

APPENDIX 2.1: SUMMARY OF RESPONSES ROUTE STAGE

APPENDIX 2.1: SUMMARY OF RESPONSES AT ROUTE SELECTION STAGE

Table 2.1.1 - Consultation Responses from Statutory and Non-Statutory Consultees

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Statutory		
Historic Environment Scotland (HES)	In response to SSEN Transmission's specific questions relating to the consultation document, HES considered that the Consultation Document clearly and adequately set out the need for the project. HES were content that the approach taken to select the preferred route for the OHL was adequately explained. HES have not identified any assets within their specific remit that have been overlooked.	This has been noted.
	HES comments identified the assets within their remit which appear most likely to receive impacts from the Proposed Development, however, their list is not exhaustive and they advise that it will be important that a detailed and thorough assessment of potential impacts is carried out by experienced heritage professionals.	Potential impacts on historic monuments will continue to be reviewed as the project progresses through the alignment selection stage of the project.
	HES also reiterated that it is important to seek advice from the local authority archaeology and conservation advisors regarding the potential impacts from the development on historic environment assets out with their remit.	This has been noted. The local authority will be consulted.
	HES are content from the information presented at this stage that the proposed OHL is unlikely to have significant adverse impacts on the setting of designated historic environment assets within their remit.	This has been noted.
	<p>HES stated that none of the three routes proposed are likely to raise significant concerns for their remit. There are no designated heritage assets located within the route options, however, HES indicated that there is a cluster of monuments located at the south-east end of the route corridor at Invershin, including:</p> <ul style="list-style-type: none"> • Achinduich, hut circle 900m S of (SM1825) • Invershin Primary School, settlement 760m NE of and 750m ENE of (SM5462) • Invershin Primary School, settlement 600m E of (SM5498) • Invershin Farm, standing stone 220m ENE of (SM1791) • Invershin Farm, settlement and burnt mound 500m E of (SM5497) <p>HES pointed out that Invershin Farm, standing stone 220m ENE of (SM1791) is located on the valley floor and has a setting that likely references routeways through the landscape as well as the confluence of the River Shin with the River Oykle and views up and down the Kyle of Sutherland.</p> <p>HES note that the baseline setting of these monuments already includes a number of overhead lines approaching the existing Shin substation, as well as a major A road and a railway, and the proposed OHL would be on the far side of this existing infrastructure when viewed from the monuments.</p>	This has been noted. Potential setting impacts on historic monuments will continue to be reviewed as the project progresses through the alignment selection stage of the project.
	<p>HES noted that there are also a number of monuments clustered within Achany Glen and around Lairg to the north-east of the route corridor. They noted that whilst most have localised settings, exceptions include:</p> <ul style="list-style-type: none"> • Druim Baile Fuir, stone circle, cairns, hut circles and enclosure (SM1784) • Achany, chambered cairn 250m NE of (SM1759) • The Ord, chambered cairns, cairns, settlements and field systems (SM 1812) <p>HES is of the opinion that given the distance between these monuments and the proposed OHL, and the maximum height of the OHL at 16m, it is considered unlikely that significant adverse impacts on the settings of these assets will occur.</p>	This has been noted. Potential setting impacts on historic monuments will continue to be reviewed as the project progresses through the alignment selection stage of the project.
	HES agreed with the Consultation Document, in that, Route Option 1 and Route Option 1a could potentially have an impact on the setting of Invershin Farm, standing stone 220m ENE of (SM1791), with a greater impact caused by Route Option 1a as it would cross the Kyle of Sutherland in views upstream of the monument.	This has been noted. Route Option 1 was identified as the preferred route in the Consultation Document. ¹
HES agreed with the Consultation Document, in that in relation to Route Option 2, small sections of the proposed OHL could be visible from Druim Baile Fuir, stone circle, cairns, hut circles and enclosure (SM 1784), but that this would be backdropped by the consented Braemore Wood wind farm, and therefore the change to the baseline setting would only be very slight.	This has been noted. Route Option 1 was identified as the preferred route in the Consultation Document. ¹	

¹ SSEN Transmission (2022), Consultation Document: Route Options – Achany Wind Farm Extension Grid Connection (October 2022).

