

# **Chleansaid Wind Farm 132 kV OHL Connection Environmental Appraisal (EA) Report**

## **Appendix 4.2: Alignment Report on Consultation November 2024**



# **Report on Consultation - Alignment Selection**

## **Chleansaid Wind Farm Connection**

**Date: July 2023**

**REF: 70099990-ALIGNMENT-RPTCONS-001**



Rev	Prepared By	Checked By	Approved By	Date of Issue
01	SS/CE	JB	MR	28/06/23
02	CE	JB	MR	25/07/23
03				

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## 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)	Environmental Impact Assessment. A formal process codified by EU directive 2011/92/EU, and subsequently amended by Directive 2014/52/EU. The national regulations are set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. The EIA process is set out in Regulation 4(1) of the regulations and includes the preparation of an EIA Report by the developer to systematically identify, predict, assess and report on the likely significant environmental impacts of a proposed project or development.
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 1 km width (although this may be narrower/wider in specific locations in response to identified pinch points / constraints), which provides a continuous connection between defined connection points.
Route (preferred)	A route for the overhead line taken forward to stakeholder consultation following a comparative appraisal of Route Options.
Route (proposed)	A route taken forward following stakeholder consultation to the alignment selection stage of the overhead line routeing process.

Term	Definition
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 Hydro Electric Transmission plc, operating and known as 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 Alignment identified for the proposed Chleainsaid Wind Farm 132 kV Overhead Line (OHL) Connection project, between the windfarm 132 kV Substation to Dalchork Substation.

A Consultation Document was published in May 2023 which sought comments on the proposals, the approach to route selection, the analysis of route options and the identification of a Proposed Alignment.

**A face-to-face public consultation event** was held between 3pm to 7pm on 8<sup>th</sup> June 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 Chleainsaid 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 Alignment and details the actions that will be taken as the proposed Chleainsaid Wind Farm 132kV OHL Connection project progresses through to the consenting stage.

## EXECUTIVE SUMMARY

Scottish and Southern Electricity Networks Transmission (hereafter referred to as 'SSEN Transmission'), operating under licence held by Scottish Hydro Electric Transmission plc are proposing to construct Chleainsaid Wind Farm 132 kV overhead line (OHL) Connection project (the 'Proposed Development'). The Proposed Development will be supported on wooden pole tridents and will be approximately 10.5 km in length running from Chleainsaid Windfarm (proposed under section 36 of the Electricity Act 1989) substation to Dalchork Substation.

SSEN Transmission is following a staged approach to routeing: Route Selection, Alignment Selection and then the consenting process. The Route Selection stage was completed in March 2023, with a Proposed Route for the OHL selected, based on earlier studies and consultation. The Proposed Route largely followed the Feith Osdail valley from west to east before heading south along the western extent of Dalchork Wood towards its connection point at Dalchork Substation.

Alignment Options were identified within the Proposed Route which were then assessed against each other on environmental, engineering and economic considerations to identify a Preferred Alignment taken forward to consultation. An Alignment Consultation Document was published in May 2023, describing the alignment selection process and selection of the Preferred Alignment for the Proposed Development.

This Report on Consultation documents the consultation process which has been undertaken for the project between May and June 2023. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents to invite feedback on the rationale for and approach to, the selection of the Preferred Alignment. This report describes the key responses received and provides detail on the actions proposed in response to the issues raised. All comments received in response to the Consultation Document (May 2023) informed further consideration of the Preferred Alignment, and the selection of a Proposed Alignment.

A face-to-face public consultation event held between 3pm to 7pm on 8<sup>th</sup> June 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 Chleainsaid 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 Alignment and details the actions that will be taken as the proposed Chleainsaid Wind Farm 132kV OHL Connection project progresses through to the Environmental Impact Assessment (EIA) and consenting stage.



## **1. INTRODUCTION**

### **1.1 Purpose of Document**

The Report on Consultation documents the consultation process with all interest parties on the Preferred Alignment identified for the construction of the Chleansaid Wind Farm 132 kV overhead line (OHL) Connection project (the 'Proposed Development'). The Proposed Development will be supported on wooden pole tridents and will be approximately 10.5 km in length running between 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 Alignment<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 is comprised of five sections as follows:

- 1: Introduction – setting out the purpose of the Report on Consultation;
- 2: Project Overview – describes the need for the proposals, the proposed technology solution and the typical construction methods;
- 3: Consideration of Alignment Options – sets out the Alignment selection process and methodology that has been applied to date to derive a Preferred Alignment;
- 4: The Consultation Process – describes the framework for consultation and methods which have been employed;
- 5: Stakeholder Consultation Responses - 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;
- 6: Project Responses to Consultations - describes how the comments and issues raised by Statutory and Non-Statutory stakeholders during consultation will be addressed; and
- 7: Conclusions and Next Steps – provides a summary of the conclusions reached and actions going forward.

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<sup>1</sup> Identified within the Chleansaid Wind Farm Connection Consultation Document (May 2023), 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 Chleainsaid 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 2.1**).

### 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 Alignment Options explored were OHL Alignment and the Alignment 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 Alignment for OHL has been identified and further environmental and engineering studies are undertaken, 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 poles, between the Chleainsaid 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 metres (m), up to 18 m, with an average span of between 70 and 100 m. 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 selection of the supports suitable for the OHL are being considered separately to the OHL routing process. The final designation of support type is generally dependent on three main factors: altitude, weather and the topography of the alignment. 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 Alignment 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

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<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>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].

along the alignment. However, temporary stone tracks are likely to be necessary in some areas depending on existing access conditions, terrain and altitude.

