation given the infrastructure issues in the area with broadband etc?	
[redacted]	Public Consultation	28/09/2021 and 08/03/2022	Chapter 10: Hydrology	The water supply for [redacted] is provided by a spring which is situated between towers [redacted]. A plan showing the water catchment area for this has been provided to SSE as additional information with this consultation response. The spring has provided water to t[redacted]for a number of years and it is a real concern that the works will disrupt the spring and affect the water supply and quality thereof to [redacted]. It is understood SSE have carried out a geological survey of the preferred route so should be aware of this and as such assurances are being sought that the works will not impact [redacted] water supply	SSEN responded on 08/03/2022: • PWS are identified and discussed in the EIA. Measures are identified to protect water supplies during construction. • A detailed pre-construction PWS risk assessment will be completed by the contractor. This would re-confirm the locations of the PWS sources on-site, pre-construction monitoring of water quality and ensure appropriate pollution prevention measures are in place. • During construction water quality would be monitored. If the quality and/or quantity of water to the PWS is impacted by the Proposed Development, a temporary alternative source will be supplied until remedial works are completed. • Water quality will be monitored immediately following construction to confirm the PWS is unaffected. • Standard PWS procedures will be applied by the principal contractor and set out in the CEMP to protect PWS water quality and supply during construction works.
BT	Scoping	02/03/2021	Chapter 2: Description of Proposed Development	We have studied the Locations of the Tower Structures for Creag Dhubh to Dalmally 275 kV Connection proposal with respect to EMC and related problems to BT point-to-point microwave radio links. We have assumed a maximum Tower Height of 60m as indicated in section '2.4 Indicative Overhead Line Design' of the scoping report. Tower Number 18 runs directly under BT Radio Link 6140 from DALMALLY POLICE SITE to	Noted.

				KILCHRENAN TE. If these Tower heights increase above 60m you will need to resubmit your proposal and BT will reassess the impact accordingly. With the Tower Height at 60m the conclusion is that the Project indicated should not cause interference to BT's current and presently planned radio network.	
Energy Consents Unit	Pre-Application Consultation	02/08/2021	All	Thanks for letting the ECU know about the progress with your forthcoming application. Unfortunately I will not be able to take part. ECU case officers like myself and Lesley now only deal with submitted applications under the Electricity Act 1989 or other process under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. We also can provide a half hour EIA pre-application meeting and a gate-check when you are ready to submit however we no longer have the capacity to be involved outside these processes. I look forward to hearing from you in due course when you're ready for EIA application / gatecheck.	Noted
Glasgow Prestwick Airport	Scoping	03/03/2021	-	This proposed development lies outwith the safeguarding area of Glasgow Prestwick Airport (GPA) – and consequently should this development come to a full planning application GPA will have no aviation objection to the development.	Noted.
Historic Environment Scotland	Scoping	08/04/2021	Chapter 9: Archaeology and Cultural Heritage	The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings. In this case, you should contact the West of Scotland Archaeology Service (WoSAS).	Noted - WoSAS has also been contacted as a consultee.
Historic Environment Scotland	Scoping	08/04/2021	Chapter 9: Archaeology and Cultural Heritage	The following designated historic environment assets [listed in the rows below] are in the vicinity of the development and have the potential to be impacted by it. This list is not considered to be exhaustive, and we would recommend that a wider search is undertaken of the surrounding area for potential impacts in the first instance. Any direct impacts should be mitigated by avoidance and impacts to the settings of assets should be assessed appropriately to determine whether these will be significant. We recommend that an appropriately detailed ZTV should be used to identify potential setting impacts in the first instance. We welcome that the scoping report indicates that a ZTV will be used, however, consideration should be given to including assets where even though the ZTV indicates that no direct intervisibility would be possible there is the potential for the OHL to appear in the background of key views towards these assets.	Noted - Responses provided below.
Historic Environment Scotland	Scoping	08/04/2021	Chapter 9: Archaeology and Cultural Heritage	**Direct Impacts - Scheduled Monuments** Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019): We note that section 11.4 on potentially significant effects refers to the potential for direct effects on non-designated assets within the LOD but does not refer to direct effects on designated assets. There is currently the potential for direct effects on a scheduled monument located within the preferred route corridor at the north section of the OHL. While we consider it possible that an alignment for the OHL could be accommodated within this route without raising issues of national interest, this will be very much dependent on the detailed design of any alignment proposed. Any detailed route alignments should ensure that direct impacts on designated historic environment assets are avoided, in line with national policy. This includes both the pylon structures themselves and any ancillary development such as access tracks.	Noted. In line with national policy the route of the Proposed Development (towers and infrastructure) has been designed to avoid any direct impacts on Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019).
Historic Environment Scotland	Scoping	08/04/2021	Chapter 9: Archaeology and Cultural Heritage	**Impacts on Setting of Assets - Scheduled Monuments** Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019): For the north section of the route from T33 to the proposed new switching station at Glen Lochy, we consider that it may be possible to accommodate a carefully designed alignment which follows the edge of the forestry to the north west and north of Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019) within this preferred route. However, we would need to see the proposed alignment and visualisations demonstrating the effects on the setting of this scheduled monument before we could be confident that significant effects can be avoided. We welcome that the scoping report identifies that the potential impacts on the setting of this monument are a key consideration and that visualisations will be required. We consider that photomontages are likely to be required to demonstrate the impacts on the setting of this asset. We strongly recommend further consultation with us at the earliest stages of considering alignment options to ensure that appropriate mitigation by design is built into this section of the OHL.	HES have requested that photomontages be provided for Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019). The list of visualisations required has been updated to take account of HES comments and further consultation is to be undertaken with HES in respect of this. A consultation letter to WoSAS setting out the proposed visualisations and viewpoint types for their approval will also be prepared.

Historic Environment Scotland	Scoping	08/04/2021	Chapter 9: Archaeology and Cultural Heritage	**Impacts on Setting of Assets - Scheduled Monuments** Tom a'Chaisteal, dun, Teatle Water (SM 4209) Dychlie, deserted crofts (SM 5149) For both of these scheduled monuments we consider it likely that any impacts on their settings from the preferred alignment would be unlikely to raise issues of national interest. However, given the proximity of the OHL to these assets we welcome that the scoping report identifies potential impacts on the setting of these two assets as key considerations and that visualisations will be required to demonstrate the impacts. We recommend that photomontages are produced demonstrating the impacts on these monuments. Kilchurn Castle, Dalmally (SM 90179 & PiC) Fraoch Eilean, castle (SM 2219) We welcome that an assessment of the potential impacts of the proposed development on the setting of these assets will be undertaken and that visualisations will be produced to demonstrate the impacts. We would be happy to review wirelines in the first instance and confirm whether full photomontages should be produced for these assets. For all of the above assets, the visualisations should be used to assess the scale of adverse impacts that are likely at these monuments and whether any mitigation, for example through micro-siting of towers would be likely to reduce the impacts. The assessment will also need to consider if micro-siting within the proposed limit of deviation might increase impacts on assets. In particular, it may be that any movement of the proposed line closer to either Dychlie deserted crofts (SM5149) or Tom a'Chaisteal, dun (SM4209), where the line passes between them, would increase impacts on one or the other monument. It may also be relevant to consider precisely where the towers could be located to minimise impacts on these two monuments. We would welcome consultation with us, when these visualisations have been produced, prior to submission of any application, to discuss what mitigation may or may not be desirable with regard to historic environment interests.	HES have requested that: photomontages be provided for Tom a'Chaisteal (SM4209) and Dychlie, deserted crofts (SM5149); and visualisations, either photomontages or wirelines, be provided for Kilchurn Castle (SM 90179 & PiC) and Fraoch Eilean (SM 2219). As above, the list of visualisations required has been updated to take account of HES comments and will be consulted on with HES and WoSAS for approval. In respect of Kilchurn Castle (SM 90179 & PiC) and Fraoch Eilean (SM 2219), Ramboll propose to cross reference to the LVIA VPs which will comprise wirelines/photomontages.
