

# **Chleansaid Wind Farm 132 kV OHL Connection**

**Environmental Appraisal (EA) Report** 

**Appendix 4.1: Routeing Report on Consultation November 2024** 





# **Report on Consultation - Route Selection**

# **Chleansaid Wind Farm Connection**

Date: March 2023

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Figure 1.1 – Location

Figure 3.1 – Preferred Route

## **GLOSSARY**

Term	Definition
Alignment	A centre line of an overhead line (OHL), along with location of key angle structures.
Amenity	The natural environment, cultural heritage, landscape and visual quality. Also includes the impact of SHE Transmission's works on communities, such as the effects of noise and disturbance from construction activities.
Conductor	A metallic wire strung from structure to structure, to carry electric current.
Consultation	The dynamic process of dialogue between individuals or groups, based on a genuine exchange of views and, normally, with the objective of project decision making.
Corridor	A linear area which allows a continuous connection between the defined connection points. The corridor may vary in width along its length; in unconstrained areas it may be many kilometres wide.
Environmental Impact Assessment (EIA)	A formal process set down in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 used to systematically identify, predict and assess the likely significant environmental impacts of a proposed project or development and identify appropriate mitigation measures to avoid, prevent, reduce or offset likely significant adverse effects on the environment.
Groundwater dependent terrestrial ecosystem (GWDTE)	Wetlands which critically depend on groundwater flows and /or chemistries.
Habitat	Term most accurately meaning the place in which a species lives, but also used to describe plant communities or agglomerations of plant communities.
Kilovolt (kV)	One thousand volts.
Listed Building	Building included on the list of buildings of special architectural or historic interest and afforded statutory protection under the 'Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997' and other planning legislation. Classified categories A – C.
Micro-siting	The process of positioning individual structures to avoid localised environmental or technical constraints.
Mitigation	Term used to indicate avoidance, remediation or reduction of adverse impacts.
Overhead line (OHL)	An electric line installed above ground, usually supported by lattice steel towers or wooden poles.
Plantation Woodland	Woodland of any age that obviously originated from planting.
Ramsar Site	Wetlands of international importance, designated under the Ramsar Convention.
Riparian Woodland	Natural home for plants and animals occurring in a thin strip of land bordering a stream or river.
Route	A linear area of approximately 1km width (although this may be narrower/wider in specific locations in response to identified pinch points / constraints), which provides a continuous connection between defined connection points.

Term	Definition
Route (preferred)	A route for the overhead line taken forward to stakeholder consultation following a comparative appraisal of Route Options.
Route (proposed)	A route taken forward following stakeholder consultation to the alignment selection stage of the overhead line routeing process.
Routeing	The work undertaken which leads to the selection of a proposed alignment, capable of being taken forward into the consenting process under Section 37 of the Electricity Act 1989.
Scheduled Monument	A monument which has been scheduled by the Scottish Ministers as being of national importance under the terms of the 'Ancient Monuments and Archaeological Areas Act 1979'.
Semi-natural Woodland	Woodland that does not obviously originate from planting. The distribution of species will generally reflect the variations in the site and the soil. Planted trees must account for less than 30% of the canopy composition.
Site of Special Scientific Interest (SSSI)	Areas of national importance. The aim of the SSSI network is to maintain an adequate representation of all natural and semi-natural habitats and native species across Britain.
Span	The section of overhead line between two structures.
Special Area of Conservation (SAC)	An area designated under the EC Habitats Directive to ensure that rare, endangered or vulnerable habitats or species of community interest are either maintained at or restored to a favourable conservation status.
Special Protection Area (SPA)	An area designated under the Wild Birds Directive (Directive 79/409/EEC) to protect important bird habitats. Implemented under the Wildlife and Countryside Act 1981.
Stakeholders	Organisations and individuals who can affect or are affected by SHE Transmission works.
Study Area	The area within which the corridor, route and alignment study takes place.
Terminal Structure	A structure (tower or pole) required where the line terminates either at a substation or at the beginning and end of an underground cable section.
The National Grid	The electricity transmission network in the Great Britain.
Volts	The international unit of electric potential and electromotive force.
Wayleave	A voluntary agreement entered into between a landowner upon whose land an overhead line is to be constructed and SHE Transmission
Wild Land Area (WLA)	Those areas comprising the greatest and most extensive areas of high wildness. It is not a statutory designation, but wild land areas are considered nationally important.

#### **PREFACE**

This Report on Consultation has been prepared by WSP UK Ltd (WSP) on behalf of Scottish and Southern Electricity Networks Transmission (SSEN Transmission) to provide a summary of the responses received from key stakeholders (including statutory and non-statutory consultees, local communities, landowners and individual residents) on the Preferred Route identified for the proposed Chleansaid Wind Farm 132kV Overhead Line (OHL) Connection project, between the windfarm 132kV Substation to Dalchork Substation.

A Consultation Document was published in December 2022 which sought comments on the proposals, the approach to route selection, the analysis of route options and the identification of a Preferred Route.

This Report on Consultation describes how the feedback from consultation has informed the identification of the Proposed Route. Once confirmed, the proposed route is then taken forward for the subsequent stages of the project. Consultation has been conducted at Stage 2: Route Selection which seeks to find a route within the corridor which avoids where possible physical, environmental and amenity constraints, is likely to be acceptable to stakeholders, and is economically viable, taking in to account factors such as altitude, slope, ground conditions and access. The subsequent stages involve Stage 3: Alignment Selection which seeks to identify an alignment within the route and to define the access strategy which will be adopted in terms of, for example, the nature and extent of temporary and/or permanent access tracks and possible road improvements.

A face to face public consultation event was held between 3pm and 7pm on 24th January 2023 at Lairg Community Centre, Main Street, Lairg IV27 4DD. Attendees were able to engage directly with the project team where they could ask questions, they might have about the proposed Chleansaid Wind Farm 132kV OHL Connection project and share their feedback on the current proposals.

This Report on Consultation also provides a summary of how SSEN Transmission have responded to comments received by key stakeholders on the Preferred Route and details the actions that will be taken as the proposed Chleansaid Wind Farm 132kV OHL Connection project progresses through to the alignment stage.