Access requirements for the Proposed Development will be dependent upon the type of OHL supports chosen. Consideration of impacts will be undertaken 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 to support the Section 37 application, however it is currently anticipated that permanent access tracks will be limited due to the presence of existing forestry tracks and Dalnessie Estate (and Chleainsaid Wind Farm) access track.

#### **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. Every effort would be made to minimise disturbance to landowners and local residents during construction by providing regular updates on works and restrictions via the site manager, community liaison manager and corporate affairs team.

### 3. CONSIDERATION OF ALIGNMENT OPTIONS

#### 3.1 Introduction

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

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

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

#### 3.2 Identification of Preferred Alignment

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

During the alignment selection stage of the project, Alignment Options within the Proposed Route have been carefully considered to achieve an acceptable alignment which seeks to minimise environmental effects. Confirmation of the Preferred Alignment has been informed by the consultation exercises summarised within this report, and through detailed surveys which have identified any additional and/or currently unknown engineering, environmental or land use constraints. Should any comments/concerns received from the Statutory and Non-Statutory Consultees, further review of Alignment Options may be required prior to the EIA and consenting stage.

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<sup>4</sup> SSEN Transmission (May 2023) Chleasaid Alignment Consultation Document

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

## 4. THE CONSULTATION PROCESS

### 4.1 Introduction

In accordance with the SSEN Transmission Routeing Guidance<sup>5</sup> a process of consultation on the Preferred Alignment 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 Alignment, as set out below.

#### 4.2.1 Consultation Document

The Chleainsaid Alignment Consultation Document (May 2023) was produced detailing the selection process for the Preferred Alignment, taking account of environmental, economic and technical factors. The Consultation Document was made available for download in June 2023 from <https://www.ssen-transmission.co.uk/projects/project-map/chleainsaid-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**

<b>Statutory Consultees</b>	
Historic Environmental Scotland (HES)	Scottish Forestry
Scottish Environment Protection Agency (SEPA)	The Highland Council
NatureScot	
<b>Non-Statutory Consultees</b>	
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 29<sup>th</sup> June 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:
  - Has the need for the Project been adequately explained?
  - Has the approach taken to select the Preferred Alignment been adequately explained?
  - Are there any factors, or environmental features, that you consider may have been overlooked during the Preferred Alignment selection process?
  - Do you feel, on balance, that the Preferred Alignment selected is the most appropriate for further stages? Please provide an explanation of your answer.
  - If you don't agree to our Preferred Alignment 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 held on between 3pm to 7pm on 08<sup>th</sup> June 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**.

**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	SSEN Transmissions Twitter page (@SSETransmission)

The public exhibitions provided a forum to share information about the project and the Preferred Alignment. 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**).

## 5. STAKEHOLDER CONSULTATION RESPONSES

In developing the Chleamsaid 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 in 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, no completed feedback forms were received.

### 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	23/05/23
RSPB Scotland	24/05/23
BT Group Plc	25/05/23
John Muir Trust	30/05/23
SEPA	31/05/23
NatureScot	06/06/23
JRC Windfarm Coordination	08/06/23
Coal Authority	15/06/23
Scottish Forestry	16/06/23
Defence Infrastructure Organisation (DIO)	04/07/23
Forestry and Land Scotland (FLS)	05/07/23

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 required to avoid sensitive features.

Not every Alignment Option was given a response with consultees focussing on the Preferred Alignment and Alignment 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. 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**

<b>Consultee</b>	<b>Summary of Feedback</b>	<b>Response by SSEN Transmission</b>
The Coal Authority	Confirm that the site lies outside the coalfield, therefore the Coal Authority have no specific comments to make.	Noted.
BT Group Plc	The Project should not cause interference to BT's current and presently planned radio network. Once grid-references of the structures of height are confirmed, 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	<p><b>Drinking Water Protected Areas</b></p> <p>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. Loch Beannach supplies Savalbeg Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected.</p> <p>Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. We welcome receipt of this notification about the proposed activity within a drinking water catchment where a Scottish Water abstraction is located.</p> <p>The fact that this area is located within a drinking water catchment should be noted in documentation. Site personnel should be made aware of this during site inductions and Scottish Water are to be notified of site works prior to their commencement.</p> <p><b>Scottish Water Assets</b></p> <p>There are Scottish Water assets in the area, there is a 6" uPVC raw water main and a 90mm HDPE potable water main within the red line boundary. This should be confirmed however through obtaining plans from our Asset Plan Providers. Details of our Asset Plan Providers are included in the SW list of precautions for assets online.</p> <p>All Scottish Water assets potentially affected by the activity should be identified, with particular consideration being given to access roads and pipe crossings. If necessary, local Scottish Water personnel may be able to visit the site to offer advice. All of Scottish Water's processes, standards and policies in relation to dealing with asset conflicts must be complied with.</p>	<p>Noted, shapefiles provided and summary of potential felling provided.</p> <p>The fact the Proposed Development falls partly within a drinking water catchment where a Scottish Water Abstraction is located is noted.</p> <p>SSEN Transmission will consult with the Asset Plan Provider plans available online to confirm the presence of Scottish Water Assets in the area. Further consideration to Interactions with access roads and pipe crossings will be given as the project progresses to the consenting stage.</p> <p>SSEN Transmission also acknowledge Scottish Water's policies and standards in relation to dealing with asset conflicts. These comments will be considered as the project progresses to the consenting stage.</p>