Historic Environment Scotland	Scoping	08/04/2021	Chapter 9: Archaeology and Cultural Heritage	**Category A listed buildings** Glenorchy Kirk Clachan An Diseart (LB 12192) We welcome that the potential impacts of the proposed development on the setting of this category A listed building will be assessed. We are content that the proposed viewpoint from the associated scheduled monument will likely be sufficient to demonstrate the impacts on the setting of the category A listed building. St Conan's Church of Scotland, Lochawe (LB 4700) We recommend that the potential impacts of the proposed development on the setting of this category A listed building are assessed. The garden and terracing around St Conan's are clearly intended to take advantage of the scenic location. We recommend that a visualisation from the area to the south east of the church is provided to demonstrate the potential impacts on its setting.	As above, the list of visualisations required has been updated to take account of HES comments and will be consulted on with HES and WoSAS for approval.
Historic Environment Scotland	Scoping	08/04/2021	Chapter 9: Archaeology and Cultural Heritage	**Inventory gardens and designed landscapes** Ardanaiseig House (GDL 00018) We recommend that the potential impacts of the proposed development on the Inventory garden and designed landscape should be assessed. There are important views from the garden and designed landscape along and across Lochawe, and a historic relationship with Inishail (and the scheduled monument located there), which would likely be affected by the proposed development. We consider it likely that the proposed visualisations from the category B listed Ardanaiseig House and from Inishail will also demonstrate the potential impacts on the garden and designed landscape. However, we are happy to provide further advice on visualisations if that would be helpful.	Noted. Assessment of the impact on the settings of Ardanaiseig House (GDL 18) is set out in Section 9.6 and in TA 9.2 (EIAR Volume 4). A wireline is provided for Ardanaiseig House GDL from the location agreed with HES (Figure 9.13, EIAR Volume 3a). A list of cultural heritage visualisations included in the assessment is provided in **Table 9.5 (Chapter 9: Archaeology and Cultural Heritage: EIAR Volume 2)** and details on visualisation types and locations are provided in **TA 9.3 (EIAR Volume 4).**
Historic Environment Scotland	Scoping	08/04/2021	Chapter 9: Archaeology and Cultural Heritage	Further information on good practice in cultural heritage assessment can be found in Appendix 1 of the EIA Handbook. We welcome that our Managing Change guidance note on setting and the EIA Handbook will be used in the assessment of impacts on historic environment assets. We would be happy to provide advice on a more detailed methodology, as suggested in the report, if that would be useful. We welcome that mitigation measures for significant effects will be set out. The Historic Environment Policy for Scotland (HEPS 2019) was adopted on the 01 May 2019 and replaced the Historic Environment Scotland Policy Statement (HESPS 2016). The Historic Environment Policy for Scotland is a	HES comments are noted. HES's Managing Change guidance note on setting and the EIA Handbook will be used when undertaking the cultural heritage assessment.

				strategic policy document for the whole of the historic environment and is underpinned by detailed policy and guidance. This includes our Managing Change in the Historic Environment Guidance Notes. All of these documents are available online at www.historicenvironment.scot/heps. Practical guidance and information about the EIA process can also be found in the EIA Handbook (2018). Technical advice is available on our Technical Conservation website at http://conservation.historic-scotland.gov.uk/.	
Historic Environment Scotland	Pre Application Consultation	13/08/2021	Chapter 9: Archaeology and Cultural Heritage	HES recommended a couple of additional CH viewpoints for inclusion within the OHL EIA: 1) Tom A'Chaisteal Dun Scheduled Monument; and 2) Kilchurn Caste Scheduled Monument.	These viewpoints will be included within the EIA. In regards Tom A'Chaisteal Dun, HES are keen to understand the impact of the proposed OHL on inward views to the Dun and have noted a potential location for the viewpoint to the northwest around Arteatle, with the viewpoint looking back along the Teatle River to the Dun with the OHL in the background. Given the forestry cover surrounding the Dun itself a view in this direction would obviously include the forest and there would be no direct visibility of the Dun at this time, however, taking into consideration HES comments we feel that it would be prudent to include a photo-wire for this view, if this were possible. We have identified a viewpoint location around 213012, 725029 looking approximately ESE towards the Dun (centred at 213947, 724767) – please see screen grab for approximate viewpoint location. The area in which the viewpoint location is positioned may have woodland (deciduous tree) cover, however the surrounding forestry appears to have been recently felled, and hopefully there will be a sufficient open view along the Teatle Water towards the Dun to provide a visualisation looking towards this asset. Kilchurn Castle In regards Kilchurn Castle, HES advised that visitors can access the upper levels of the castle and have recommended that we include a viewpoint showing the OHL in these upper-level views. We have identified that there is a viewpoint platform at the north-east tower of the castle located at c. 213307, 727609 and have calculated an approximate viewing height of 58m AOD (see attached figure, red arrow pointing to the location of viewing platform for reference). We suggest that we include a wireline from this upper-level viewpoint within the CH chapter and this together with cross reference to the LVIA viewpoint (photomontage), from the castle, should be sufficient to cover all of HES recommendations.
Historic Environment Scotland	Pre-Application Consultation	13/08/2021	Chapter 9: Archaeology and Cultural Heritage	Our remit is World Heritage Sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories. Please also seek information and advice from Argyll & Bute Council's archaeology and conservation services for matters including unscheduled archaeology and category B and C-listed buildings. We have provided specific comments on potential impacts of the section of the scheme between Tower 28 and the Glen Lochy substation on historic environment assets within our remit in the attached annex. Further information is required to fully understand the potential effects on the setting of some of the assets within our remit. We recommend that our Managing Change in the Historic Environment guidance note on setting should be used when considering	Further, follow-up consultation was undertaken with HES by exchange of letters. A letter was sent 23/07/2021 responding to points raised in HES's consultation response and providing details of additional visualisation viewpoints requested by HES and the format of visualisations. A response was issued on 06/08/2021 in which no further issues were raised and the visualisation viewpoints and formats were agreed.