#### **EXECUTIVE SUMMARY**

The developer of Chleansaid Wind Farm has submitted an application to the Scottish Government under Section 36 of the Electricity Act 1989 for a 96 megawatt (MW) Wind Farm and has a contracted connection date of 31st July 2027. Under the terms of their license, SSEN Transmission is therefore obliged to connect the developer to the transmission network by the contracted connection date. This will be achieved via the construction and operation of the new 132 kV overhead line (OHL) between the Chleansaid Wind Farm's 132 kV Substation to Dalchork 132 kV Substation. It is currently proposed that the OHL would comprise a wooden trident pole design.

This Report on Consultation documents the consultation process which has been undertaken for the project between December 2022 and February 2023. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, and the selection of the Preferred Route.

This report describes the key responses received and provides detail on the actions proposed in response to the issues raised. The consultation process has confirmed that Route Option 2 should be taken forward as the Proposed Route, within which further study will seek to identify alignment options.

It is recognised that the Preferred Route runs through a sensitive environment with challenging terrain. However, the Preferred Route has been selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors, and will become the Proposed Route taken forward to the alignment stage of this project.

#### 1. INTRODUCTION

#### 1.1 Purpose of Document

The Report on Consultation invites documents the consultation process for the project during December 2022 to February 2023, during the route option stage, from all interested parties on the Preferred Route identified for the construction of the Chleansaid Wind Farm 132kV overhead line (OHL) Connection project (the 'Proposed Development'). The Proposed Development will be supported on wooden trident poles and is approximately 10.5 km from Chleansaid Windfarm (proposed under Section 36 of the Electricity Act 1989) Substation to Dalchork Substation.

The programme of consultation was designed to engage with key stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the Preferred Route<sup>1</sup>.

The report describes the key responses received and details the actions taken in response to the issues raised.

#### 1.2 Document Structure

This Report on Consultation is structured as follows:

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

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

Part 3: Consideration of Route Options – describes how the Preferred Route was identified;

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

Part 5: Stakeholder Consultation Responses and key issues - summarises the range of responses and key comments arising from the public consultation and documents the Statutory and Non-Statutory Consultees whom responded through the consultation process;

Part 6: Project Responses to Consultation - describes how the comments and issues raised by Statutory and Non-Statutory stakeholders during consultation will be addressed; and

Part 7: Conclusions and Next Steps – provides a summary of the conclusions reached and actions going forward.

 $<sup>{\</sup>color{blue}1} \\ \textbf{Identified within the Chleansaid Wind Farm Connection Consultation Document (December 2022), produced by SSEN Transmission} \\$ 

#### 2. PROJECT OVERVIEW

#### 2.1 The Need for the Project

SSEN Transmission is a wholly owned subsidiary of the SSE plc Group of companies. SSEN Transmission holds a license under the Electricity Act 1989 for the transmission of electricity in the north of Scotland and has a statutory duty under Schedule 9 of the Electricity Act 1989 to 'develop and maintain an efficient, co-ordinated and economical electricity transmission system in its licensed areas'.

The developer of Chleansaid Wind Farm has submitted an application to the Scottish Government under Section 36 of the Electricity Act 1989 for a 96 megawatt (MW) Wind Farm and has a contracted connection date of 31st July 2027. Under the terms of their license, SSEN Transmission is therefore obliged to connect the developer to the transmission network by the contracted connection date. This will be achieved via the construction and operation of the Proposed Development (refer to **Figure 1.1**).

#### 2.2 Alternative Options Considered and Preferred technology Solution

For a connection of this length and scale an underground cable is not a feasible option due to costs involved during construction as well as ongoing maintenance problems associated with underground cables in remote areas including terrain, access and the presence of watercourses and associated flood zones, potential undesignated assets and peat. As such, all Route Options explored were OHL routes and the Route Options considered were the connection point of the OHL into Dalchork Substation.

#### 2.2.1 Preferred Technology Solution

While SSEN Transmission has determined that a new 132 kV OHL supported by trident H-wood pole is the preferred solution, it is recognised that there may be potential environmental and technical considerations that require the use of alternative technology options for lengths of the connections, such as elevation or river crossings. However, until a Proposed Route for OHL has been identified and further environmental and engineering studies are undertaken at the alignment stage, the requirements for other technology options is unknown.

#### 2.3 Proposals Overview

SSEN Transmission is proposing to construct a new 132 kV OHL supported on wooden trident ploes, between the Chleansaid Wind Farm's 132 kV Substation to Dalchork Substation. For the purposes of this report, it is assumed that the Proposed Development would comprise a wooden trident pole design. The average height of the trident poles is between 13 and 16 meters, up to 18 meters, with an average span of between 70 and 100 metres. The proposed wooden trident poles will support three conductors (wires) on three insulators positioned at the top of the pole. A typical design of the structure is presented in **Plate 2.1**.



Plate 2.1 – Typical wooden trident pole design

The final designation of support type is generally dependent on three main factors: altitude, weather and the topography of the route. The size of supports and span lengths will also vary depending on these factors, with supports being closer together at high altitudes to withstand the effects of greater exposure to high winds, ice and other weather events. Following identification of the Preferred Route for the Proposed Development, a detailed topographical survey will be carried out. This is required to identify the selection of the supports suitable for the OHL, the proposed positions and heights of each individual pole. Site investigations to examine the ground makeup and geology will also be carried out at proposed pole positions where required. These will inform the support foundation designs.

#### 2.3.1 Construction Activities

Construction activities are anticipated to consist of six phases, as follows:

- Alterations to the existing transmission and distribution networks;
- Enabling work (forestry clearance and establishment of temporary construction compound(s);
- Erection of support structures;
- Conductor stringing (including construction of temporary scaffolding);

Inspections and OHL commissioning; and

• Removal of temporary works and site reinstatement.

All construction activities will be undertaken in accordance with a Construction Environmental Management Plan (CEMP) which will define specific methods for environmental survey, monitoring and management throughout construction. A CEMP will be produced by the Principal Contractor and agreed with statutory stakeholders prior to the commencement of construction.