Consultee	Summary of Feedback	Response by SSEN Transmission
	All detailed design proposals relating to the protection of Scottish Water's assets should be submitted to the HAUC for review and written acceptance. Works should not take place on site without prior written acceptance by Scottish Water.	
NatureScot	<p>NatureScot broadly agree with the assessment on these criteria but have raised some points requiring clarification and more information.</p> <p><b>Natural Heritage</b></p> <p><i>Designated sites</i></p> <p>Lairg and Strath Brora Lochs Special Protection Area (SPA) is protected for Black-throated Diver (<i>Gavia arctica</i>). The maximum effective disturbance distance for Black-throated Diver is 1 km. All Alignment Options are more than 1 km from the SPA. The SPA is also separated and shielded from the proposed routes by extant mature forestry. We therefore do not foresee any likely significant effect of disturbance during the construction phase. We therefore agree with the assessment of options 1A and 1B. However, amber rating for Option 1C has to be clearly explained.</p> <p><i>Habitats</i></p> <p>As identified in the consultation document, all section 1 options will pass through nationally important Class 1 and Class 2, plus Class 5 deep peat areas and it will be important to minimise potential ecological impacts by avoiding peat habitats. Peat surveys should be carried out in line with Scottish Government Guidance. Further advice for development on peat is also available in our guidance. Any significant effects on these areas must be overcome by siting, design or other mitigation measures.</p> <p>In your appraisal summary Peat is mentioned explicitly but only under the Engineering category. If it is included in the Environmental assessment it is not clear where.</p> <p><i>Biodiversity</i></p> <p>We fulfil our advisory role on protected species through the provision of standing advice and do not expect to be consulted other than in exceptional circumstances not covered by the relevant standing advice available. You will need to consider the need for species licences as part of any development and contact <a href="mailto:licensing@nature.scot">licensing@nature.scot</a> regarding any licence application.</p> <p>It is not clear from your consultation document why options 1A and 2A have been assigned an Amber Rating whilst the other routes have been assigned a Green Rating. Please can this be clarified?</p>	<p>SSEN Transmission highlight the fact that Option 1C was allocated an Amber RAG rating for designated sites, this rating was allocated as the assessment identified that Option 1C is the only option which poses a potential collision risk to the birds as it lies at a similar altitude to the adjacent loch, and as such it is least preferred. The on-going and long term collision risks of the OHL will be further considered during the consenting stage of the project.</p> <p>SSEN Transmission confirm peat probing surveys will be carried out to inform design and environmental assessment as part of the consenting stage of the project and will inform the final design and mitigation strategy of the Proposed Development.</p> <p>SSEN Transmission will consider the need for species licences as part the Proposed Development.</p> <p>Under the SSEN Routeing Guidance, peat is considered as an engineering element but the presence of peat will inform the EIA process and design of the Proposed Development going forward.</p> <p>In line with the SSEN Routeing Guidance for OHL Infrastructure<sup>5</sup>, Alignment Options have been ranked in relation to the extent and distribution of irreplaceable habitat present, as well as taking into account the estimated BU value. Options 1A and 2A overlap with significantly larger areas of irreplaceable habitat than other options and have therefore been allocated Red RAG ratings.</p> <p>Ornithological surveys including both breeding and non-breeding seasons are currently underway (to be completed in February 2024). The results of these surveys will be provided as part of the environmental assessments supporting the Section 37 consent application. The results of the surveys undertaken to date have been used to inform the alignment selection process.</p>

Consultee	Summary of Feedback	Response by SSEN Transmission
	<p><i>Ornithology</i></p> <p>There are several references to ornithological surveys ‘March 2023 to February 2024’ that inform the alignment report. If these dates are correct the surveys have not yet been completed and cannot yet fully inform the alignment report. We would welcome a copy of the results if the survey is already complete or when the survey is completed. This survey and resulting report should include both the breeding season and the non-breeding season for species potentially resident all year round, particularly hen harrier, black grouse and black-throated diver.</p> <p>Section 4.1.1 (Environmental Considerations) mentions “Minimising the likelihood of bird collisions on the OHL and reduce impacts during construction on bird species”. The assessment must include as a priority the ongoing and long-term collision risks of the OHL.</p> <p>We agree with the current assessment that all Route Options have been assigned an Amber RAG rating as they all pass through habitat supporting notable bird species and the surveys probably are not yet complete.</p> <p><i>Hydrology, Geology and Hydrogeology</i></p> <p>At this time, we have no additional comments on the alignment assessment for on this category.</p> <p><b>Landscape and Visual</b></p> <p>Under NatureScot’s remit we have not included consideration of visibility from the public road or from other common viewpoints, although we appreciate these will be important in the decision making process and will be an important factor to be considered by other consultees.</p> <p>All Alignment Options are outwith Wild Land Areas. Following the Wild Land Areas guidance issued in National Planning Framework 44 (section 4g), we have no additional comments on the Alignment Options at this stage.</p>	<p>SSEN Transmission will consult with NatureScot and the LPA to agree proposed viewpoints to be used in the landscape and visual amenity assessment during the scoping stage.</p>
RSPB Scotland	<p>RSPB confirmed they have no available resource to respond in detail at this time. However, route and alignment selection should consider the results of any bird surveys being undertaken. RSPB confirm they are happy to be consulted on the the route and alignments proposed when the bird survey results are available and discuss further with SSEN Transmission.</p>	<p>Noted. SSEN Transmission will share the results from the on-going ornithology surveys with RSPB when available.</p>
SEPA	<p>We note that the preferred option follows the edge of the forestry, then follows the line of an existing track and then an existing OHL. This all seems a sensible approach in relation</p>	<p>SEPA’s comments on the preferred alignment is noted. The requirement to follow the forestry corridor is a key consideration for</p>