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>HES recommends that as the development progresses and further consultation is undertaken, a visualisation is provided showing Invershin Farm, standing stone 220m ENE of (SM1791) in its setting looking north-west towards the existing Shin substation and the proposed OHL. This would enable a full assessment of the impact of the proposed OHL on the setting of the monument.</p>	<p>This has been noted. A visualisation will be prepared and included with the section 37 application. to demonstrate the visual impact from Invershin Farm, standing stone 220m ENE of (SM1791).</p>
NatureScot	<p>NatureScot welcomed the opportunity to comment on this proposal at an early stage and the level of detail provided in the supporting consultation document. In summary, they agreed the Route Option 1 avoids crossing protected sites.</p>	<p>This has been noted.</p>
	<p>NatureScot noted that the route options lie close to Caithness and Sutherland Peatlands Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site, protected for its range of upland habitats, species (including marsh saxifrage and otter) and breeding birds.</p> <p>They highlighted that all three route options lie within connectivity distance for SPA bird species and SAC otter. In addition, where the route options run close to the SAC boundary, they have the potential to affect adjacent SAC habitats.</p>	<p>This has been noted. These nature conservation sites of international importance have been considered during the appraisal of route options, and will continue to be considered as the project progresses.</p>
	<p>Furthermore, NatureScot made the point that should Route Option 2 be considered further, the line will cross into this SAC for a short distance.</p> <p>Avoiding impacts to this site should be a key consideration in the design and routing of a proposal in this area. Where impacts are identified, careful and thorough assessment will be required to demonstrate that a proposal can be built in this location without adverse effects on the qualifying interests of the site.</p>	<p>This has been noted. Route Option 2 is not the preferred route option.</p>
	<p>In relation to SPA birds, survey work should follow the NatureScot guidance on power lines and survey methods for onshore wind farms.</p>	<p>This has been noted. NatureScot guidance on power lines and survey methods for onshore wind farms will be consulted.</p> <p>NatureScot also provided further advice to on the scope of bird survey work in their e-mail of 22 November 2022.</p> <p>In October 2023, NatureScot was contacted via email with an ornithology scope document. This was a document outlining the intended bird survey methodology for the project including proposed methodology for Vantage Point Surveys and Other Bird Surveys including breeding raptor surveys, and other upland breeding bird surveys.</p> <p>Following further correspondence with NatureScot, and clarification on some matters, NatureScot confirmed they were content with the proposed scope of ornithology surveys for the project.</p>
	<p>In relation to the SAC and otter, NatureScot outlined that further advice on survey and assessment is available on the NatureScot standing advice page.</p> <p>Where otter activity is identified, connectivity with the SAC should be fully considered as part of any future application.</p>	<p>This is noted. Further protected species surveys, in accordance with NatureScot guidance, will be undertaken as the project progresses.</p>
	<p>NatureScot suggests references to existing environmental information for nearby wind farms will also be useful when considering survey requirements for a proposal in this area.</p>	<p>This has been noted. Existing environmental information for nearby wind farms will also be consulted and used to inform an understanding of the baseline environment, where relevant.</p>
	<p>NatureScot point out that all route options will lie within the catchment of the River Oykel SAC, protected for its Atlantic salmon and freshwater pearl mussels. The potential for direct and indirect impacts to the SAC will therefore need to be considered further as part of any future planning application.</p> <p>Given the proximity of the route options and the SAC, pollution prevention and siltation measures will be very important to maintain good water quality and safeguard the SAC features. Any mitigation measures proposed should be fully detailed in any future application. NatureScot also recommend consulting SEPA in relation to impacts on the water environment.</p>	<p>This is noted, and further consideration of potential impacts to the qualifying features of the River Oykel SAC will be undertaken as the project progresses. This will include consideration of appropriate pollution prevention and silt control measures, and other mitigation measures where required.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>NatureScot pointed out that all 3 route options lie close to the Grudie Peatlands (SSSI), with Route Option 2 crossing into the site for a short section. The SSSI is protected for its blanket bog and breeding peatland waders (dunlin, golden plover and greenshank). It also forms part of the larger Caithness and Sutherland Peatlands SAC/SPA/Ramsar site, and their advice given for this site will also be relevant for the SSSI.</p>	<p>This has been noted. Route Option 2 is not the preferred route option. Further consideration of potential impacts to the Grudie Peatlands SSSI will occur as the project progresses, as necessary.</p>