				setting impacts as the project progresses. Further good practice advice on the assessment of impacts on cultural heritage can also be found in Appendix 1 of the EIA Handbook. https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=80b7c0a0-584b-4625-b1fd-a60b009c2549 HES have no concerns over the minor changes to the proposed substations. Summary of Annex (refer to consultation report for full response): Our preferred option is the baseline option as it presents the least impact on the setting of Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019), Tom a'Chaisteal, dun, Teatle Water (SM 4209) and Dychlie, deserted crofts (SM 5149). Whilst alignments GL1 to GL4 all lessen the impact on the setting of Dychlie, deserted crofts (SM 5149) compared to the baseline, by locating the route further from the monument and by utilising topography to set the line marginally lower in the landscape, these alignments would be closer to and uphill of, and therefore have an adverse increased impact on the more sensitive setting of Tom a'Chaisteal, dun, Teatle Water (SM 4209). Alignment GL5 would increase the impact on the setting of Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019) as it brings the line closer to the monument and locates it at a greater altitude, thus increasing its prominence in outward views. We are concerned that these impacts do not appear to have been thoroughly considered in the assessment process so far and sufficient information has not been supplied regarding the closest new element of the proposals, T29, which is likely to be a significant cause of any impacts. This information is required in order to better understand the potential impacts and inform any resulting mitigation, such as line avoidance and relocation of towers. We would be happy to provide more detailed comments if further information can be supplied to assist with the assessment of impacts. We recommend that visualisations showing the impacts of the Preferred Alignment and alternative options from the 3 scheduled monuments would be helpful. If it would be helpful for us to engage with your cultural heritage advisors regarding these impacts and the assessments, we would be happy to do so.	By way of summary, the consultation letter noted the following: - In regards the potential direct impact on Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019), it was confirmed that, in line with national policy, the proposed OHL will be designed to avoid the Scheduled Monument and avoid any direct impact on the monument. - Following site visits to assess the potential impacts of the Proposed Development on the setting of heritage assets within a 5 km study area, it was confirmed that Tom a'Chaisteal, dun, Teatle Water (SM 4209) is currently surrounded by commercial forestry plantation which largely limits views out from the monument in all directions. Given the current forestry cover, it was advised that a photomontage from this viewpoint will not adequately show the potential impact of the Proposed Development on the setting of the monument. Instead, it was suggested that a photo-wire visualisation (where the towers are overlaid on top of the baseline photography) would be the most effective means of portraying the potential visual impact in the event that the forestry is removed.
NATS Safeguarding	Scoping	10/02/2021	Chapter 13: Traffic and Transport	NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.	Noted.
Nature Scot	Pre-Application Consultation	24/08/2021	Chapter 8: Landscape and Visual Impact Assessment	1. During our initial site visit with key stakeholders for this proposal we discussed the need for the transmission line not to be on the skyline along the SE side of Loch Awe at its northern end and for the inevitable skyline of the line crossing SE to Creag Dhubh substation to be minimalised. This was to be achieved by utilising landscape features for shielding and low routes to accommodate the line running parallel to Loch Awe (NE to SW) . NatureScot also advised that the line should be kept out of the Golden Eagle SPA. 2. From the maps provided It is not possible to determine whether these design principle, and hence minimising these landscape impacts, have been maintained. As such, if they have increased impacts on the setting of the northern part of Loch Awe, I request these specific elements be identified and differences shown in wireline diagrams for further discussion.	The alignment of the OHL has been situated to sit across the lower lying moorland hills of the Craggy Upland LCT, away from the more elevated and open hilltops to the east. Existing forestry plantations and areas of woodland would provide varying degrees of screening of the proposed development as it crosses this hillside. Additionally, woodland associated with the edges of Loch Awe would also provide more localised screening in views from the water body and its shorelines. Where visible, the alignment would be back clothed by topography. The Proposed Development does not intersect with Glen Etive and Glen Fyne SPA, classified for breeding golden eagle. It does run approximately 40 m from the SPA at its closest point, which is within potential connectivity distance. A full assessment of the potential impacts of the Proposed Development on the SPA shall be undertaken in the EIA Technical Appendix 7.3: Habitat Regulations Appraisal, which shall review field survey data and desk study data, including PAT modelling, to determine ifs Likely Significant Effects are possible. In the area where the OHL crosses the A819 to extend into the Creag Dhubh substation, it routes along the toe of Craig nan Sassanach, which would backcloth the

					OHL. Towers 1 – 4 climb onto slightly higher topography to enter the substation which may incur some marginal sky lining in views from the west of Loch Awe. Mitigation landscaping proposals for the substation will seek to reduce these/ filter these. The realignment of the OHL to extend into Glen Lochy, rather than pass through the Strath of Orchy, has reduced its impact on the setting of the northern part of the loch by moving it away from the loch and following the contours of the hillside.
NatureScot	Scoping	10/03/2021	All	The key issues NatureScot require to be addressed in detail as part of the EIA process include: - Landscape and visual impacts, including cumulative impacts. - Ornithological impacts, including impacts on Glen Etive and Glen Fyne Special Protection Area for golden eagle. - Impacts on nationally important carbon-rich soils, deep peat and priority peatland habitat.	Noted. These issues have been addressed within Chapters 8, 7 and 10 of EIAR Volume 2.
NatureScot	Scoping	10/03/2021	Chapter 8: Landscape and Visual Impact Assessment	The proposed LVIA works, as detailed in chapter 12 of the scoping report, will provide adequate assessment of the landscape and visual impacts of this proposal. We note and agree with the proposed View Point selection indicated in table 12.2. The consultation letter was also sent to David Moore at ABC.	Noted. Due to changes in design of the preferred alignment, a consultation letter was sent on 22/07/2021 to confirm the amended list of viewpoints when removing those that are now considered obsolete. A response from Nature Scot was requested by the 6th August. NS confirmed agreement via telephone conversation, however no written response was provided.
NatureScot	Scoping	10/03/2021	Ecology	The proposed scope of methodologies and surveys of the key ecological receptors identified in Chapter 5, should adequately assess the overall ecological impacts.	Noted.