Consultee	Summary of Feedback	Response by SSEN Transmission
	<p>to likely impacts on the aspect of the environment in which we have an interest, but the final route and position of poles and any supporting infrastructure should avoid impacts of sensitive groundwater dependent terrestrial ecosystems (GWDTE), include buffers to watercourses and avoid deeper peat in line with our attached previous advice.</p> <p>We would be very happy to provide layout advice once you have determined the location of poles and supporting infrastructure and completed peat probing and National Vegetation Classification (NVC) survey work.</p>	<p>the design of the Proposed Development to lessen the visual impact. SSEN Transmission will undertake consultation with SEPA once the location of poles and supporting infrastructure, peat probing and NVC survey work are completed.</p>
John Muir Trust	<p>Route option 2 would have a less negative impact on the Ben Klibreck - Armine Forest Wild Land Area (WLA) than would occur with Route option 3 which would pass closer to the boundary of the WLA. Also, by following the forestry corridor the visual impact of the connection is likely to be lessened.</p> <p>This will be helpful in deciding upon the most appropriate route for this development.</p>	<p>SSEN transmission agree with John Muir Trust's feedback on the Route Options. Route Option 2 was taken forward as the Proposed Route and Alignment Options derived from there. The requirement to follow the forestry corridor is a key consideration for the design of the Proposed Development to lessen the visual impact.</p>
JRC Windfarm Coordination	<p>JRC has no comment to make on this application at this time.</p>	<p>Noted.</p>
Scottish Forestry	<p>Scottish Forestry are in general agreement with the selection of the Preferred Alignment. However, Scottish Forestry raise several concerns in relation to the development proposals on nearby forests and woodlands.</p> <p>In line with Scottish Government's wider objective to protect and expand Scotland's woodland cover, applicants are expected to develop their proposal with minimal woodland removal. Woodland removal should be allowed only where it would achieve significant and clearly defined additional public benefits.</p> <p>Scottish Forestry highlight that the need for compensatory planting due to woodland removal should be considered relevant to the proposals. Additionally, several themes within NPPF 4 – Policy 6 Forestry, Woodlands and trees are identified as relevant to this project, which again focus on the need for compensatory planting and the need to avoid loss of ancient woodland and native woodlands.</p> <p>Scottish Forestry welcomes SSEN Transmission commitments to ensure that proposed changes to woodland address the requirements of the Control of Woodland Removal Policy and other relevant guidance. The eastern section of the proposed route appears to impact woodland creation schemes funded by Scottish Government.</p> <p>To inform future scoping and EIA consultation Scottish Forestry advises the developer to include detailed information on the types and areas of forestry to be felled and restocked</p>	<p>SSEN Transmission acknowledge the feedback provided by Scottish Forestry in relation to the Preferred Alignment. As highlighted by Scottish Forestry, SSEN Transmission are committed to ensure that any proposed changes to woodland address the requirements of the Control of Woodland Removal Policy and other relevant guidance. This is an essential part of the design development process, with careful consideration given in the pole spotting process to ensure the requirement for woodland removal is avoided as far as reasonably practicable when finalising the design of the Proposed Development. SSEN Transmission will continue to involve Scottish Forestry in consultation as part of the consenting stage of the project, and will ensure as much as detail as possible around felling and compensatory planting requirements as part of the Proposed Development.</p>

Consultee	Summary of Feedback	Response by SSEN Transmission
	<p>because of the proposed development. All felling, restocking and compensatory planting proposals must be compliant with the UK Forestry Standard<sup>6</sup>. Any additional felling which is not part of the planning application will require permission from Scottish Forestry.</p> <p>SSEN Transmission should note that any compensatory planting required because of the proposed development, may also need to be considered under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017<sup>7</sup> and should follow the process for preparing a woodland creation proposal as per Scottish Forestry Guidance.</p>	
Defence Infrastructure Organisation (DIO)	<p>The DIO Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.</p> <p>The application site falls within part of the UK Military Low flying System designated Tactical Training Area (TTA) an area within which fixed wing aircraft may operate as low as 100 feet or 30.5 metres above ground level to conduct low level flight training. After review of the proposed development, the DIO Safeguarding Team confirm that the Ministry of Defence has no safeguarding objections to this proposal.</p> <p>The DIO Safeguarding Team highlight that whilst there are no safeguarding objections to this application, the height of the development will necessitate that aeronautical charts and mapping records are amended and therefore the developer must notify UK DVOF &amp; Powerlines at the Defence Geographic Centre with the following information: precise location of development, construction start and end dates, the height above the ground level of the tallest structure, the maximum extension height of any construction equipment and any details of aviation warning lighting fitted to the structures.</p> <p>The MOD must emphasise that the advice provided within this letter is in response to the data and/or information detailed in the developer's document titled Chleainsaid Alignment consultation Document dated May 2023. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may</p>	<p>SSEN Transmission acknowledge the feedback provided into the alignment options associated with the construction and operation of the Proposed Development and are pleased that the DIO/MOD have no safeguarding objections to the proposal.</p> <p>SSEN Transmission will happily share the requested information as required in order to allow for the accurate update to aeronautical mapping of the area.</p> <p>SSEN Transmission will notify and consult with the DIO/MOD if any variation of the parameters of the Proposed Development as described in the May 2023 Alignment Consultation Document change in any way and will provide adequate time to carry out any assessments and to provide a formal response.</p>

