

# Report on Consultation Alignment Selection & EIA Scoping

## Inveraray to Crossaig 275 kV Overhead Line

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## **GLOSSARY AND ABBREVIATIONS**

132 kV	132 kilovolt (132,000 volt) operating voltage electrical circuit.
275 kV	275 kilovolt (275,000 volt) operating voltage electrical circuit
Alignment	A centre line of an overhead line, along with the location of key angle structures.
AOD	Above Ordnance Datum
Baseline Alignment	The Baseline Alignment aims to provide the optimal alignment within the Proposed Route, taking account of Technical criteria. The Baseline Alignment is also considered to represent the base cost option.
BGS	British Geological Survey
CAWL	Core Areas of Wild Land – extensive areas of high wildness as defined by Scottish Natural Heritage.
Conductor Gallop	An oscillation of single or bundled conductors due to wind action on an ice or wet snow deposit on the conductors. When a wind pressure acts on the iced conductors, it causes uplift and consequent galloping, or jumping motion occurs.
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. A corridor should also take account of any pinch points along its length where subsequent design development may be subject to fundamental restrictions which may limit the eventual viability of a project or gaining consent. The Corridor precedes the development of a Route.
Deviation	An alignment alternative proposed where there are different ways to avoid a localised constraint(s). For the purposes of this report all deviation options refer to deviations from the Baseline Alignment.
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 currently set out in <i>The Electricity Works (EIA) (Scotland) Regulations 2017</i> . The EIA process is used to systematically identify, predict, assess and report on the likely significant environmental impacts of a proposed project or development.
Envirocheck	The Envirocheck Report, by Landmark Information Group, is a desk study service providing accurate and up to date data describing potentially contaminative land use, geology, natural environmental hazards and areas of environmental sensitivity from national, regional and local data providers.
GDL	Garden and Designed Landscape, as listed on the Inventory of Gardens and Designed Landscapes held by Historic Environment Scotland.
GWDTE	Groundwater Dependent Terrestrial Ecosystem
HES	Historic Environment Scotland



Holford Rules	A set of 7 rules, first developed in 1959 by Sir William Holford, which define the principles of route selection for overhead lines and which continue to inform transmission line routeing in the UK
IBA	Important Bird Areas are designated by Birdlife as places of international significance for the conservation of birds and other biodiversity <sup>1</sup> . They are a non-statutory, international designation.
LCT	Landscape Character Type
Lidar	Light Detection and Ranging. A method used for <b>surveying</b> overhead lines that measures distance to a feature by illuminating that feature with a pulsed <b>laser</b> light, and measuring the reflected pulses with a sensor.
OHL	Overhead line. An electric line installed above ground, usually supported by lattice steel towers or wooden poles.
Planning application	An application for planning permission under the Town and Country Planning (Scotland) Act 1997, as amended by the Planning etc. (Scotland) Act 2006. It should be noted that consent under section 37 of the Electricity Act 1989 usually carries with it deemed planning permission from the Scottish Ministers under Section 57 of the Town and Country Planning (Scotland) Act 1997.
Preferred alignment	An alignment for the overhead line taken forward to stakeholder consultation following a comparative appraisal of alignment options.
Preferred Route	A route for the overhead line taken forward to stakeholder consultation following a comparative appraisal of route options.
Proposed Alignment	An alignment taken forward to consent application. It comprises a defined centre line for the overhead line and includes an indicative support structure (tower or pole) schedule, also specifying access arrangements and any associated construction facilities.
Proposed OHL	The proposed new 275 kV overhead transmission line between Inveraray Switching Station and Crossaig Substation.
Proposed Route	A route taken forward following stakeholder consultation to the alignment selection stage of the overhead line routeing process. The Proposed Route for the purposes of this report is the route which was arrived at from the Environmental Route Options Report (ASH, 2014).
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.
SAC	Special Area of Conservation - designated under <i>Directive 92/43/EEC</i> on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as - The Habitats Directive).
Section 37 (s37) application	An application for development consent under section 37 of the Electricity Act 1989.
SEPA	Scottish Environment Protection Agency