#### 2.3.2 Forestry Removal

Any woodland removal which may be required prior to the construction work will be identified and described after a proposed alignment has been identified. Any removal of sections of commercial forest would be undertaken in consultation with Scottish Forestry and affected landowners. After felling, any timber removed that is commercially viable would be sold and the remaining forest material would be dealt with in a way that delivers the best practicable environmental outcome

and is compliant with waste regulations. The methods of woodland removal and management of timber would be described in a Woodland Management Document in-line with The UK Forestry Standard<sup>2</sup> guidance, to be prepared as part of the application for consent under Section 37 of the Electricity Act 1989, as amended. The Proposed Development will also seek to adhere to Scottish Government's Control of Woodland Removal Policy<sup>3</sup>.

#### 2.3.3 Access during Construction

Vehicle access is required to each support structure location during construction to allow excavation and creation of foundations and erection of the support structures. Existing tracks would be used where possible. Preference will be given to lower impact access solutions including the use of low pressure tracked personnel vehicles and temporary track solutions in boggy / soft ground areas to reduce any damage to, and compaction of, the ground. These journeys would be kept to a minimum to minimise disruption to habitats along the route. However, temporary stone tracks are likely to be necessary in some areas depending on existing access conditions, terrain and altitude. A more detailed plan for access during construction will be prepared once a proposed alignment has been identified and the preferred support structure type selected.

Access requirements for the Proposed Development will be dependent upon the type of OHL supports chosen. Consideration of impacts will be undertaken at the alignment stage once the support type has been confirmed. However, permanent access to angle / tension pole and tower positions would be desirable for operational and management purposes and for storm control. A more detailed plan for access during construction will be prepared once a Proposed Alignment has been identified and the type of support structure has been selected.

#### 2.3.4 *Indicative Programme*

It is anticipated that construction of the Proposed Development would take place over an approximate 18-month period, following the granting of consents, although a detailed programming of works would be the responsibility of the Principal Contractor in agreement with SSEN Transmission. Construction is estimated to start in September 2025 and finish in April 2027.

<sup>&</sup>lt;sup>2</sup> The UK Forestry Standard 4th Edition (2017); The Governments' approach to sustainable forestry. [online]. Available at: https://www.gov.uk/government/publications/the-uk-forestry-standard (Accessed 14 June 2022)

<sup>&</sup>lt;sup>3</sup> Scottish Forestry. (2009). The Scottish Government's Policy on Control of Woodland Removal. Available at: https://forestry.gov.scot/publications/285-the-scottish-government-s-policy-on-control-of-woodland-removal/viewdocument/285 [Accessed 10<sup>th</sup> February 2023].

#### 3. CONSIDERATION OF ROUTE OPTIONS

#### 3.1 Introduction

The Consultation Document<sup>4</sup> sets out the approach to the consideration and appraisal of route options, In line with SSEN Transmission's Routeing Guidance<sup>5</sup>. The guidance sets out SSEN Transmission's approach to selecting a route for an OHL, a process which aims to balance environmental, engineering and economic considerations throughout the Route Options process.

In line with the principles outlined In the guidance document, the method of identifying a Preferred Route has involved the following four key tasks:

- Identification of the baseline situation;
- Identification of alternative route options;
- Environmental, technical and economic analysis of Route Options; and
- Identification of a Preferred Route.

#### 3.2 Identification of Preferred Routes

The Preferred Route has been selected on the basis that is considered to provide an optimum balance of environmental, technical and economic factors. The Preferred Route is shown in **Figure 3.1**.

During the alignment selection stage of the project, alignment options within the Preferred Route will be carefully considered to achieve an acceptable alignment which seeks to minimise environmental effects. Confirmation of the Preferred Alignment will be informed by further consultation exercises, and through detailed surveys which may identify any additional and/or currently unknown engineering, environmental or land use constraints. Should further site and desk-based analysis at the alignment selection stage identify a particular constraint, a further review of route or alignment options may be required prior to the identification of a Preferred Alignment.

 $<sup>^{4}</sup>$  SSEN Transmission (December 2022) Chleansaid Wind Farm Connection Consultation Document

 $<sup>^{5}</sup>$  SSEN Transmission (March 2018) Procedures for Routeing Overhead Lines of 132kV and above

### 4. THE CONSULTATION PRO/CESS

#### 4.1 Introduction

In accordance with the SSEN Transmission Routeing Guidance a process of consultation on the Preferred Route was implemented. This section Identifies the methods of consultation and the key dates when consultation took place.

#### 4.2 Methods of Consultation

The following methods were used to consult on the Preferred Route, as set out below.

#### 4.2.1 Consultation Document

The Chleansaid Wind Farm Connection Consultation Document (December 2022) was produced detailing the selection process for the Preferred Route, taking account of environmental, economic and technical factors. The Consultation Document was made available for download in December 2022 from https://www.ssen-transmission.co.uk/projects/project-map/chleansaid-wind-farm-connection/.

**Table 4.1** details the statutory and non-statutory stakeholders in receipt of the Consultation Document or otherwise informed of the website details:

**Table 4.1 List of Statutory and Non-Statutory Consultees** 

Statutory Consultees		
Historic Environmental Scotland (HES)	Scottish Forestry	
Scottish Environment Protection Agency (SEPA)	The Highland Council	
NatureScot		
Non-Statutory Consultees		
British Horse Society	Scottish Rights of Way and Access Society (ScotWays)	
BT Group Plc	Scottish Water	
Civil Aviation Authority - Airspace	Scottish Wildlife Trust	
Crown Estate Scotland	Scottish Wild Land Group (SWLG)	
Defence Infrastructure Organisation	Visit Scotland	
Fisheries Management Scotland (FMS)	BAA Aerodrome Safeguarding (Aberdeen)	
Fisheries - Local District Salmon Fisheries	Glasgow Airport	
Joint Radio Company	Highland and Islands Airports	
John Muir Trust	Highland Council Archaeology Service	
Mountaineering Scotland	Marine Scotland	
NATS Safeguarding	Transport Scotland	
Nuclear Safety Directorate (HSE)	Forestry and Land Scotland (FLS)	
RSPB Scotland	Coal Authority	

Landowners, residents and local communities were made aware, through various consultation promotion methods (see **Table 4.2**), of the Consultation Document which was made available via

the dedicated project website. Updates were issued via email to project website subscribers, local community councils and ward councillors.