<sup>6</sup> <https://forestry.gov.scot/sustainable-forestry/ukfs-scotland>

<sup>7</sup> <https://forestry.gov.scot/support-regulations/environmental-impact-assessment>

Consultee	Summary of Feedback	Response by SSEN Transmission
	<p>significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. The MOD should be consulted in the event of any amendment to the design of the Proposed Development.</p>	
FLS	<p>FLS highlight that the majority of the land between the 2 substations is part of Scotland's Nation Forest and Land (NFL) managed by Forestry and Land Scotland (FLS) on behalf of Scottish Ministers. All of the suggested alignments being considered will have an impact on the NFL. FLS highlights its concerns raised during the routeing stage but reiterates the corridor in which the alignment options are being considered has the least impact on forest management of the three route options considered.</p> <p>FLS objects to any new OHL crossing the NFL as the cumulative effects of it and the existing infrastructure is an unreasonable constraint on FLS' ability to sustainably manage the NFL. The cumulative effects include the recently constructed 132kV OHPL that services Creag Riabhach Wind Farm and the proposed small wind farm and associated infrastructure that is proposed on the west side of the Dalchork Forest block.</p> <p>Of the alignments being considered FLS objects to and will not accept the use of alignment options 1B, 1C, 2B1 and 2B2 due to the loss of productive forest and the additional burdens and increased costs associated with harvesting the adjacent crop.</p> <p>FLS' considers the route alignments 1A and 2A to be the least burdensome to the management the NFL but objects to the installation of another OHL across the NFL. FLS is not an expert on the undergrounding of cables and what is and what is not technically feasible but there is scepticism of SSEN's apparent default response to any new power line proposal is that it should be an overhead line; this scepticism comes from a perception that SSEN's resistance to undergrounding is more due to familiarity with the overground technology rather than for sound technical reasons. If undergrounding a particular section of powerline is technically impossible FLS needs to be convinced of this.</p> <p>The proposed new export cable is for the proposed Chleasaid Wind Farm for which the proposed access will be along the Dalnassie Estate access road that runs across the NFL. The export cable and the wind farm are separate but interdependent projects that require different planning consents but both, in part at least, funded by the wind farm developer. It appears to FLS if the design and build of the wind farm access road, which basically requires the existing estate access track to be widened onto the NFL, and the construction and installation of the export cable underground along the proposed access roads verge were done as a single construction project there would be less disruption and</p>	<p>SSEN Transmission thanks FLS for highlighting their concern around the impact of the Proposed Development on areas of NFL.</p> <p>SSEN Transmission would like to highlight that for a connection of this length and scale an underground cable is the significantly less preferred option from both an economic and technical perspective. For example, due to the significant 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 buried archaeology associated with designated assets), and peat habitat. Please note that the document specifically states 'until a proposed alignment' and 'studies are undertaken' the 'requirements for other technology' is unknown.</p> <p>From an environmental perspective, an underground cable is less preferable in this area for a number of reasons. A UK Habitat survey was undertaken this year which identified several priority habitats including peatland habitats. Peatland poses an economic and environmental constraint at this site as there are pockets of deep peat which are in good condition. A peat probing exercise is ongoing to identify exact locations of deep peat within the site. If we were to underground the proposed development, we would be required to excavate a trench that's approximately 6.5m wide and 1.5m deep which would have significant impact on this habitat. Although a restoration exercise can be undertaken following construction the impact upon these may still be considerable.</p> <p>SSEN Transmission would like to highlight that, as stated in our Consultation Document, we are currently considering the use of an OHL subject to the outcomes of the detailed engineering and environmental surveys that are currently ongoing.</p>

Consultee	Summary of Feedback	Response by SSEN Transmission
	<p>environmental damage during construction, potential economies of scale, the cable inspection chambers could be easily accessed from the road to assist long term maintenance, the amount of overhead wires would not be increased reducing the schemes visual impact and the cables resilience to storm damage for the period it is in situ would be increased.</p> <p>FLS highlight in order to make the Proposed Alignment across NFL acceptable then the OHL should be undergrounded, ideally in the verge of the proposed Chleasaid Windfarm's access road.</p>	



## 7. CONCLUSIONS AND NEXT STEPS

### 7.1 Summary

This Report on Consultation documents the consultation process which has been undertaken for the project between May 2023 and June 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 Alignment.

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

The responses provided largely agreed with the Preferred Alignment (Option 1A and 2B1), and largely agreed with the RAG ratings allocated as part of the combined environmental, engineering and cost comparative appraisal work. The responses provided recognised that the Preferred Alignment runs through a sensitive environment with challenging terrain. However, the Preferred Alignment has been selected on the basis that is considered to provide an optimum balance of environmental, technical and economic factors. Additionally, the responses highlighted the benefit of having sight of detailed design information, such as the grid references of OHL pole locations, once confirmed.

Additional information provided had the potential to impact upon the selection of a Preferred Alignment, this information has been reviewed and factored into the selection of the Proposed Alignment. The Proposed Alignment is shown on **Figure 7.1**.

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:

- Further environmental survey and assessment work will be undertaken in parallel with the engineering studies, the results of which will be reported as part of the Section 37 consent application; and
- Further consultation will be organised with key statutory and non-statutory consultees, local councillors and local communities to provide updates on the project. 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, through which assessments will be carried out for all relevant environmental aspects. This process will remain inclusive, seeking further consultation where appropriate.

Detailed analysis of potential Alignment Options within the Proposed Alignment 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 4 (EIA and consenting). During this stage the Proposed Alignment and associated infrastructure will be assessed from an environmental perspective, environmental impacts identified, and mitigation measures adopted to minimise environmental effects as far as is practicable.