 $<sup>^1</sup>$  www.birdlife.org



SHE Transmission plc	Scottish and Southern Electricity Networks (SSEN), operating as Scottish Hydro Electric Transmission plc under licence, is responsible for maintaining and investing in the electricity transmission network in the north of Scotland.
SNH	Scottish Natural Heritage
SPA	Special Protection Area – designated under <i>Directive 2009/147/EC on the Conservation of Wild Birds</i> (the Birds Directive)
SSSI	Site of Special Scientific Interest – designated by SNH under the <i>Nature Conservation (Scotland) Act 2004</i>
Study Area	The area within which the corridor, route and alignment study takes place.
Tower Spotting	Determining structure locations along an alignment.
Wayleave	Agreement between a landowner and the network operator, which grants the network operator rights to install, maintain and operate lines or cables over a defined route. The Agreement is negotiated between SHE Transmission and a landowner whereby they undertake to grant a Wayleave, to be followed by a Deed of Servitude upon construction of the overhead line. A Necessary Wayleave is granted by The Scottish Ministers on behalf of a landowner if it is deemed expedient that such a wayleave should be granted, but only sought in circumstances where that landowner will not grant a Wayleave voluntarily.
WLA	Wild Land Area, as classified by SNH (2014)
ZTV	Zone of Theoretical Visibility - the theoretical visibility of an object in the landscape.



## PREFACE

This Report on Consultation has been prepared by Scottish Hydro Electric Transmission plc (SHE Transmission plc) to provide a summary of how we have responded to comments from all interested parties on the Preferred Alignment identified for the proposed Inveraray to Crossaig 275 kV Overhead Line project.

Public consultation events presenting details of the proposals described in this document were held in September 2017, these events were advertised publicly via traditional printed media, social media and through postal notification. Copies of the information presented at these public exhibitions can be found on the project website at https://www.ssen-transmission.co.uk/projects/inveraray-crossaig/

This Report on Consultation also provides a summary of how SHE Transmission have responded to comments received throughout the Environmental Impact Assessment (EIA) Scoping process. The EIA Scoping process concluded on 20<sup>th</sup> December 2017 with the publication, by the Scottish Government Energy Consents Unit, of the Scoping Opinion. The Scoping Opinion is published on behalf of the Scottish Ministers Under Part 4 of the Electricity Works (Environmental Impact Assessment)(Scotland) Regulations 2017. The full version of the Scoping Opinion can be found on the Energy Consents Unit website at http://www.energyconsents.scot/

Inveraray to Crossaig 275 kV Scoping Report, August 2017, prepared by SHE Transmission, is available at the project website at https://www.ssen-transmission.co.uk/projects/inveraray-crossaig/



## **EXECUTIVE SUMMARY**

This Report on Consultation summarises the responses to comments made by interested parties to the Preferred Alignment selected by SHE Transmission plc (part of Scottish and Southern Electricity Networks) for a new 81 km double circuit 275 kilovolt (kV) overhead line (OHL), supported by steel lattice towers, to connect between Inveraray Switching Station and Crossaig Substation, in Argyll, Scotland.

The existing transmission network serving eastern Argyll and the Kintyre Peninsula was originally designed to serve a rural area with low demand for electricity. Requests from renewable generation developers to connect to the electricity network in this area exceeds the capacity of the existing transmission system. As a result, a new OHL is required. The new OHL would replace the existing 132 kV OHL.

SHE Transmission is following a three-stage approach to routeing, as follows:

- Stage 1: Corridor/Route Selection;
- Stage 2: Alignment Selection; and
- Stage 3: Consenting Process.

Stage 1 was completed in 2015, with a Proposed Route for the OHL selected, based on earlier studies and consultation. A Consultation Document was published in June 2017, describing the Stage 2 Alignment Selection process, which selected a Preferred Alignment for the OHL.

All comments received in response to the Consultation Document (June, 2017) informed further consideration of the Preferred Alignment (Stage 2), and the selection of an Indicative Proposed Alignment.

The Indicative Proposed Alignment was taken forward into Stage 3 Consenting Process for more detailed environmental assessment. The Indicative Proposed Alignment was included in the Inveraray to Crossaig 275 kV Scoping Report, August 2017. The EIA Scoping stage concluded on 20<sup>th</sup> December 2017 with the publication, by the Scottish Government Energy Consents Unit, of the Scoping Opinion.