Feedback on the Consultation Document was requested by 26<sup>th</sup> January 2023.

Stakeholders were invited to provide feedback through the following methods:

- A series of questions were asked within the Consultation Document requesting comments on specific aspects of the project as follows:
  - o Has the need for the Project been adequately explained?
  - o Has the approach taken to select the Preferred Route been adequately explained?
  - Are there any factors, or environmental features, that you consider may have been overlooked during the Preferred Route selection process?
  - Do you feel, on balance, that the Preferred Route selected is the most appropriate for further consideration at the alignment selection stage? Please provide an explanation of your answer.
  - If you don't agree to our Preferred Route which of the options would you consider the best option for SSEN Transmission to develop? Please provide an explanation of your answer.
- A feedback form was also provided on the project webpage allowing users to submit comments.

#### 4.2.2 Public Consultations

A face to face public consultation event will be held between 3pm to 7pm on 24th January 2023 at Lairg Community Centre, Main Street, Lairg IV27 4DD. The exhibition was advertised using several methods as shown in **Table 4.2**. A copy of the public notice is provided in **Appendix A**. The public consultation event at Lairg Community Centre was set up with exhibition boards, maps, interactive videos as illustrated in **Plate 4.1**.

Table 4.2 – Summary of Consultation Document

Method	Recipients
Mail drop – Postcard	217 properties and businesses
Email to Stakeholders to advise of consultation	MSP, MP, Councillors, Community Councils
Press Advert	n/a
Posters	Public noticeboard at Bridgend Stores, Lairg  Public noticeboard at Shin Fry / Spar in Lairg  Lairg Community Centre
Social Media	Lairg Community Centre Facebook page



Plate 4.1: Public Consultation Set Up

The public exhibitions provided a forum to share information about the project and the Preferred Route. Attendees were invited to take a summary information leaflet (see **Appendix B**) and to consider information presented on a series of exhibition boards. The exhibition boards detailed key information on the project and what SSEN Transmission were consulting on, these included maps, environmental and engineering information.

All members of the public were invited to complete a feedback form (see **Appendix C**).

Four members of the public attended the public consultation exhibition. A total of one completed feedback forms, plus one email containing feedback were received following the exhibition.

#### 5. STAKEHOLDER CONSULTATION RESPONSES

In developing the Chleansaid Wind Farm 132kV OHL Connection Project, the technical, environmental, economic and geographic constraints on the design and safe operation of the assets along with views expressed by stakeholders are considered. Gathering views from a variety of stakeholders is vital to developing and shaping a solution that balances different views of stakeholders. To ensure transparency throughout the consultation process it is vital that the opportunity is provided to share feedback received from stakeholders on the Proposed Development.

#### 5.1 Feedback forms

In response to this consultation, feedback has primarily been received via completed feedback forms. Some respondents also chose to voice queries and views via email, post or phone call.

One completed feedback form was received. Where emails were received which raised questions, these were responded to directly and comments raised are summarised as part of this document.

#### 5.2 Statutory and Non-Statutory Stakeholder Feedback

**Table 5.1** details the respondents and the dates on which responses were received from stakeholders in response to the Consultation Document. **Table 6.1** (Section 6) provides a summary of statutory and non-statutory stakeholder feedback and SSEN Transmission's response.

**Table 5.1 Statutory and Non-Statutory Consultee Respondents** 

Consultee	Date Response Received
Scottish Water	20/12/22 and 26/01/23
BT Group Plc	21/12/22
Fisheries Management Scotland (FMS)	22/12/22
Coal Authority	22/12/22
NatureScot	13/01/23
RSPB Scotland	18/01/23
Forestry and Land Scotland (FLS)	26/01/23 and 09/02/23
HES	26/01/23
ScotWays	01/02/23
SEPA	09/02/23

All consultation responses received during the consultation period have been collated and summarised into a consultation register. This register remains an active document and will be updated on receipt of further consultation comment.

Whilst recognising that this consultation was not part of a formal EIA screening or scoping procedure, the statutory and non-statutory consultees gave informative responses and identified where an option may necessitate specialist survey or would require careful design or mitigation to avoid sensitive features.

Not every Route Option was given a response with consultees focussing on the Preferred Route and Route Options where they could anticipate a potential issue. Refer to **Table 6.1** for stakeholder feedback and SSEN Transmission's response.

#### 6. PROJECT RESPONSES TO CONSULTATIONS

#### 6.1 Overview

This section of the report provides the responses from SSEN Transmission to the questions and themes emerging from the public consultation and the responses provided by statutory and non-statutory stakeholders.

#### 6.2 Consultation Responses

**Table 6.1** provides a summary of the responses to the Consultation Document provided by statutory and non-statutory consultees. **Table 6.2** provides a summary of the Feedback Forms response themes. These are presented along with a reply from SSEN Transmission, including how the project will be developed to take account of the comments provided, as it moves forward into the next phase of development.

Through the consultation process a number of comments have been raised which require clarification or further assessment. These points include additional detail on the potential alignment, recommendations for continued consultation with stakeholders, and the importance of various surveys and assessments for protection of environmental aspects as the project evolves. This process will remain inclusive, seeking further consultation where appropriate.