NatureScot	Scoping	10/03/2021	Chapter 7: Ornithology	The route of the power line runs adjacent to a short length of the boundary of Glen Etive and Glen Fyne Special Protection Area (SPA) for golden eagles at Achlian Farm (please see: https://sitelink.nature.scot/site/10113 for further details on this designated site). As such the Habitat Regulations will need to be considered before any application can be determined (please see: https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal-hra for details). Whilst the ongoing use of the line, once constructed, will not have any impact on the SPA, there is some scope for impact during construction from disturbance. It is not possible to determine the full magnitude of this impact at this time, however, a commitment in a construction method statement, to avoid any part of the SPA for accessing the works site, including overflying by helicopters, is likely to be sufficient for NatureScot to conclude, and so advise, that there will be no likely significant effect in relation to the Habitat Regulations, when responding to a future consultation on the formal application for this development. When assessing the ornithological impacts it is important that the following guidance is used https://www.nature.scot/guidance-assessment-and-mitigation-impacts-power-lines-and-guyed-meteorological-masts-birds.	HRA likely required. The CEMP will include a commitment to avoid any part of the SPA for accessing the works site, including overflying by helicopters. The CEMP will be secured by a carefully worded planning condition.
NatureScot	Scoping	10/03/2021	Chapter 10: Hydrology	The proposal includes areas of class 2, 3 and 5 peatland (Scot Gov 2016 peatland map). As such, there may be priority peatland habitat present which will need to be identified and best practice taken into account when micro-sighting or identifying mitigation for this proposal. The NVC for the “proposed OHL alignment 2020” section (fig 1.1) from T33 to the east appears to be missing. This will need to be completed and submitted as part of the EIAR submitted with the application. The following guidance should be followed for surveying the peatland resource: https://www.gov.scot/publications/peatland-survey-guidance. For information, the following guidance may help with identifying best practice for priority habitat: https://www.nature.scot/advising-carbon-rich-soils-deep-peat-and-priority-peatland-habitat-development-management. It was noted that the Phase 1 habitats map (figure 5.2) shows an extensive area of E1.7 “Wet Modified bog”, which includes a small rectangular of E1.6.1 “Blanket Sphagnum bog”. There is no obvious difference in bog condition between these areas so this may be a mapping error.	The NVC survey east of T33 was carried out. the potential mapping error which shows wet modified bog surrounding blanket bog will be checked The Proposed Alignment intersects Class 2 peatland between T34 and T42. EIAR Volume 2 Chapter 10, sets out best practice measures when micro-siting and identifying mitigation.
RSPB Scotland	Scoping	05/03/2021	Chapters 6: Biodiversity, and 7: Ornithology.	<u>Designated Site</u> The site is within close proximity and, for distance of 1km, directly borders the Glen Etive and Glen Fyne SPA designated for supporting a population of Annex 1 species (list of the EC Birds Directive) golden eagle Aquila chrysaetos. Although this proposal is not directly situated within the SPA, there is potential for it to impact on a	Habitat Regulations’ Appraisal undertaken as set out in TA 7.3: Habitat Regulations’ Appraisal (EIAR Volume 4).

				golden eagle territory which is part of the wider golden eagle population in this area and any indirect impacts should be considered in the EIAR. We agree with the proposed approach for the Habitat Regulations Assessment outlined in the scoping report.	
RSPB Scotland	Scoping	05/03/2021	Chapters 6: Biodiversity, and 7: Ornithology.	Bird Species of Conservation Concern The following Annex 1 bird species have been highlighted in the scoping EIA report as occurring within or close to the proposal: golden eagle, white-tailed eagle, hen harrier, peregrine and merlin. Other Birds of Conservation Concern and important Local Biodiversity Action Plan (LBAP) species include black grouse. The potential impacts on all of these species should be adequately covered within the EIAR. It should be remembered that all nesting birds are protected by law and therefore we would advise that if any vegetation removal is required along the route that this should occur outwith the breeding season (March- August inclusive) or that these areas are checked prior to work starting to ensure no nesting birds are present.	Birds of Conservation Concern were included in the species identified during field surveys as described in TA 7.1: Ornithology Methodology and Results (EIAR Volume 4).
RSPB Scotland	Scoping	05/03/2021	Chapters 6: Biodiversity, and 7: Ornithology.	Survey requirements From the information provided in the scoping report we agree with the species identified to be included in the EIAR. The EIA should establish how these species are using the site area through the vantage point observation surveys, plotting of flight lines and related information to determine any potential impacts.An assessment of the forestry and open ground habitat suitability for raptors, black grouse and breeding waders should be undertaken and should consider present usage in comparison to the potential alteration of habitat and displacement effects which may occur during and due to the development.	Impacts on nesting birds is assessed in paragraphs 7.5.8 and 7.5.9, with mitigation set out in Section 7.5.13 of Chapter 7 (EIAR Volume 2)
RSPB Scotland	Scoping	05/03/2021	Chapter 7: Ornithology.	Golden and white-tailed eagle As mentioned previously and within the scoping report, the proposal lies in close proximity to the Glen Etive and Glen Fyne SPA designated for its golden eagle population. Although the proposal footprint does not fall within the SPA there is potential for it to impact up on it and we advise that a Habitat Regulations Assessment is undertaken as is suggested with the scoping report. We also have records showing a golden eagle territory close to the proposal, we would advise consulting Argyll Raptor Study Group as they will be able to provide the most up to date information relating to this territory (NA21) and other raptor species activity within this area. White-tailed eagles are increasingly being reported from around this area, via both visual sightings and satellite tag information and it is noted from the scoping report that a white-tailed eagle nest was observed within 500m of the proposal. We advise that since birds occupy this area, ongoing assessment and mitigation are required. Survey work should therefore occur throughout the planning and installation period.	Impacts on golden and white-tailed eagle are assessed in Sections 7.5.7, 7.5.11 and 7.5.20 (**Chapter 7, EIAR Volume 2).** Impacts on golden eagle, specifically on birds from the Glen Etive and Glen Fyne SPA, are discussed in TA 7.3: Habitat Regulation' Appraisal (**EIAR Volume 4**). This included reference to PAT modelling data provided by NatureScot. Pre-construction surveys for white-tailed eagle are also recommended.
RSPB Scotland	Scoping	05/03/2021	Chapter 7: Ornithology.	Black grouse In Argyll terms, the wider spread of birds within this area is important and any proposal should fully assess impacts on this species, including noise, and should avoid siting towers close to any lek sites. Consideration should also be given to mitigation works for the species within the site and surrounding area.	Impacts on black grouse are discussed in paragraph 7.5.12, with mitigation proposed in paragraph 7.5.16. Cumulative impacts on this species are also discussed in Table 7.5 (EIAR Volume 2).