Following the requirements contained in this Scoping Opinion, SHE Transmission is preparing an EIA Report; which will be submitted to accompany the submission of an application for consent for a Proposed Alignment under section 37 of the Electricity Act 1989.

The purpose of this Report on Consultation is to inform stakeholders of how their comments made during the Alignment Consultation and EIA Scoping process, have been responded to, by SHE Transmission, prior to the submission of an application for consent for the Proposed Alignment under section 37 of the Electricity Act 1989.



## **INTRODUCTION**

#### 1.2 Purpose of Document

- 1.2.1 SHE Transmission plc (part of Scottish and Southern Electricity Networks) is developing proposals to construct and operate a new 275 kilovolt (kV) overhead transmission line (OHL) between Inveraray Switching Station and Crossaig Substation to replace the existing 132 kV overhead line from Inveraray to Crossaig.
- 1.2.2 This Report on Consultation has been prepared to inform all stakeholders of the Proposed Alignment selected and to inform stakeholders of how the comments they made during the Alignment Consultation and EIA Scoping process, have been responded to, by SHE Transmission, prior to the submission of an application for consent for the Proposed Alignment under section 37 of the Electricity Act 1989.

#### 1.3 Project Background

- 1.3.1 SHE Transmission plc is the transmission license holder in the north of Scotland and has the following duties under Section 9 of the Electricity Act 1989:
  - to develop and maintain an efficient, coordinated and economical system of electricity transmission; and
  - to facilitate competition in the generation and supply of electricity.
- 1.3.2 SHE Transmission also has obligations to offer non-discriminatory terms for connection to the transmission system. As such, SHE Transmission has a legal duty to provide connections for new electricity generators wishing to connect to the transmission network in its licence area under the terms of its statutory and licence obligations. SHE Transmission is obliged to make its transmission network available for these purposes and ensure the system is fit for purpose through appropriate reinforcements to accommodate the contracted capacity.
- 1.3.3 The existing transmission network serving eastern Argyll and the Kintyre Peninsula was originally designed to serve a rural area with low demand for electricity. Requests from renewable generation developers to connect to the electricity transmission network in this area exceed the capacity of the existing transmission network. As a result, a new OHL is required between Inveraray Switching Station, in the north, and Crossaig Substation in the south, a distance of approximately 81 km (see Figure 1.1 in the Annex to this document). The new OHL would replace the existing 132 kV OHL, which will be removed once the new OHL is operational.
- 1.3.4 The new OHL would be supported by galvanised steel lattice towers. Each tower will have three arms on each side, each supporting an insulator string carrying two conductors (12 conductors in total). An earth wire would be strung between the tops of the towers.
- 1.3.5 The specific tower design and span length will vary to account for detailed engineering requirements. The typical span distance between L8(c) towers would be between 300 m to 350 m. The indicative schedule of tower types, heights and locations will be submitted with the EIA Report as a Technical Appendix. The indicative maximum tower height specified in the Technical Appendix is 62.1 m above ground level and the average tower height is 51.2 m above ground level.



#### 1.4 Structure of the Report

- 1.4.1 The remaining sections of this report are structured as follows:
  - Section 2 describes the overall SHE Transmission routeing process.
  - Section 3 describes the comments made by stakeholders during the Alignment Consultation period between June 2017 to November 2017 and the response to those comments by SHE Transmission.
  - Section 4 describes the comments made by stakeholders during the EIA Scoping process between August 2017 and December 2017 and the response to those comments by SHE Transmission.