**Table 6.1 - Statutory and Non-Statutory Consultee Respondents** 

Consultee	Summary of Feedback	Response by SSEN Transmission
The Coal Authority	Confirm that the site lies outside the coalfield, therefore the Coal Authority have no specific comments to make.	Noted.
Fisheries Management Scotland (FMS)	FMS are only able to provide a general response with regard to the potential risk of such developments to fish, their habitats and any dependent fisheries. FMS will inform the relevant local District Salmon Fishery Board (DSFB)/Trust (the Kyle of Sutherland DSFB) to the Project. It is important that the proposals are conducted in consultation with the Kyle of Sutherland DSFB. The response is copied to the Kyle of Sutherland DSFB.	Noted. FMS and the Kyle of Sutherland DSFB shall be included in further consultation as part of the Proposed Development. SSEN Transmission will take note of the advice provided as the Proposed Development progresses.
	FMS provided advice (in conjunction with Marine Scotland) for DSFBs and Trusts in dealing with planning applications. Recommend these considered for the project, these Include the 'Advice On Terrestrial Windfarms' and 'DSFB & Trust Contact Details'.	
BT Group Plc	The Project should not cause interference to BT's current and presently planned radio network. Once precise locations of poles are known, please inform BT so this can be reviewed.	Noted. BT Group Plc to be included in further consultation as part of the Proposed Development.
Scottish Water	20th December 2022	Noted, shapefiles provided and summary of potential felling
	Please provide the shapefiles of the preferred route, to allow Scottish Water to identify DWPA's and Scottish Water Assets accurately. Please also provide an indication of any sensitive areas where felling is to take place	provided.  The fact the Proposed Development falls partly within a drinking water catchment where a Scottish Water Abstraction
	23 <sup>rd</sup> January 2023	is located is noted. The presence of this Scottish Water
	Drinking Water Protected Areas	Abstraction is not considered to alter the chosen Preferred Route. SSEN Transmission will ensure site personnel are made
Scottish Water abstraction as Drinking Water Protects Preferred Route only just of therefore should be of low Scottish Water lists details wider drinking water catch information is available or	The proposed activity falls partly within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the WFD. The	aware of this during site inductions. Further surveys will be undertaken to identify a preferred alignment(s) that avoid and/or minimise potential impacts, where practicable.
	Preferred Route only just encroaches within the catchment boundary and therefore should be of low risk to affecting water quality in the catchment.	SSEN Transmission will consult with the Asset Plan Provider
	Scottish Water lists details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area (further information is available on SW's website). We welcome receipt of this notification about the proposed activity within a drinking water catchment where a Scottish	plans available online to confirm the presence of Sottish Water Assets In the area. Further consideration to Interactions with access roads and pipe crossings will be given as the project progresses through the alignment stage.

Consultee	Summary of Feedback	Response by SSEN Transmission
	Water abstraction is located. Site personnel should be made aware of this during site inductions and SW are to be notified of site works prior to their commencement.	SSEN Transmission also acknowledge Scottish Water's policies and standards in relation to dealing with asset conflicts. These comments will be considered at the alignment stage.
	Scottish Water Assets	
	There may be Scottish Water assets in the area. This should be confirmed through obtaining plans from our Asset Plan Providers. Details of our Asset Plan Providers are highlighted in the SW list of precautions for assets online. All Scottish Water assets potentially affected by the activity should be identified, with particular consideration being given to access roads and pipe crossings. It should be noted that the proposals will be required to comply with Sewers for Scotland and Water for Scotland 4th Editions 2018, including provision of appropriate clearance distances from Scottish Water assets.	
NatureScot	NatureScot cannot determine a substantial difference between Option 1 and Option 2 in the absence of a more detailed alignment design. Agree that Option 3 is the least favourable, albeit only marginally so and therefore cannot rule out Option 3 at this stage. Further consideration will be given during the alignment selection stage.  Natural Heritage  Designated sites  Agree that Route Option 3 is likely to be the least favourable option due to its proximity to Strath Carnaig & Strath Fleet Moors SPA and the potential proximity to Lairg and Strath Brora Lochs SPA.  Habitats  All Route Options have the potential to impact peatland of national importance. NatureScot recommend that specific peat surveys should be carried out in line with Scottish Government Guidance and their own guidance. Confirm areas of both native woodland and peatland present within the 1km wide corridors of all Route Options. As outlined in the consultation report, it will need to be demonstrated that any significant effects on these areas can be substantially	The potential for impacts upon natural heritage assets and upon the Starth Carnaig & Strath Fleet Moors SPA and Lairg and Strath Brora Lochs SPA (specifically Route Option 3) were considered within the Consultation Document and will continue to be considered through future design stages and assessment work. Effects would be minimised through considerate construction design and the implementation mitigation to protect the marine environment through a suitable Construction Environmental Management Plan (CEMP).  The Consultation Document acknowledges that the Preferred Route pass through habitat supporting notable bird species. SSEN Transmission have committed to undertaking one year of ornithology surveys between March 2023 and February 2024. SSEN Transmission will consult with NatureScot's recently updated guidance In relation to bird species disturbance distances.
	overcome by siting, design or other mitigation measures.  Ornithology	In addition to ornithology surveys, It Is currently proposed that the following ecological surveys will Inform the alignment stage: UK Habitat Classification (proposed to be up to 325 m from alignment options), protected habitat suitability surveys,