Members of the public and other interested stakeholders will be invited to attend an information event at Stage 4 which will present the proposals for which necessary consents and permissions under the Electricity Act 1989 will be sought. The anticipated programme is as follows:

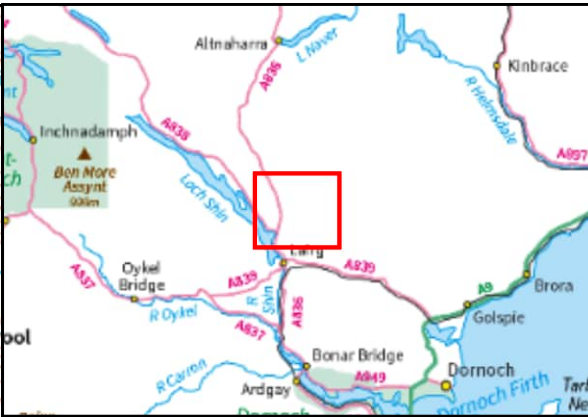
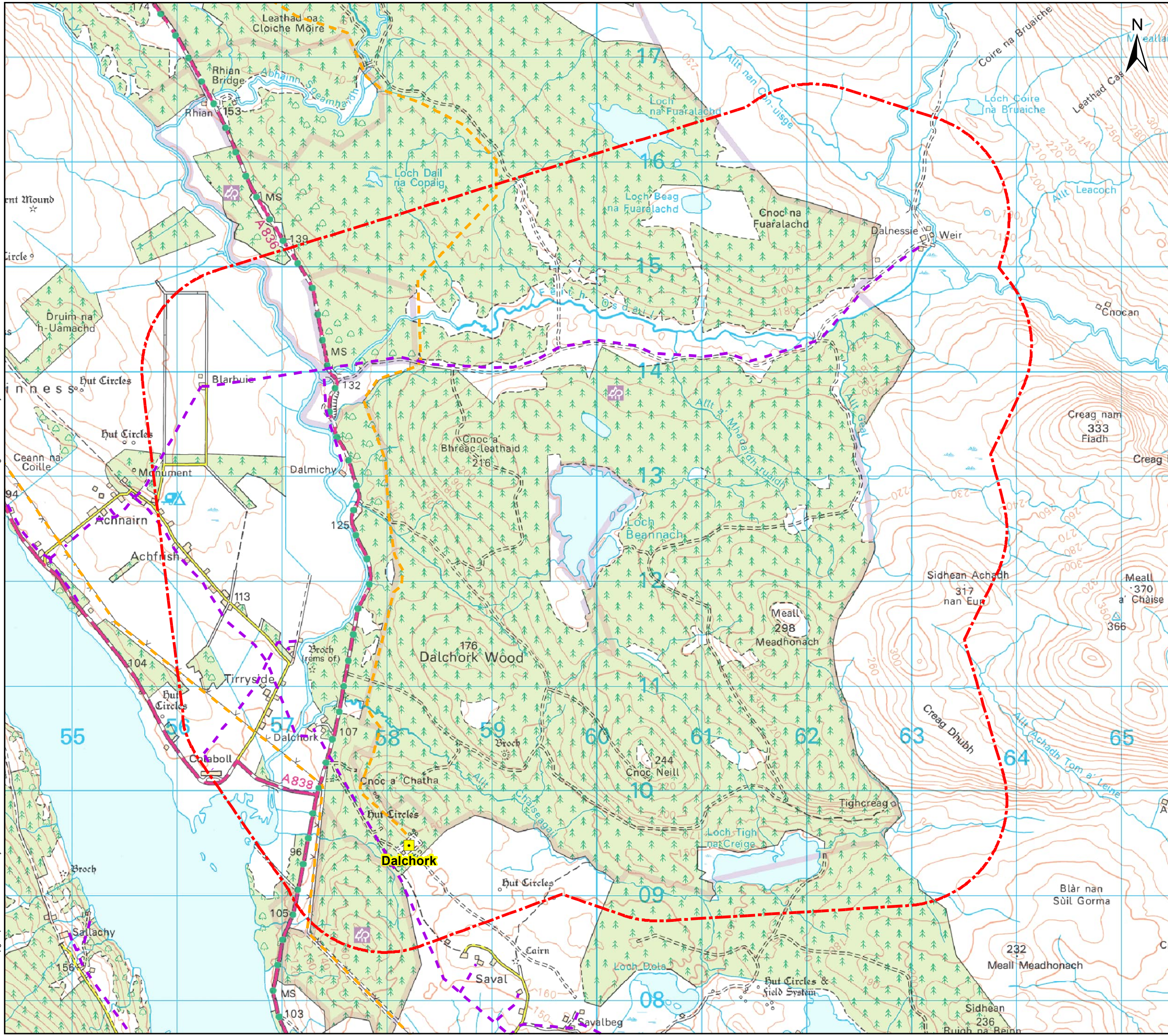
- Summer 2023 - Request for EIA Screening Opinion.
- Autumn/ Winter 2023 - Finalise design to make applications for necessary consents and permissions.
- Winter 2023 and Spring 2024 - Section 37 application.