## SHE TRANSMISSION ROUTEING PROCESS

#### 2.1 Overview of Routeing Process

- 2.1.1 In the development of this project, SHE Transmission is following a three-stage approach, as follows:
  - Stage 1: Corridor/Route Selection;
  - Stage 2: Alignment Selection; and
  - Stage 3: Consenting Process.
- 2.1.2 Stage 1 was completed in 2015, with a Proposed Route for the OHL selected, based on earlier studies and consultation.
- 2.1.3 Stage 2 Consultation Document was published in June 2017, describing the Stage 2 Alignment Selection process, which selected a Preferred Alignment for the OHL. All comments received in response to the Consultation Document (June, 2017) informed further consideration of the Preferred Alignment (Stage 2), and the selection of an Indicative Proposed Alignment.
- 2.1.4 Stage 3 Consenting process began in August 2017. The Indicative Proposed Alignment was taken forward into Stage 3 Consenting Process for more detailed environmental assessment. The Indicative Proposed Alignment was included in the Inveraray to Crossaig 275 kV Scoping Report, August 2017. The issue of the Scoping Report commenced the EIA process. The EIA Scoping stage concluded on 20<sup>th</sup> December 2017 with the publication, by the Scottish Government Energy Consents Unit, of the Scoping Opinion. Following the requirements contained in this Scoping Opinion, SHE Transmission is preparing an EIA Report; which will be submitted to accompany the submission of an application for consent for a Proposed Alignment under section 37 of the Electricity Act 1989.
- 2.1.5 Each stage in the SHE Transmission routeing process is iterative, bringing cost, technical and environmental considerations together in a way which seeks the best balance at each stage. The Preferred Alignment is considered to represent the optimum balance of technical, economic and environmental considerations, and has been developed with reference to SHE Transmission's licence obligations under the Electricity Act 1989.



2.1.6 The three-stage approach is illustrated in the flow chart in Diagram 2.

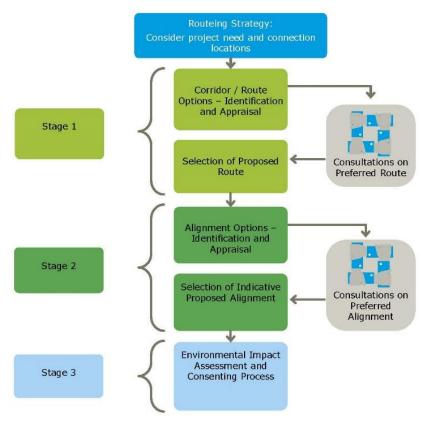


Diagram 2: Overhead Line Routeing Process Flowchart

## 2.2 Stage 1 – Corridor/Route Options – Identification and Appraisal (2014 to 2015)

- 2.2.1 The route selection process was carried out in 2014 and subsequently consulted on in March 2015. From this process, a Proposed Route was selected for the alignment selection stage. A 'Proposed Route' according to the SHE Transmission OHL Routeing Guidance is defined as "a route taken forward following stakeholder consultation to the alignment selection stage of the overhead line routeing process".
- 2.2.2 The results of the route selection stage environmental assessment are described in Environmental Route Options Report (ASH, 2014).

## 2.3 Stage 2 - Alignment Options Identification and Appraisal (2015 to 2017)

- 2.3.1 The alignment selection has been completed with the aim of developing a Proposed Alignment, within the Proposed Route, which is technically feasible and economically viable and which causes the least disturbance to the environment; and those living in it, working in it, visiting it or using it for recreational purposes.
- 2.3.2 The approach adopted in developing and accessing alignment options is consistent with relevant SHE Transmission guidance<sup>2</sup>
- 2.3.3 The guidance recommends appropriate application of the "Holford Rules" to inform routeing. The Holford Rules<sup>3</sup> were first developed in 1959 by Sir William Holford and continue to inform

<sup>&</sup>lt;sup>2</sup> Scottish Hydro Electric Transmission Ltd (SHETL) (2004): Electricity Transmission Development Proposals in Scotland: Appendix 1: The Holford Rules: Guidelines for the Routeing of New High Voltage Overhead Transmission Lines with NGC 1992 and SHETL 2003 Notes



transmission line routeing in the UK. These rules advocate the application of a hierarchical approach to routeing which first avoids major areas of highest amenity, then smaller areas of high amenity, and finally considers factors such as backdrop, woodland and orientation.