	<p>NatureScot outlined that the Kyle of Sutherland Marshes SSSI is protected for its wet woodland, flood-plain fen and flowering plants. Both Route Option 1 and Route Option 2 avoid this SSSI. However, Route 1a will cross the SSSI in 2 places.</p>	<p>This has been noted. Route Option 1a is not the preferred route option.</p>
	<p>NatureScot mentioned that Route Option 1a will require felling of wet woodland to accommodate the overhead line wayleave. Based on the information provided, NatureScot advise it would be challenging to connect the line through the SSSI without it resulting in adverse effects on the natural features of the site.</p> <p>Route Option 1a would result in direct impacts and permanent loss of SSSI woodland.</p> <p>In addition, Route Option 1a would have the potential to impact the flood-plain fen and flowering plant features of the SSSI.</p>	<p>This has been noted. Route Option 1a is not the preferred route option.</p>
	<p>NatureScot confirmed that as per the Consultation Document, all three route options would pass through Class 2 and potentially some Class 1 areas of peatland. Class 1 and Class 2 areas are described as nationally important carbon-rich soils, deep peat and priority peatland habitat likely to be of high conservation value and restoration potential. These areas are afforded significant protection under Scottish Planning Policy.</p> <p>All route options therefore could have the potential to support peatland of national importance and further information will be required. As outlined in the consultation report, it will need to be demonstrated that any significant effects on these areas can be substantially overcome by siting, design or other mitigation measures.</p>	<p>Further consideration of potential impacts on peatland habitats will be undertaken as the project progresses. This will include a peat probing campaign, and if deemed appropriate, the preparation of a Stage 1 Peat Management Plan and Peat Landslide Hazard Risk Assessment to support a future application for consent.</p>
	<p>NatureScot outlined that the potential for impacts on protected species will need to be fully assessed as part of any future application. NatureScot agreed that reference to existing information for nearby wind farm will be helpful when considering the scope of survey work required.</p> <p>NatureScot referred SSEN Transmission to their standing advice for the relevant species for further information and advice. They also advised that any mitigation proposed for protected species should be outlined in appropriate Species Protection Plans (SPPs) and be included as part of any future planning application.</p> <p>Furthermore, NatureScot outlined that SSEN Transmission will also need to consider if any species licences will be required for these works and contact the NatureScot Licensing Team regarding any licence applications.</p>	<p>Protected species surveys will be undertaken and appropriate mitigation set out, including reference to SSEN Transmission Species Protection Plans.</p>
	<p>NatureScot referred SSEN Transmission to their pre-application advice document for further advice on assessing landscape and visual impacts. NatureScot recognise that all three route options would lie within Wild Land Area (WLA) 34: Reay – Cassley.</p> <p>NatureScot acknowledge that the new OHL will sit within the context of Achany Wind Farm Extension (once built) and therefore additional effects from this proposal may not be significant. However, this should be assessed as part of a landscape and visual impact assessment, to inform any future planning application.</p>	<p>This advice is noted. Input from a landscape architect will continue through the alignment selection stage of the project, and a landscape and visual impact assessment will be undertaken to support a future application.</p>
<p>Scottish Environment Protection Agency (SEPA)</p>	<p>SEPA consider that the following key issues must be addressed in the formal application:</p> <ol style="list-style-type: none"> Minimising impacts on peat and peatland. Avoiding good quality or rare groundwater dependent terrestrial habitats (GWDTE) habitats and minimising impacts on other GWDTE habitats. Avoiding impacts on watercourses and other water features by ensuring suitable buffers and using best practice design crossings. Outlining the re-use of timber that is not considered merchantable. 	<p>This has been noted. These issues will be considered further as the project progresses, and detail will be provided in support of a consent application.</p>
	<p>SEPA state that all maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements.</p>	<p>This has been noted, all maps would be based on an adequate scale with which to assess the information.</p>
	<p>SEPA states that the site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing:</p>	<p>Impacts on the water environment will be considered further as the project progresses, and appropriate details provided as part of a consent application.</p>