RSPB Scotland	Scoping	05/03/2021	Chapters 6: Biodiversity, and 7: Ornithology.	Habitats & habitat management/mitigation The EIAR should include a full survey, impact assessment and proposals for mitigation in relation to important habitats on this site. Mitigation should ideally minimise any impact and avoid areas of high-quality habitats found upon the site. Particular attention should be given to peatland. Figure 7.1 highlights that the majority of the site falls into Class 5 and is located within commercial forestry. There are however a few towers that are proposed to be built on Class 2 peatland. The majority of the 'preferred route option 3' also falls on Class 2 peatland. We would recommend that when the plans for this develop further that this section should be constructed in the footprint of commercial forestry to safeguard the peatland and open habitat in this area. A full assessment of the carbon implications of this proposal should be undertaken. A mitigation plan for any peatland affected by the proposal should also be put forward. The proposals footprint also cuts across several areas highlighted under the Ancient Woodland Inventory, any loss of this habitat should be minimised and if unavoidable compensatory planting should be undertaken with advice taken from NatureScot. The EIAR should consider what mitigation measures are required to minimise the impact on important species and contain detailed ecological justification for any such proposals. Ideally, this should include relevant time frames for mitigation in relation to site development.	Habitat Regulations' Appraisal undertaken as set out in TA 7.3: Habitat Regulations' Appraisal (EIAR Volume 4). . Peatland and general habitat management are detailed in **TA 10.2 Outline Peat Management Plan and TA 6.3:Outline Habitat Management Plan (EIAR Volume 4).**
RSPB Scotland	Scoping	05/03/2021	Chapter 7: Ornithology.	Cumulative impacts An assessment of cumulative bird impacts in relation to other existing, consented and proposed projects (predominantly forestry and wind farms), within this natural heritage zone (NHZ) should be undertaken.	A cumulative impact assessment has been undertaken assessing developments within NHZ 14. Details of the assessment are provided in Chapter 7 (EIAR Volume 2).

RSPB Scotland	Pre-Application Consultation	13/08/2021	Chapter 7: Ornithology	We have concerns with the preferred route in its current layout due to the impact on important peatland habitat and the proximity to a black grouse lek. The section we are referring to runs from tower 35 – 40. We do not have any major concerns with this route from tower 40 through tower 47 and would support this section as it prevents the loss of 0.8ha of important ancient semi-natural woodland. **Alterations to route** With regards to the section covering 35 – 40 we would recommend that this section follows the route outlines in GL1 which runs through the commercial forestry, this eliminates the impact on the peatland and pulls the overhead line back to 500m away from the black grouse lek. This would reduce the impact of the overhead line on the biodiversity of the area and important open habitats. As the footprint of this route would fall within commercial forestry which will be felled as part of the management the impact on the biodiversity of the area would be minimal in the long-term. **Mitigation** If the proposed route is chosen along with the modification, we mention above we would strongly suggest that any construction work is undertaken outside of the main lekking period to reduce the disturbance on the black grouse lek. We would also ask that the powerlines near the lek are marked to increase visibility to reduce collision risk for black grouse. We would also recommend that any compensatory tree planting that takes place is done to increase the amount of native woodland in the area through planting or although existing native woodland to expand naturally through natural regeneration.	Ramboll/SSEN to consider including marking of towers to mitigate impacts on black grouse lek. Route GL5 was ultimately chosen as preferred, but as discussed above access tracks have been altered to accommodate black grouse leks and Species Protection Plans (SPP)s shall be adhered to during construction. Black grouse lek locations have been identified, with impacts described in paragraph 7.5.12 and mitigation set out in paragraph 7.5.16 of the EIAR. An access track towards Tower 36 has been moved to avoid impacts on black grouse and SPPs shall be adhered to. Line marking is not considered to be required for black grouse, following the analysis of flight data collected (in Table 7.4). Compensatory planting, to create habitats for black grouse, will be undertaken as set out in the Biodiversity Net Gain Assessment, to be provided following the submission of the EIA.
Scottish Forestry	Scoping	12/03/2021	Chapter 11: Forestry	The woodland Reports, landscape and hydrology information relating to The woodland felling and woodland loss should be available at The same time as The ES and not left to post consent. There may be opportunities to restore priority peatland habitat and guidance for woodland is available here and here. A summary of The woodland aspects should be included which cross-references all The chapters where woodland issues are covered. All efforts should be made to have as little impact as possible on The ancient woodland sites.	Noted – Technical Appendix 11.1 (EAIR Volume 4)will cover Forestry plans and all foresty impacts will be covered in Chapter 11 (EIAR Volume 2)
Scottish Forestry	Pre-Application Consultation	12/08/2021	Chapters 8: Landscape and Visual Impact Assessment, 10: Hydrology, and 11: Forestry.	Scottish Forestry advised that both the UK Forestry Standard -4th Edition – 2017 (UKFS) and Scottish Governments Control of Woodland Policy 2009 (CoWRP) are relevant to all three projects. As with previous projects, forest design and wider felling need to be taken into account, with similar landscape work being completed as per Inveraray Crossaig. In addition, the hydrology of development felling in context with the normal forest activity needs to be considered in relation to any sensitive waters, including Loch Awe. Specific Comments: 1. LT29 alignment options. I am content with the description of GL5 diversion decision, which, despite a slightly increased impact on coniferous woodland, does minimise the effect on the Ancient Woodland. 2. Glen Lochy Switching Station 3. Creag Dhubh Substation The minor alterations proposed at Glen Lochy and Creag Dhubh, do not appear to have any additional impacts on woodlands than the previous proposals, and so I have no further comments to make.	Comments from Scottish Forestry are noted. Guidance provided in the UK Forestry Standard -4th Edition – 2017 (UKFS) and Scottish Governments Control of Woodland Policy 2009 (CoWRP) has been and will be adhered to in the development of the proposed design. It is also confirmed that the hydrology of development felling will be considered in the environmental assessments in relation to any sensitive areas.
The Scottish Rights of Way and Access Society	Scoping	03/03/2021	Chapter 13: Traffic and Transport	At present, we do not have capacity to respond to scoping requests regarding Overhead Lines as a matter of course. That said, the applicant is welcome to approach us directly for a formal consultation response if they consider that information about public rights of way and other recreational routes could assist in the preparation of their application.	Noted -
Scottish Water	Scoping	17.02.2021		Audit of Proposal Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following: Asset Impact Assessment According to our records, the development proposals impact on existing Scottish Water assets. The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team via our Customer Portal to apply for a diversion. The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction. Please note the disclaimer at the end of this response. Drinking Water Protected Areas A review of our records indicates that the proposed activity falls partly	Noted. Cladich Drinking Water Catchment is referred to in EIAR Chapter 10. Scottish Water and SSEN discussed catchment sensitivities at a meeting held 10/12/2021.