- 2.3.4 In this case, the Holford Rules have been applied to the identification and evaluation of alignment options, from which a Proposed Alignment will be defined. It should be noted that the Holford Rules apply the term 'amenity' to refer to environmental designations and classifications such as Natura 2000 sites, Sites of Special Scientific Interest (SSSI), Scheduled Monuments, Listed Buildings, National Parks.
- 2.3.5 The guidance also recognises that the key effect of OHLs is visual and it advises that the routeing of OHLs should consider the types of mitigation or screening that could offset any visual effects.
- 2.3.6 The Holford Rules are reproduced in Box 1.

#### Box 1: The Holford Rules

**Rule 1**: Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the line in the first place, even if the total mileage is somewhat increased in consequence;

**Rule 2**: Avoid smaller areas of high amenity value or scientific interest, by deviation; provided that this can be done without using too many angle towers (i.e. the more massive structures which are used when line change direction);

**Rule 3**: Other things being equal, choose the most direct line, with no sharp changes of direction and thus fewer angle towers;

**Rule 4**: Choose tree and hill backgrounds in preference to sky background wherever possible and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees.

**Rule 5**: Prefer moderately open valleys with woods, where the apparent height of the towers will be reduced and the views of the line will be broken by trees.

**Rule 6**: In country which is flat and sparsely planted, keep the higher voltage lines as far as possible independent of smaller lines, converging routes, distribution lines and other masts, wires and cables so as to avoid a concatenation or 'wirescape'.

**Rule 7**: Approach urban areas through industrial zones where they exist and where pleasant residential and recreational land intervenes between the approach line and substation, go carefully into the costs of undergrounding, for lines other than those of the highest voltage.

#### 2.4 Stage 3 – EIA (2017 to present)

2.4.1 An application for consent for the proposed development will be made to the Scottish Ministers under section 37 of the Electricity Act 1989<sup>4</sup>, along with a request for a direction that planning permission be deemed to be granted under section 57 (2) of the Town and Country Planning (Scotland) Act 1997<sup>5</sup> as amended. The proposed development is categorised as 'schedule 1' development under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017<sup>6</sup> (the EIA regulations). On this basis, the application for consent must be supported by an Environmental Impact Assessment Report (EIA Report).

<sup>&</sup>lt;sup>3</sup> The Holford Rules were reviewed circa 1992 by the National Grid Company (NGC) Plc (now National Grid Transmission (NGT)) as owner and operator of the electricity transmission network in England and Wales, with notes of clarification added to update the Rules. A subsequent review of the Holford Rules (and NGC clarification notes) was undertaken by Scottish Hydro Electric Transmission Limited (SHETL) in 2003 to reflect Scottish circumstances.

<sup>&</sup>lt;sup>4</sup> The Electricity Act 1989, c29.

<sup>&</sup>lt;sup>5</sup> Town and Country Planning (Scotland) Act 1997, c8.

<sup>&</sup>lt;sup>6</sup> The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, No.101.



- 2.4.2 The purpose of the EIA Scoping Report is to ensure that the subsequent EIA Report is focused on the key impacts likely to give rise to significant adverse effects. As well as identifying aspects to be considered in the EIA it also identifies those aspects that are not considered necessary to assess further.
- 2.4.3 In accordance with the EIA regulations, the EIA Scoping Report contained:
  - information to identify the location of the proposed development;
  - a brief description of the nature and purpose of the proposed development and its possible effects on the environment; and
  - information and representations from the applicant on the aspects of the proposed development and environment that are not considered necessary to assess further.
- 2.4.4 The applicant invites consultees to comment on the following:
  - What environmental information do you hold or are aware of that will assist in the EIA described here?
  - Do you agree with the proposed approach for baseline collection, prediction and significance assessment?
  - Are there any key issues or possible effects which have been omitted?
  - Do you agree with the list of issues to be scoped out, and the rationale behind the decision?