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	<ul style="list-style-type: none"> All proposed temporary or permanent infrastructure overlain with all lochs and watercourses. A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works. Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds. 	
	SEPA states that if water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.	No water abstractions or dewatering are anticipated to be proposed as part of the project.
	Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants must assess the likely effects of development on carbon dioxide (CO2) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO2 to the atmosphere. Developments must aim to minimise this release."	Further consideration of potential impacts on peatland habitats will be undertaken as the project progresses. This will include a peat probing campaign, and if deemed appropriate, the preparation of a Stage 1 Peat Management Plan and Peat Landslide Hazard Risk Assessment to support a future application for consent
	SEPA outlined that the planning submission must: <ol style="list-style-type: none"> demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO2, and; Outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas. 	Further consideration of potential impacts on peatland habitats will be undertaken as the project progresses. This will include a peat probing campaign, and if deemed appropriate, the preparation of a Stage 1 Peat Management Plan and Peat Landslide Hazard Risk Assessment to support a future application for consent
	SEPA outlined that the planning submission must include: <ol style="list-style-type: none"> A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Guidance on Developments on Peatland Survey (2017)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as GWDTE. a table which details the quantities of acrotelic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included. 	This is noted. Appropriate detail on peat depths and management will be provided in support of a consent application.
	Dependent upon the volumes of peat likely to be encountered and the scale of the development, SEPA advised that applicants must consider whether a full Peat Management Plan is required or whether the above information would be best submitted as part of the schedule of mitigation.	Further consideration of potential impacts on peatland habitats will be undertaken as the project progresses. This will include a peat probing campaign, and if deemed appropriate, the preparation of a Stage 1 Peat Management Plan and Peat Landslide Hazard Risk Assessment to support a future application for consent
	SEPA do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. Their advice on the minimisation of peat disturbance and peatland restoration may need to be considered when considering such assessments.	This has been noted.
	GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. SEPA requested that the following information must be included in submission: <ol style="list-style-type: none"> a map demonstrating that all GWDTE are out with a 100m radius of all excavations shallower than 1m and out with 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it. If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA are likely to seek conditions securing appropriate mitigation for all GWDTE affected. 	GWDTE habitats would be avoided as far as practicable with mitigation measures proposed where avoidance is not possible.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	<p>SEPA advise the applicant to refer to their Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice and the minimum information they require to be submitted.</p> <p>SEPA outlined that excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. They suggest that the submission must include:</p> <ul style="list-style-type: none"> A. A map demonstrating that all existing groundwater abstractions are out with a 100m radius of all excavations shallower than 1m and out with 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it. B. If minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected. <p>Large scale felling can result in large amounts of waste material and i release of nutrients which can affect local water quality. The supporting information should refer to the current Forest Plan if one exists and measures should comply with the plan where possible.</p> <p>Clear felling may be acceptable only in cases where planting took place on deep peat, and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats.</p> <p>Scottish Planning Policy states (Paragraph 243) that "Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place." The submission must provide sufficient information to address this policy statement.</p> <p>One of SEPA's key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration. SEPA outline that a schedule of mitigation supported by site-specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements.</p> <p>SEPA outlined that the submission needs to demonstrate that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing.</p>	<p></p> <p>If it is deemed that excavation and other construction works would disrupt ground water flow and groundwater abstractions, the submissions would include mapping as requested, and identification of appropriate mitigation measures.</p> <p>Potential impacts of felling would be considered as the project progresses, and information provided in support of a consent application.</p> <p>This is noted and will be reviewed once felling requirements are known.</p> <p>An assessment on the requirement of borrow pits would be made as the project progresses.</p> <p>Pollution prevention and silt control measures will be considered as the project progresses, and appropriate mitigation measures will be set out within a schedule of mitigation to accompany a future consent application.</p> <p>It is not anticipated that the project would result in the discarding of materials that are likely to be classified as waste.</p>
Non-Statutory		
Forestry and Land Scotland (FLS)	<p>FLS suggested that, SSEN Transmission should consult the Linside Common Grazing committee.</p> <p>In response to the Consultation Document, FLS outlined that they had a number of concerns with the three route options and would therefore be objecting to the proposal, on the following grounds:</p> <ul style="list-style-type: none"> o The visual impact of the wayleave cutting across the hillside through mature forest. o The loss of tree cover due to the line cutting through mature conifer crop. o The impact the line will have on forest operations in the future due to the chosen preferred route. 	<p>The Linside Common Grazing committee have been contacted regarding consultation in relation to the route options, although have not provided a response to date.</p> <p>SSEN Transmission have consulted with FLS further to understand their concerns in more detail and in order for these concerns to inform identification of a proposed route and the consideration of alignment options as part of the alignment selection stage of the project.</p>
Highfield Forestry Limited (HFL)	<p>HFL noted that they would prefer the OHL to travel as much to the east of the Rosehall Wind Farm boundary as possible to limit forestry management issues.</p> <p>HFL suggested that the route on the map is very wide, and it is therefore difficult to understand if the proposed development will affect them or not, they request further information regarding the exact routing if possible. HFL requested a clearer map in order to assess if an access agreement will be required between HFL and SSEN Transmission.</p>	<p>This has been noted.</p> <p>At this stage of the routeing process, route options are approximately 1 km in width. Once a proposed route is selected, alignment options are then identified and appraised within the 1 km route. Further consultation with HFL will be undertaken as the project progresses.</p>