				within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. The Cladich Intake catchment supplies Cladich Water Treatment Development Operations The Bridge Buchanan Gate Business Park Cumbernauld Road Stepps Glasgow G33 6FB Development Operations Freephone Number - 0800 3890379 E-Mail - DevelopmentOperations@scottishwater.co.uk www.scottishwater.co.uk ANNEX A Page 47 To find out more about connecting your property to the water and waste water supply visit: www.scottishwater.co.uk/business/connections SW Public General Works (WTW) and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number 0800 0778 778 and local Scottish Water contact details will be provide prior to construction work commencing. The chosen route will run through the Cladich Intake catchment and towers 4 – 8 all have the potential to impact the operational capability of Cladich WTW, the surrounding drinking water catchment and associated assets. Therefore the risk to drinking water quality and quantity is high. There are also a number of Scottish Water assets along the route. There is a 4" asbestos cement (AC) and a 125mm medium-density polyethylene (MDPE) water distribution main near the northeast end of the route. These pipes appear to be in the road verge running past the substation. A separate 4" AC water distribution main follows the route of the B8077 and there is also a 3" AC raw water main near Cladich running northeast from the raw water intake (RWI), which was confirmed in our response regarding the route options. Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm. We welcome that reference has been made to the Scottish Water response to the previous consultation. The fact that this area is located within a drinking water catchment should be noted in future documentation. Also anyone working on site should be made aware of this during site inductions. We would request further involvement at the more detailed design stages, to determine the most appropriate proposals and mitigation within the catchment to protect water quality and quantity. In particular we need to better understand your planned access routes and if any water crossing points will be required within the Cladich Intake catchment. If you have to cross the AC raw water main at any point, we would ask SSEN to pay for a new main with designated crossing points before construction work commences, We would also like to take the opportunity, to request that 3 months' notice is given in advance of any works commencing on site, Scottish Water must be notified at protectdwsources@scottishwater.co.uk. This will enable us to be aware of activities in the catchment and to arrange a site meeting, which will be necessary. Surface Water For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system. ANNEX A Page 48 To find out more about connecting your property to the water and waste water supply visit: www.scottishwater.co.uk/business/connections SW Public General There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges. In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.	Specific mitigation for the catchment is included along with further regular liaison with Scottish Water to agree working methods.
SEPA	Response to consultation letter issued September 2021, followed by consultation meeting October 2021	September 2021	Chapter 10: Hydrology, Hydrogeology and Geology and Soils	Consultation seeking comments on the draft Outline Peat Management Plan, specifically regarding the proposed strategy for mitigating potential adverse effects on peat, and measures for re-using surplus peat from the construction of the associated Creag Dhubh substation, <u>but the same principles discussed apply for the Proposed Development:</u> SEPA Response: SEPA confirmed there were no objections with regard to the re-use of peat to dress slopes and shoulders around the substation platform and tracks. SEPA also support the minimising excavation for temporary infrastructure such as construction compounds through the use of geotextile membranes and stone on top of peat, and reinstated on completion. SEPA does not accept the use of peat in mounds and bunds. SEPA outlined that the Applicant are to explore potential restoration opportunities with possible partners such as Loch Lomond and Trossachs National Park, and to identify if any peat extraction sites are located close to the development site for restoration using surplus peat generated. Agreement in principle with potential land owners to	Consultation with SEPA, as summarised in the meeting notes presented in **TA 10.7**, has informed the Outline PMP as presented in **TA 10.2, EIAR Volume 4**.

				be provided post submission. There are planning and waste permitting considerations to be aware of if taking peat off site.	
Transport Scotland	Scoping	02/03/2021	Chapter 13: Traffic and Transport	Methodology:The SR states that the study area will include the A85(T). Transport Scotland is satisfied with this approach, and would add that the assessment should establish if there are likely to be any significant environmental effects associated with increased traffic on the trunk road network, and any requirement for further trunk road assessment.With regard to base traffic, the SR states that existing traffic flow information would be requested from Argyll and Bute Council, Transport Scotland and the Department for Transport (DfT) open traffic count site. It also states that should there be a requirement for new traffic count data, this would be obtained through the use of a week-long deployment of Automatic Traffic Counters (ATC). Given the current COVID19 situation, Transport Scotland would not consider any new traffic data collected to be representative, and instead would suggest an alternative source of traffic data - Traffic Scotland's National Traffic Data System (https://ntds.trafficscotland.org/). We note that baseline data will be adjusted to an agreed future base case using Low Growth National Road Traffic Forecast (NRTF) estimates. This is considered appropriate. The SR makes no mention of the possibility of abnormal load deliveries being required; therefore, Transport Scotland would assume there will not be any. In the event that these are required, Transport Scotland will require to be satisfied that their transportation will not have any detrimental effect on structures within the trunk road route path. We would request an Abnormal Loads Assessment be carried out, with the potential impact on the trunk road being established.	Noted – this assessment considers the traffic impact on the trunk road network. This response was provided in March 2021 when travel behaviour was significantly impacted by the Covid-19 pandemic as people were advised to work from home and avoid travel where possible. The situation is much improved since March and at the time of writing this chapter (and collecting the new traffic survey data), there are no restrictions on local travel behaviour. It is therefore considered appropriate to use a combination of new and historic (factored up to the current year) traffic data. Consideration is given to the composition of the traffic on the road network, under both existing and proposed conditions. For example, cars and LGVs have less effect on traffic and the road system than HGVs. Similarly, HGVs can have less effect than abnormal load vehicles, depending on the frequency of the abnormal loads.
Transport Scotland	Pre-Application Consultation	03/08/2021	Chapter 13: Traffic and Transport	It should be noted that Transport Scotland will only provide formal comment on Environmental Impact Assessment consultations if formally consulted by the Energy Consents Unit (ECU) as, from 1st October 2015, local planning authorities were no longer required to consult with Scottish Ministers on EIA development. Should the application be submitted under the Electricity Act 1989 or other process under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, then ECU will formally consult Transport Scotland and comments will be sought on the EIA.	Noted.
West of Scotland Archaeology Service	Scoping	22/07/2021	Chapter 9: Archaeology and Cultural Heritage	Agree with proposed methodology outline in the scoping report chapter concerning cultural heritage and look forward to further consultation proposed during the project.	Noted. The methodology and study areas used for the assessment are set out in Section 9.2: Assessment Methodology and Significance Criteria (EIAR Volume 2).
Scoping and Pre-Application Responses 2022					
BT	Scoping – Request for further comments	09.03.2022		We have studied this Windfarm proposal using the co-ordinates attached, with respect to EMC and related problems to BT point-to-point microwave radio links. The Project indicated should not cause interference to BT's current and presently planned radio network.	Noted.

				Towers XYW/XYE 18 (listed on the picture below as WID11747 T20) and XYW/XYE 47A (listed on the picture below as WID11747 T49) do cross our radio link path. As the structure heights are quoted as 56.9 metres (XYW/XYE 18) and 49.23 metres (XYW/XYE 47A) they will be well below our radio link. This means they will not impact our service. If any of this information is different or changes, please let us know and we will reinvestigate.	
HES	Scoping – request for further comments	28.02.2022	Chapter 9: Archaeology and Cultural Heritage	No further comments were provided in addition to those received in August 2021 (see 2021 responses section above).	Noted.
MOD	Scoping – request for further comments	02.02.2022	-	No concerns raised.	Noted.