Consultee	Summary of Feedback	Response by SSEN Transmission
	Agree with the assessment that all Route Options have been assigned an Amber RAG rating as they all pass through habitat supporting notable bird species. Advise that the assessment should include both during the breeding season but also out-with the breeding season for species potentially resident all year round. Recommend their 'disturbance distance for protected bird species' guidance is taken into consideration when assessing impacts to birds along the route and when developing appropriate mitigation measures (where required). Hydrology, Geology and Hydrogeology  Agree with the assessment that all Route Options be assigned an equal Amber RAG rating as further alignment information is required before the relative impacts can be appraised and assessed.  Protected Species  Welcome the consideration for protected species licences as part of any development.  Landscape and Visual (in relation to Wild Land Areas only)  We agree that visibility of both Route Options 1 and 2 from Reay - Cassley WLA would be perceived in the context of existing infrastructure and backdropped by forestry and topography. Route Option 3 would be less likely to be visible from this WLA. It is not obvious if an OHL perpendicular (as in Route Options 1 and 2) or parallel to the WLA (largely Route Option 3) will have a greater visual impact from the WLA.  We do not feel it is possible at this stage to determine the relative differences of impact between the three Route Options without alignment information. This will include the presence of any strongly linear elements of the OHL or the adjacent managed vegetation.	and a landscape walkover survey. The results of these surveys will be provided within the Alignment reports and subsequent EIA. Protected species licences will be sought if necessary. In line with the SSEN's Routeing Guidance the presence and potential impact upon peat will continue to be considered as part of the alignment stage. SSEN Transmission acknowledge the need to carry out peat probing surveys to inform the alignment stage. A peat probing survey will be carried on tower locations to inform design and layout. Where avoidance is not possible restoration measures will be identified and discussed with NatureScot.  Impacts to the Real-Cassley WLA will be further considered in the identification and subsequent assessment of alignment options.
RSPB Scotland	Baseline Conditions  We are generally content with the Preferred Route (Option 2), in absence of any survey data, although note that the river valley supports notable species including breeding hen harrier and lekking black grouse. There are also existing OHLs along the route of the Preferred Route.  The Consultation Document does not explain whether an option to combine the existing lines and the proposed lines is possible or whether this has been	SSEN Transmission note RSPB Scotland's comments on the Preferred Route. It is currently proposed that the following ecological and ornithological surveys will inform the alignment stage: UK Habitat Classification (proposed to be up to 325 m from alignment options), a full suite of ornithology surveys, protected species habitat suitability surveys and protected species surveys where required. The results of these surveys

Consultee	Summary of Feedback	Response by SSEN Transmission
	considered. Such an approach would avoid having two adjacent OHLs along the route and would be likely to require fewer disruptive works impacting on habitats	will be provided within the Alignment reports and subsequent EIA. Protected species licences will be sought if necessary.
	and species.  Species  Recommend undertaking one year of field surveys minimum to provide up-to-date information on bird distribution and activity. We recommend that vantage point, breeding bird, raptor and species-specific wood sandpiper and black grouse surveys are required. We recommend the addition of other notable Schedule 1 bird species such as merlin, crossbill and red-throated diver, as well as amberlisted snipe and redshank are also included in surveys  Habitats  Peat depth and habitat surveys should be undertaken along the Preferred Route in order to inform the final alignment deviation choices, although we understand that peat is extensive across the area and will be difficult to completely avoid. Horizontal Directional Drilling (HDD) or undergrounding should not be ruled out in some areas if field surveys reveal a high potential bird collision risk or presence of sensitive bog habitats.  Cumulative Impact	The Consultation Document states that further environmental and engineering studies will be undertaken at the alignment stage which will explore the potential requirements for alternative technology options. Until these are undertaken, the requirements for other technology options are unknown. In line with SSEN's Routeing Guidance, the presence and potential impact upon peat will continue to be considered as part of the alignment stage. SSEN Transmission acknowledge the need to carry out peat probing surveys to inform the alignment stage. A peat probing survey will be carried out to inform design and layout. Where avoidance is not possible, restoration measures will be identified and discussed with RSPB Scotland.  SSEN Transmission recognise the importance of establishing a holistic approach to assessment. The potential cumulative impact is considered in the development and appraisal during
	A cumulative impact assessment will be especially important for this project due to the large number of OHL and wind farm projects in the area.  Other issues  We believe that development should leave nature in a better state than before it took place and welcome NPF4's commitment to deliver positive effects for biodiversity through development. A detailed Habitat Management Plan (HMP) should be prepared and submitted as part of the proposals, and we recommend peatland restoration is considered in line with the adjacent FLS Land Management Plan. We also encourage future monitoring of collisions by SSEN.	routeing as well as part of the EIA.  Cumulative impacts will be taken into consideration with other environmental, engineering and economic factors to select a proposed alignment which is economically viable, technically feasible, minimises impacts on important resources or features of the environment and reduces disturbance to those living in it, working in it, visiting it or using it for recreational purposes.  SSEN Transmission is committed to biodiversity net gain and will continue to monitor the impact on the development and its requirement for achieving net gain as it progresses. SSEN Transmission will work with RSPB Scotland and other stakeholders to develop plans which maximise biodiversity as a result of the Proposed Development.

Consultee	Summary of Feedback	Response by SSEN Transmission
Forestry and Land Scotland (FLS)	23 <sup>rd</sup> January 2023  FLS unable to formally respond to consultation however highlight they will likely require more information and may only be willing to work with SSEN on a wholly	SSEN Transmission acknowledge that discussion with FLS is required to identify potential conflicts and opportunities between the project and FLS ongoing activities.
	different route.  9th February 2023  All of the three route options being considered will have an impact on Scotland's National Forest Land (SNFL), majority of land within corridor is managed by FLS. FLS does not want any additional burdens on the land it manages and will object to and resist the imposition of such burdens and constraints unless it can be shown they are absolutely essential and unavoidable.	SSEN Transmission note the absence on consultation or discussion in relation to Stage 1. Stage 1 refers to the corridor selection stage of the process and is dependent upon the scale of the likely transmission infrastructure. Due to the potential distance between the two connection points (approximately 10km) it is considered that the determination of separate large scale corridors (generally 5km in width) is not suitable as a starting point for the project.
	<ul> <li>FLS has a number of concerns relating to the consultation exercise:</li> <li>There does not appear to have been any consultation or discussion on Stage 1 (RCD summarises Stage 2: Route Selection)</li> <li>The consultation document references 'SSEN Transmission Routeing</li> </ul>	The Route Options take into consideration the existing and proposed infrastructure in the area and have been developed in line with SSEN Routeing Guidance which builds upon the Holford Rules in relation the routeing OHL's.
	<ul> <li>Guidance' which is not publicly available.</li> <li>It appears that at the route option selection stage (Stage 1) for the proposed OHPL the cable route is considered in isolation and there is no strategic overview of the cumulative impact of the proposed line on the existing and</li> </ul>	The appraisal of Route Options using generic text where available and does not rely on specifics within SSEN Transmission Routeing Guidance.  The use of alternative technological solutions has been
	<ul> <li>proposed infrastructure in the area.</li> <li>The route selection process disregards and then completely ignores the possibility of undergrounding all or some of the cable on the assumption it is too difficult to do.</li> <li>The consultation appears to work on the assumption that this export cable</li> </ul>	considered by SSEN Transmission, including the possibility of an underground cable. As documented in Section 2 of the Consultation Document, an OHL was considered the most appropriate solution due to the associated challenges with underground cables in remote areas. This includes terrain,
	needs to use the same technology along its whole length – this appears excessively restrictive.  FLS also has a number observations on the content of the consultation report itself:	access and the presence of watercourses and associated flood zones, potential undesignated assets and peat.  At this stage only major crossings are considered however the proximity to other existing and proposed infrastructure will be
	FLS has substantial data sets on environmental and historical features within SNFL but the consultation report does not mention this information source and so it is assumed it was not requested or used. The data held by FLS can generally be made available.	considered during the alignment stage. SSEN Transmission would be happy to provide FLS with the shapefiles for all three considered Route Options.  SSEN Transmission would welcome receipt of datasets from FLS on environmental and historical features within SNFL and