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	HFL considered that the OHL may be an issue if the cables are particularly low as to restrict the type of vehicles they can bring onto their site. They believe there are guidelines for minimum heights. They would also expect 'goalposts' and extra signage around any track/ OHL crossings to ensure clearance and visibility of OHL is made clear to track users.	This would be discussed further with HFL during the alignment selection stage of the project to ensure HFL concerns are taken into consideration during the design of the project.
	HFL advised that the OHL should not come within the topple height of a turbine plus a significant margin, considering possible ice throw. Also considering any crane operation around a turbine and the possibility of the crane toppling (for example, generator replacement).	This has been noted. No turbine would be within three times rotor diameter of the OHL as per SSEN Transmission guidance.
	HFL stated that habitat management across Rosehall is to be reviewed by the habitat manager once the OHL route has been defined. They outlined that they would like to discuss this further with SSEN Transmission to assess the potential impact on habitats.	SSEN Transmission would welcome further conversations with HFL on these points.

Table 2.1.2 - Community Consultation Responses from The Public Exhibition Event by Topic

Feedback Comments	Response by SSEN Transmission
Lairg Exhibition Responses	
It was raised that an explanation as to why underground cables were not considered more would be welcome.	The most appropriate solution for the operation and maintenance of the network is considered to be OHL over UGC wherever possible. Maintenance of a line in the future must be considered. In the event of a fault on a line, the fault can be detected and rectified in a matter of days with OHL. However, if a fault occurs in an UGC, the time needed to locate and rectifying the fault increases and could potentially take months to fix and cause ongoing disruption to the land. This could result in the potential requirement for servitude on cable to ensure access. The servitude is usually 15 m wide and may require a degree of sterilisation. Undergrounding a line would result in increased impact to the surrounding ground, as well as the overall footprint of the project. The installation of UGC would require a cable trench, a 30 m construction zone with an approximately 6 m wide and 1.5 m deep trench to be dug. It is considered that this would increase potential to damage local environments during construction. The costs for UGC would also be approximately 4-6 times more expensive than an OHL option therefore not representing the best value for the consumer.
It was queried why Route Option 1a was included, as it is seemingly being dismissed, or removed as an option due to it coming across the Kyle of Sutherland SSSI.	Stage 2 (Route Selection) endeavoured to appraise a range of feasible route options between the two connection points at the proposed Achany Wind Farm Extension on-site substation to Shin substation. Due to constraints identified at the route selection stage, Route Option 1a is not considered the preference and will not be taken forward to Stage 3 (Alignment Selection).
It was mentioned that Route Option 1 passes close to several dwellings, which may be a concern to residents.	Any residents should have received information on the project by post and given the opportunity to raise their concerns. Proximity to dwellings will be considered further during Stage 3 (Alignment Selection) of the project and appropriate distances maintained as far as practicable.
It was noted that it was not entirely clear which route option was the preferred.	This has been noted. SSEN Transmission will endeavour to make this clearer at future consultation events. The preferred route option is Route Option 1.
It was mentioned that the resolution of maps shown was low, and therefore it was hard to read.	This comment has been noted for future consultation events.
It was raised that the public consultation event held in Lairg was useful, but that it may have been better placed at Rosehall, as Rosehall along with Darhm and Altrass are areas which may be affected more than Lairg. It was suggested that there could have been a larger attendance if the event was held in Rosehall.	This comment has been noted for future consultation events. Rosehall will be the location for the alignment selection stage consultation event. Consultation on the alignment options will likely take place in June 2023.