NatureScot	Scoping – request for further comments	19.01.2022	Chapter 7: Ornithology	Yes, we would believe that the line marking as you propose would be sensible, as an area close to the breeding area, in order to reduce collision risk though it does not eliminate it. We have relevant guidance at: https://www.nature.scot/doc/guidance-assessment-and-mitigation-impacts-power-lines-and-guyed-meteorological-masts-birds. Section 6 details various mitigation measures which may help to reduce the impacts of power lines on birds in addition to a section on line marking. Line marking is one, not the only, option to be considered. Will there be a post construction monitoring programme? How far is the power line from the nest? If it is within 500m of construction activities etc. it will need to be assessed against potential WTE disturbance (method statement on how to minimise disturbance risks for any works within 500m).	Line marking will be undertaken on a Section of the earth wire of the Proposed Development. The line marking location is provided in **TA 7.2: Confidential Results and Mitigation (Confidential Volume).** Line marking would involve installing bird diverters along approximately 840 m of the earth wire. The type and distribution of bird diverters would be agreed prior to their installation with NatureScot. The detailed design would consider NatureScot Guidance[2] and is anticipated to be similar to the approach used on the Inveraray to Crossaig OHL project, of which construction of phase 1 is complete and phase 2 is currently in construction. In the event that any confirmed, or suspected active nests are identified within range of potential disturbance, then a works exclusion zone will be established around the nest site to a distance as set out in the Bird SPP and as advised by the ECoW. Works will not be permitted to commence within the exclusion zone until nesting has been completed and the young have fledged, or the ECoW deems, through monitoring each stage of the breeding attempt, that the extent of the exclusion zone may be reduced. There is potential for significant disturbance of WTE species whilst nesting. The construction activity on the Section closest to the white-tailed eagle nest will be timed to avoid the key territorial and breeding season between February to August. Construction phase monitoring would be carried out by the ECoW, to ensure compliance with environmental legislation and effective delivery of mitigation measures (and licence conditions) set out in the generic and works-specific SPP. This would include monitoring of the white-tailed eagle nest identified during field surveys, with monitoring required through to the completion of the construction phase, and any other potential breeding raptor nests that could be impacted by the Proposed Development.

[2] NatureScot (2016) Assessment and Mitigation of Impacts of Power Lines and Guyed Meteorological Masts on Birds. Guidance.

				In terms of the cumulative NHZ14 assessment of WTEs the recent WFs Catriona referred to will probably be the best starting point.	All relevant cumulative developments within NHZ14 have been assessed in Section 7.7 **of Chapter 7 (EIAR Volume 2).**
NatureScot	Scoping – Request for further comments	03.03.2022		Thank you for your email on 23 February 2022 requesting comments from NatureScot regarding the further information provided by the Applicant in June 2021 in regard to Alignment selection. Section 6.1 of the Consultation Document lists a number of questions for consideration by consultees. I can confirm that the need for project (Q1) and the approach undertaken to select the Preferred Alignment (Q2) have been explained adequately. From our perspective you don't appear to have overlooked any natural heritage interests that could be impacted by the proposal (Q3). I include comments in response to the remaining question (Q4) below. Deviation GL5 is within 100m of a black grouse lek site. According to data collecting in 2020, two lekking males were observed (Appendix A_R170_3673_Figure5.9_BlackGrouse_20201203_A). As noted in the Consultation Document, 500 m is the minimum distance recommended to avoid disturbance; though this would be a temporary construction phase impact and it is likely that mitigation measures could be agreed, for example by the creation of temporal protective buffers. The construction of access tracks, compounds and other ancillary infrastructure etc. will also need to be carefully considered during this phase in conjunction with the OHL. However, there is a risk of the lek site being displaced once construction is complete and the OHL operational to its proximity. The potential impact could be mitigated by using Deviation GL1 which will also reduce the amount of peat/ blanket bog impacted by the proposal. Alternatively, a combination of Deviation and Baseline Alignment could be used, if possible, i.e. T33 – apex of GL1 north of T35 – GL1 to T40 – continue of GL5. Such a potential route, if possible, may have the combined advantages of Deviations GL1 And GL5. Additionally, should semi-natural broadleaved woodland be required to be felled, there should be an allowance for native compensatory planting.	Black grouse lek locations have been identified, with impacts described in paragraph 7.5.12 and mitigation set out in paragraph 7.5.16. An access track towards Tower 36 has been moved to avoid impacts on black grouse and SPPs shall be adhered to. Route GL5 was ultimately chosen as preferred, but as discussed above access tracks have been altered to accommodate black grouse leks and SPPs shall be adhered to. Black grouse lek locations have been identified, with impacts described in paragraph 7.5.12 and mitigation set out in paragraph 7.5.16. An access track towards Tower 36 has been moved to avoid impacts on black grouse and SPPs shall be adhered to. Line marking is not considered to be required, following the analysis of flight data collected (in **Table 7.4, EIAR Volume 2**). Compensatory planting, to create habitats for black grouse, will be undertaken as set out in the Biodiversity Net Gain Assessment, to be provided following the submission of the EIA.
Scottish Forestry	Scoping- Request for further comments	March 2022		**Woodland Management and tree felling** Where woodland removal is proposed for development, the relevant Environmental Impact Assessment (EIA) regulations will apply and the EIA Report should justify and provide evidence for the need for woodland removal and the associated mitigation measures. **The first consideration for the applicant should be whether the underlying purpose of the proposal can reasonably be met without resorting to woodland removal.** Design approaches that reduce the scale of felling required to facilitate the development must be considered and integration of the development with the existing woodland structure is a key part of the consenting process. Integration of the project into future forest design plans is a key part of the development process. **The removal of large areas of woodland will not be supported.** When a proposed development or infrastructure requires to go through forestry, consideration should be given to forest design guidelines. The proposal to consider the potential environmental impacts and likely significant effects associated with the seven elements of sustainable forest within the individual topic chapters, rather than in a Forestry Chapter is acceptable. This should be prepared by a suitably qualified professional and supported by existing records, site surveys and aerial photographs. In order to present the relevant information about the forest and to secure compliance with the UK Forestry Standard, the applicant should consider the appropriate scope for each topic chapter. The effects of felling, woodland removal and reestablishment should be considered (i.e., not just woodland removal). This should also include indirect impacts on adjacent woodlands.	The Proposed Development addresses this through minimising the woodland removal both through careful route selection and by defining the Operational Corridor (OC) appropriately for different woodland types. Compensatory planting to achieve no net loss of woodland for the Proposed Development, in-line with CoWRP objective is discussed within **Chapter 11 (EIAR Volume 2**). A Compensatory Planting Strategy is also provided in **TA 11.3 (EIAR Volume 4**). Woodland Reports **TA 11.1 (EIAR Volume 4**), which recommend proposals to landowners to remove this risk by identifying additional areas of felling out to the nearest 'windfirm' edge (known as a 'green edge'), where the trees have developed next to open ground have also been produced. The Proposed Development addresses this through careful route selection and by avoiding main woodland boundary edges where possible. The Proposed Development addresses this through the forestry assessment of the operational corridor and provision of the required management reports and plans.