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

## APPENDIX A: FIGURES



Date Saved: 4/5/2023  
Document Path: \\uk.wspgroup.com\central\_data\Projects\70099xx\70099990 - Chleasaid Wind Farm Connection\03 WIP\3E- GIS\MXD\CWFC-WSP-DA-GIS-002 Figure 3.1 v2 - Study Area.mxd



**Legend**  
 Study Area  
 Existing Substation  
**Existing OHL**  
 11 kV  
 33 kV  
 132kV

0 1 2 km

Client: Scottish & Southern Electricity Networks  
TRANSMISSION

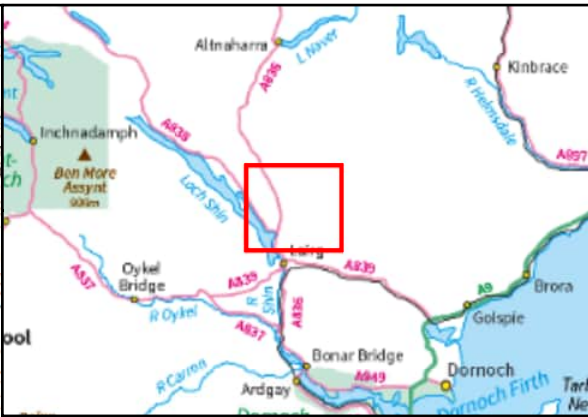
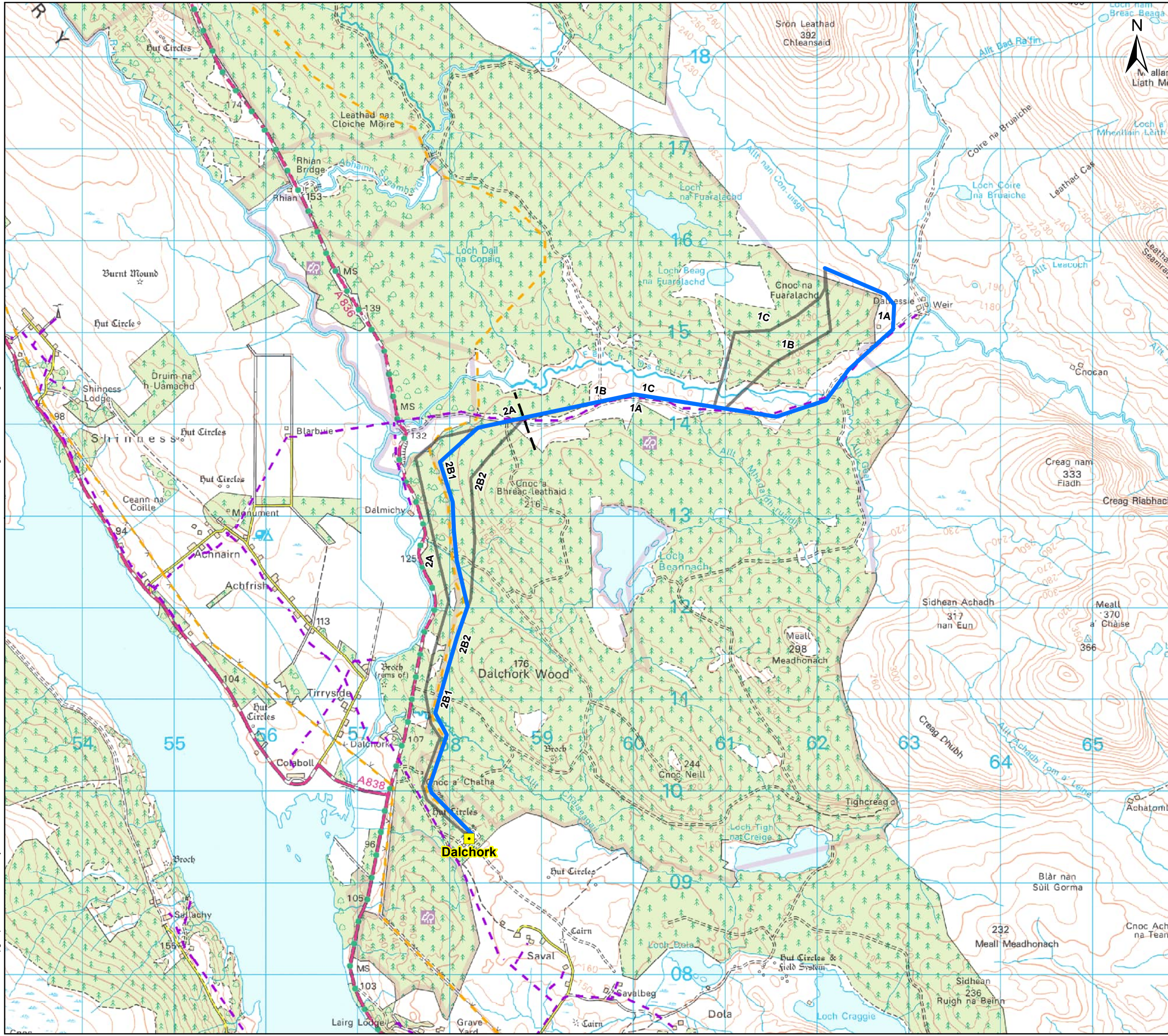
Project: Chleasaid Wind Farm Connection

Title: Figure 2.1: Study Area

Date: 4/5/2023	Scale: 35,000 @ A3
Drawn: AS	Checked: IM
Approved: JB	
Drawing Number: CWFC-WSP-DA-GIS-002	



Date Saved: 4/19/2023  
Document Path: \\uk.wspgroup.com\central\_data\Projects\700999xx\170099990 - Chleasaid Wind Farm Connection\03 WIP\3E- GIS\MXD\CWFC-WSP-DA-GIS-116 Figure 7.1 Preferred Alignment.mxd



**Legend**

- Preferred Alignment
- Discounted Alignment Options
- Section Line
- Existing Substation
- Existing OHL**
  - 11 kV
  - 132kV