Consultee	Summary of Feedback	Response by SSEN Transmission
	<ul> <li>A two day site walkover in November is unlikely to facilitate observing much of the biodiversity that may be within the route corridor.</li> </ul>	would take this into consideration during assessment of alignment options. The purpose of the walkover in November was to provide a general overview of the Route Options to influence the comparative assessment, and not a detailed survey of biodiversity within the area.  SSEN Transmission recognise the importance of establishing a holistic approach to assessment. The potential cumulative impact is considered in the development and appraisal during routeing as well as part of the EIA.  SSEN Transmission acknowledge that FLS consider that Route Option 2 is the Preferred Route and note FLS' concern for further consideration during the alignment stage. SSEN Transmission will continue to explore alternative technological options as part of the alignment stage.
	<ul> <li>The document appears to objectively assess the impact of the potential OHPL on the identified features and appears to make a rational comparison between the route options and the preferred option is a logical choice.</li> </ul>	
	• The document makes no reference to a lattice telecoms tower (grid ref: NC 6220 1426) or the undergrounded BT fibre optic cable that services it.	
	The document does not appear to consider the existing 11kV OHPL that runs parallel to the Dalnessie estate access track.	
	<ul> <li>The document does not appear to mention that the Dalnessie estate access track will be the access road for the Chleansaid Wind Farm (if it gets planning consent) that the export cable is the grid connection for.</li> </ul>	
	FLS objects to the new OHPL crossing the SNFL as the cumulative effects when it is combined with the existing infrastructure in the area unreasonably constrains FLS ability to sustainable manage SNFL.	
	Of the 3 routes considered FLS acknowledges that the identified preferred route is probably the best route of the route corridors considered. If this route is to be subject to a more detailed alignment study it is suggested consideration is given to potentially underground cable where it crosses SNFL, ensuring the new cable is close and parallel to the existing 11kV OHPL that serves Dalnessie Estate, and ensuring the new cable is on the west side of the existing 132kV export cable along the A836.	
	FLS request the GIS shape files for all three of the route options.	
Historic Environment Scotland (HES)	We note that the proposed OHL passes close to three scheduled monuments. It is likely that Route Option 2 (as preferred by SSEN) would have an adverse impact on the setting of several scheduled monuments. However, mitigation through design should be able to lessen impacts to an acceptable level.	Further consultation with HES will be undertaken at the alignment stage to seek to find an acceptable alignment that minimises potential effects on cultural heritage sites and assets.
	For Route Option 1 the report identifies that the proposed OHL would need to be routed along the northern side of the corridor to minimise setting impacts on Loch Beag na Furalachd, cairn and shielings 1175 m ESE of SW end (SM5081) and Loch Beag na Fuaralachd, shielings 1000 m SW of SW end of (SM5159). This	SSEN Transmission acknowledge the potential for impacts on SM5081, SM5159, SM4563, and SM5300 and these assets have been considered in the route options appraisal. Further environmental studies will be undertaken at the alignment stage which will consider the potential for impacts on cultural

Consultee	Summary of Feedback	Response by SSEN Transmission
	option has been given an amber rating for cultural heritage, with which we concur.  For Route Option 2 the report identifies a similar pinch point in the vicinity of Dalnessie, Settlement N of Feith Osdail (SM4563) and Cnoc a'Bhreac-leathaid, sheilings and cairnfield 700m NNE of (SM5300), as well as the monuments noted for Route Option 1, and that the proposed OHL could potentially be routed close to the Feith Osdail burn so as to sit below each monument. This option has been given a red rating for cultural heritage, with which we concur.  For Route Option 3 the report also identifies a number of pinch points related to the likely proximity to eleven scheduled monuments. This option has been given a red rating for cultural heritage, with which we concur.  We agree with the outcome of the cultural heritage section of the report that Route Option 1 is likely to entail fewest impacts on scheduled monuments and their settings, and that Route Option 3 has the potential to have the greatest impacts on scheduled monuments and their settings. We are content that Route Option 2 is taken forward as the Preferred Route, subject to mitigation through design to ensure that significant adverse impacts on scheduled monuments and their settings are not encountered.  HES' response also provided information on the characteristic features of several specific assets In proximity to the route options.	heritage sites and assets. It is considered that an acceptable alignment that minimises potential effects on cultural heritage sites and assets within the Preferred Route option can be found. SSEN Transmission will continue to engage with Historic Environment Scotland through subsequent project stage, including discussion on potential mitigation.  The use of visualisations to demonstrate the impact of a replacement OHL will be considered as part of the Environmental Impact Assessment forming part of the Section 37 Application.
ScotWays	The information contained in the baseline conditions and visual receptors within the Consultation Document reference core paths, but note no other recreational routes, including rights of way, have been considered.  Highlight Right of Way HS29 as recorded in the National Catalogue of Rights of Way (CROW) crosses the Preferred Route. Also highlighted that Heritage Path 'Strath Tirry to Badenloch Tracks' (HP308) and Scottish Hill Tracks 'Lairg to Crask Inn by Loch Choire' (HT325) also cross the Preferred Route, and enclosed maps to show this. Included planning guidance notes and Information related to CROW as part of the response.	The information provided by ScotWays, including the specified National Catalogue of Rights of Way are noted and are not considered to alter the selection of the Preferred Route. This information will be considered further at the alignment stage. An Access Management Plan will be prepared to accompany the CEMP where applicable. This plan will be implemented during the construction phase, where works are in the vicinity of promoted routes.
SEPA	There are a number of existing and proposed tracks in this area, the layout of the Proposed Development should utilise these as much as possible. All new tracks should be clearly Indicated whether there are permanent or temporary. A suitable buffer should be In place for works near main rivers. Wetlands and areas of	SEPA's comments on the preferred route, access tracks water crossings, wetlands and peatlands are noted. SSEN Transmission will undertake consultation with SEPA on any potential environmental licences and pollution management