				We recommend that each relevant chapter contain a section dedicated to the effect of woodland management activity. The loss of irreplaceable ancient woodland habitat must be given sufficient weight in the analysis, especially given the cumulative impacts of the SSE projects now on stream. We advise that within the Scottish Government's Control of Woodland Removal Policy, there is a strong presumption against woodland removal applied to the following: • Woodland types listed in the EC Habitats Directive; • UK BAP priority woodland types in areas mainly composed of ancient, semi-natural woodland (ASNW), ancient woodlands planted with native species, long-established woodlands of plantation origin (LEPO) with significant biodiversity interest, or well established semi-natural priority woodland types. The Scoping Report, P 62 -12.5 proposes the development of OHL Woodland Reports for each forest ownership impacted by the Proposed Development. The OHL Woodland Reports will identify all areas of felling required to form the operational corridor and access corridors. In addition, the OHL Woodland Reports would aim to reduce the risk of future wind throw by identifying felling to stable forest edges (outside of the operational corridor). The timing for provision of these reports is not stated and SF assume that they will be available with the EIA report consultation. The topic chapters should describe and recognise the social, economic and environmental values of the forest and the woodland habitat and take into account the fact that, once mature, the forest would have been managed into a subsequent rotation, often through a restructuring (re-designing) proposal, according to the UK Forestry Standard, that would have increased the diversity of tree species and the landscape design of the forest. The topic chapters should describe the baseline conditions of the forest, including its ownership. This will include information on species composition, age class structure, yield class and other relevant crop information. The chapter should describe the changes to the forest structure, the woodland composition and describe the work programme: • the proposed areas of woodland for felling to accommodate the proposed infrastructures, including access roads, tracks, underground pipes and cables and any ancillary structures. Details of the area to be cleared around those structures should also be provided, along with evidence to support the proposed scale and phasing of felling; • trees felled must be replanted on-site or compensated for (off-site planting) and these areas must be clearly identified in the plan. On-site replanting must always be considered first. The replanting operations must be appropriately described, including changes to the species composition, age class structure, timber production and traffic movements. Tree/shrub species must be suited to the site and the objectives of management; • areas of open ground in the forest that are designed for biodiversity or landscape enhancement or for recreation opportunities should not be considered for on-site replanting (to compensate for woodland removal in other parts of the forest). The applicant should consider the potential cumulative impact of existing and the proposed development on the forest resource in respect to the local and regional context. In particular consideration must be given to the implication of felling operations on such things as habitat connectivity, biodiversity, water management, landscape impact, impact on timber transport network and forestry policies included in the local and regional Forestry and Woodland Strategies and local development plans. It is important that pre-application discussions takes place with the local Scottish Forestry Conservancy office, the planning authority and other relevant key agencies, at the earliest possible stage of the project, to ensure all parties have a shared understanding of the nature of the proposed development, information requirements and the likely	Any permanent woodland removal outwith the OC is identified within this Chapter.

				timescale for determination. This collaborative approach will ensure that all forestry issues are identified and mitigated at the earliest opportunity. The applicant should allow sufficient time in their project plan to accommodate such advice.	
SEPA	Scoping – Request for further comments	01.02.2022	Chapter 10: Hydrology, Hydrogeology and Geology and Soils	Thank you for consulting SEPA on the above. We understand that the original consultation email was sent to us during the well documented cyber-attack on SEPA, however as the scoping opinion has not been issued as of yet SEPA have been now asked to provide formal scoping comments on the proposals. SEPA has engaged with the applicant, SSEN, on the original route options appraisal as well as discussing matters regarding peat management in relation to the proposed substation that is linked to this proposal. We are content that the applicant is aware of our requirements at this stage moving forward with the proposals, however for completeness, we offer the following comments on the Scoping Report. It appears that all interests in relation to SEPA's remit have been scoped in, which SEPA welcome at this stage. We note one of our main areas of thought at the route options stage was one of the option to underground a significant length of the connection, however this was not taken forward as the preferred option. In recent discussions with SSEN we have asked to review peat management assessments prior to an EIAR being submitted. I would like to highlight at this stage if the applicant wishes to submit assessments in relation to other areas of SEPA's interest prior to the publication of the EIAR then we would welcome this. I trust the above sets out clearly our position at this stage. If the ECU or applicant would like a copy of SEPA's standard comments then please refer to https://www.sepa.org.uk/media/144547/lups-l-14-windfarm-scoping-letter.pdf.	Noted.
SEPA	Scoping – Request for further comments	03.03.2022	Chapter 10: Hydrology, Hydrogeology and Geology and Soils	Creag Dhubh to Dalmally 275 kV Connection Thank you for your consultation email below providing the opportunity for SEPA to give further scoping comments on the above project. I note that the submission referred to provides further information on the preferred alignment from Tower 28 to the proposed Glen Lochy switching station and it gives an update on the switching station itself and related Creag Dhubh substation. In relation to the aspects of the new report that relate to the overhead line then we note that the preferred option, GL5, has the least impact on blanket bog peat habitats, which is welcome. The indicative locations of towers also seem to have a significant buffer to watercourses, which is also positive. The final layout should be shown to avoid impacts on the deepest peat, best quality peatland and GWDTE wetland habitats. Impacts from construction activities should be considered as part of this. Proposal for habitat restoration are noted, and again welcomed. In relation to other aspects of the project (which I appreciate you are not interested in, but I have copied in Jackie) then I am not sure what stage in the planning process they have now got to but I see that there have been discussions between SEPA and SSE regarding peat management at the Creag Dhubh substation site, most recently in October last year. The finalised layout should avoid the deepest areas of peat, minimise the footprint of the development and use methods such as piling and floating to avoid peat excavation wherever possible. Clear reuse options will need to be outlined as to how disturbed peat can be reused, and as discussed at that time, use of peat to construct landscaping bunds is not an acceptable use. If a genuine reuse option cannot be found for all the peat, then we suggest that an alternative layout or site is required.	As stated in the 2021 response section above, consultation with SEPA (**TA 10.7)**, has informed the Outline PMP as presented in **TA 10.2, EIAR Volume 4**. Further details on peat and peatland habitats are provided in **Chapter 10** and **Chapter 6: Biodiversity (EIAR Volume 2).**
Transport Scotland	Scoping – Request for further comments	08.03.2022	Chapter 13:Traffic and Transport	We have reviewed the information available via the ECU planning portal and note that no new information relating to traffic and transport appears to have been published since Transport Scotland submitted their consultation response on 02 March 2021. Therefore, the comments previously provided are still relevant and should be considered in the preparation of the EIA and any further development of proposals. Nevertheless, regarding our previous comments on the suitability of traffic data, we would note that data is no longer available from the link provided to Traffic Scotland's National Traffic Data System. We would also highlight that Department for Transport traffic count data is not considered to be an appropriate source of information for the assessment of effects on trunk road network links. As such, any trunk road traffic data informing the assessment can be requested from Transport Scotland.	Noted.