0 1 2 km

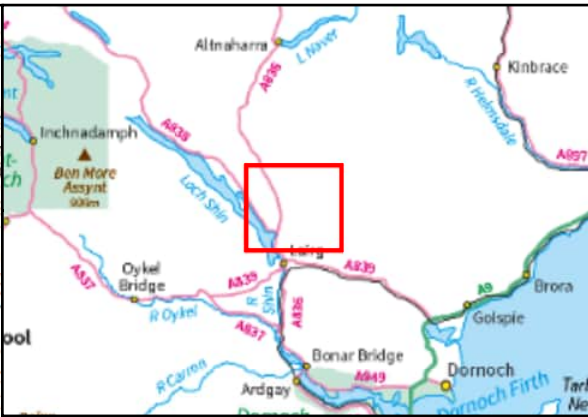
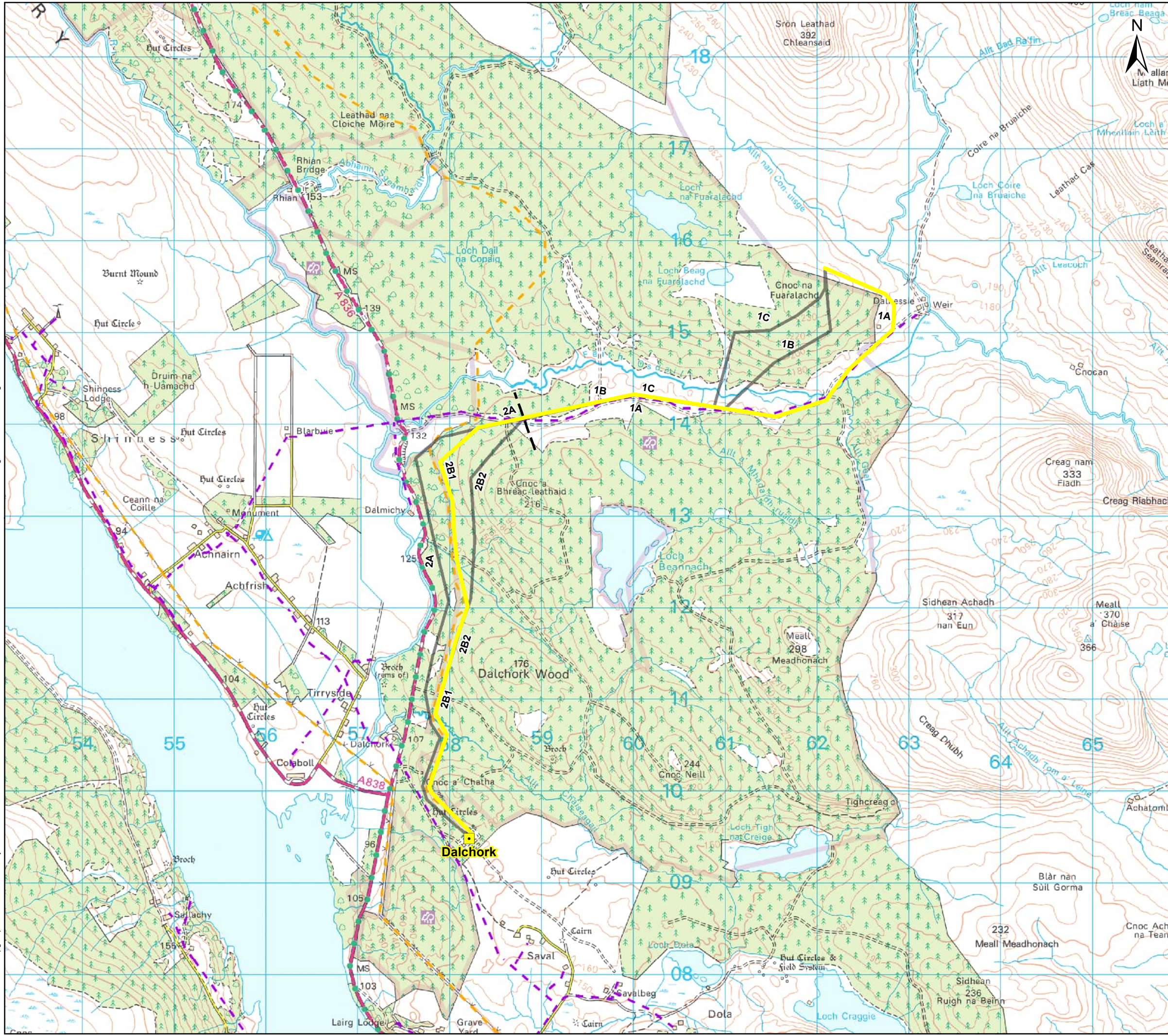
Client:

Project: Chleasaid Wind Farm Connection

Title: **Figure 3.1 Preferred Alignment**

Date: 4/19/2023 Scale: 40,000 @ A3  
Drawn: CB Checked: IM Approved: JB  
Drawing Number: CWFC-WSP-DA-GIS-119





**Legend**

- Proposed Alignment
- Discounted Alignment Options
- Section Line
- Existing Substation

**Existing OHL**

- 11 kV
- 132kV

0 1 2 km

Client:

Project: Chleasaid Wind Farm Connection

Title: **Figure 7.1 Proposed Alignment**

Date: 4/19/2023 Scale: 40,000 @ A3  
Drawn: CB Checked: IM Approved: JB  
Drawing Number: CWFC-WSP-DA-GIS-120