Consultee	Summary of Feedback	Response by SSEN Transmission
	deeper peat should be avoided where possible and measures for mitigation, compensation, and enhancement Included.  SEPA's response also makes reference to their Standard Windfarm Scoping Guidance which sets out the issues to be considered during windfarm type developments.	as part of the alignment stage. The design of the Project will seek to use existing access tracks, wherever possible. Where temporary access tracks are required, the CEMP will include measures, including SSEN Transmission's GEMPs, to ensure that construction materials are reused wherever possible.

**Table 6.2 - Feedback Form Responses** 

Summary of Feedback	Response by SSEN Transmission
Concern raised around the potential for a negative visual impact on the horizon skyline view from West Langwell.	Comments are acknowledged. The OHL is unlikely to be visible from West Langwell due to a combination of the distance from the route options considered, approximately 7 km at its closest point, and the intervening topography which is generally at or higher than the area with the route options. At this stage, only Route Option 3 is considered to be visible from West Langwell and any potentially impacts are not likely to be significant
Feedback form in support of the OHL suggesting that Route Option 3 would be preferable, and Route Option 1 'heads towards an area of rare mussels, salmon conservation and rewilding / replanting area'.	Comments are acknowledged. Neither Route Option 1 or 3 were considered the most preferable following a range of environmental, technical and engineering appraisal. Route Option 2 was put forward as the Preferred Route.

#### 7. CONCLUSIONS AND NEXT STEPS

#### 7.1 Summary

This Report on Consultation documents the consultation process which has been undertaken for the project between December 2022 and February 2023. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the Preferred Route.

This report describes the key responses received and provides detail on the actions proposed in response to the issues raised. The consultation on the route selection process has been successful in obtaining a large amount of feedback from both statutory and non-statutory consultees.

The responses provided agree with the discounting of Route Option 3 to avoid the sensitive ecological areas of Strath Carnaig and Strath Fleet Moors SSSI and SPA, avoid large areas of native woodland (as identified on the Native Woodland of Scotland Survey) and the numerous Scheduled Monuments present within this Route Option. Most responses preferred included agreement on the Preferred Route. The responses provided highlight the requirement to balance different sensitivities and receptors in selection of the Preferred Route and to consider as part of the alignment studies; for example HES acknowledge that although Route Option 2 is preferred on cultural heritage grounds, further works as part of the alignment studies are required to inform mitigation to avoid the potential for significant impacts on a number of Scheduled Monuments.

A number of stakeholder responses provided useful information or references to further material to be considered. Where additional information provided had the potential to impact upon the selection of a Preferred Route this information has been reviewed and factored into the selection of the Proposed Route.

Several responses referred to concerns regarding specific receptors and their comments will be incorporated in the further assessment work to be undertaken. The points raised include the need for additional consideration of the potential impacts upon specific receptors or areas, the need for further environmental information, recommendations for continued consultation with stakeholders, and the importance of various surveys and assessments for protection of environmental aspects as the project evolves.

To address these points, the following actions are being undertaken:

- Alignment options will be developed and will consider appropriate technological options along the Preferred Route, as well as construction access solutions. The results of these studies will be reported at Alignment Selection (Stage 3);
- Further environmental survey and assessment work will be undertaken in parallel with the
  engineering studies to enable a collaborative approach in seeking to identify a preferred
  alignment through this sensitive landscape and environment. In particular, this will involve
  further survey effort and advice relating to landscape and visual, ecology, ornithology,
  hydrology, peat, soils, forestry and cultural heritage matters. The results of these studies will
  be reported at Alignment Selection; and
- Further consultation will be organised with key statutory and non-statutory consultees, local
  councillors and local communities to provide updates on the project during the alignment
  stage. This will include addressing comments relating to the provision of information during the
  consultation process. Formal consultation will be organised on completion of the alignment
  studies to enable comments from stakeholders to be sought on the preferred alignment
  identified.

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

The consultation process has confirmed that Route Option 2 should be taken forward as the Proposed Route, within which further study will seek to identify alignment options. It is recognised that the Proposed Route runs through a sensitive environment with challenging terrain. However, the Proposed Route has been selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors, and will be taken forward to the alignment stage of this project.

Detailed analysis of potential alignment options within the Proposed Route and consultation feedback and will focus on finding an alignment that avoids or minimises potential environmental impacts referred to in **Table 6.1** above.

#### 7.2 Next Steps

The project will now be taken into Stage 3 (Alignment Selection), commencing with identification of alignment options within the Proposed Route. These will be informed by this and further consultation exercises, and through detailed surveys, which may identify any additional and/or currently unknown engineering, environmental or land use constraints.

Members of the public and other interested stakeholders will be invited to participate in another consultation on the Preferred Alignment in Spring 2023, before the alignment is finalised for the purpose of seeking the necessary consents and permissions under the Electricity Act 1989. The anticipated programme is as follows:

Spring/ Summer 2023 - Alignment selection to select a preferred alignment and structure positions.

Spring/ Summer 2023 - Consultation on the Preferred Alignment.

Summer 2023 - Request for EIA Screening Opinion.

Autumn/ Winter 2023 - Finalise design to make applications for necessary consents and permissions.

Winter 2023 and Spring 2024 - Section 37 application.

We will continue to engage with the local community, Community Councils, elected representatives, statutory and non-statutory stakeholders through the project.

# **APPENDIX A: Figures**