Inveraray to Crossaig 275 kV Scoping Report, August 2017, prepared by SHE Transmission, is available at the project website at https://www.ssen-transmission.co.uk/projects/inveraray-crossaig/



## ALIGNMENT CONSULTATION

#### 3.1 Public Exhibitions – Preferred Alignment

- 3.1.1 We hosted events across Argyll and Kintyre during March 2016 to present and consult on our preferred route options for new 275kV overhead line. Before these events SHE Transmission reviewed all the feedback received from the community during previous consultation, engagement with the statutory authorities and potentially affected landowners to determine a Preferred Alignment.
- 3.1.2 Prior to preparing a Section 37 Consent application to the Scottish Government, we held consultation events where members of the public were able to view and comment on the Preferred Alignment.
- 3.1.3 The public consultation events were advertised via a variety of different methods. The events were first highlighted in an SSEN 'Argyll Region' newsletter published in September 2017. Letters of notification were then provided to local councillors, MP and MSP and community councils. A poster was created and both distributed locally and published in The Oban Times and The Argyllshire Advertiser in the run up to the events whilst a press release was created and linked to the project webpage to alert interested parties. An A5 flyer based on the poster was created and distributed via a local mail drop and landowners were provided notification from the project Land Manager.
- 3.1.4 Events were held in the following locations:
  - Tuesday 26th September 2017; Inveraray Loch Fyne Hotel 2pm to 7 pm;
  - Wednesday 27th September 2017; Ardrishaig Public Hall 2pm to 7 pm;
  - Thursday 28th September 2017; Tarbert Village Hall 2pm to 7 pm;
  - Tuesday 3rd October 2017; Skipness Village Hall 2pm to 7 pm;
  - Wednesday 4th October 2017; Carradale Village Hall 2pm to 7 pm.
- 3.1.5 The number of attendees present at each of the public exhibition events is illustrated in Chart 1, below.

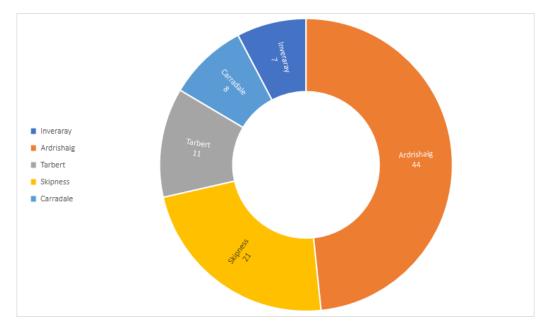


Chart 1: Number of attendees recorded at the Public Exhibitions for the Preferred Alignment.

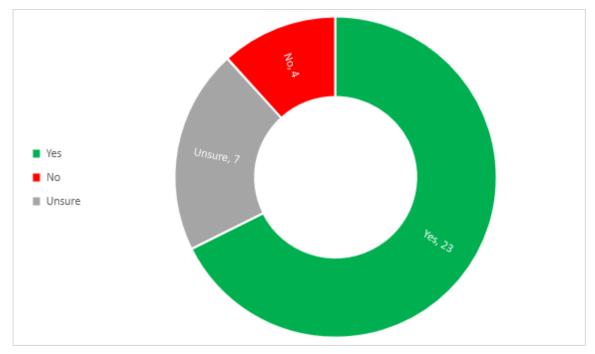


#### 3.2 Public Exhibitions – Public Comments

- 3.2.1 All attendees to the public exhibitions were encouraged to complete a feedback form.
  - 91 registered attendees at events
  - 38 feedback forms received
  - 25% (9) forms received were from community members that did not attend an event
  - 31% of those who attended an event submitted a feedback form.

#### 3.2.2 Question 1 on feedback form:

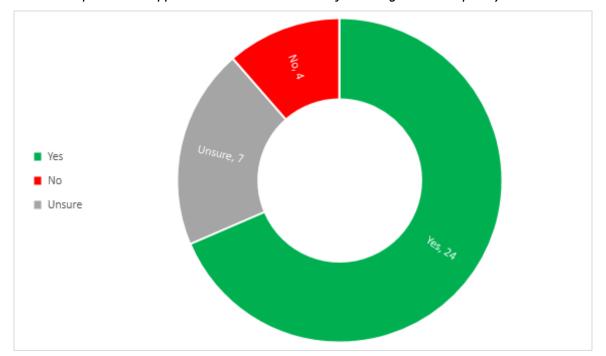
'Have we been clear in providing the reason for selecting our preferred route alignment?'





#### 3.2.3 Question 2 on feedback form:

'Have we explained the approach taken to select the Preferred Alignment adequately?'

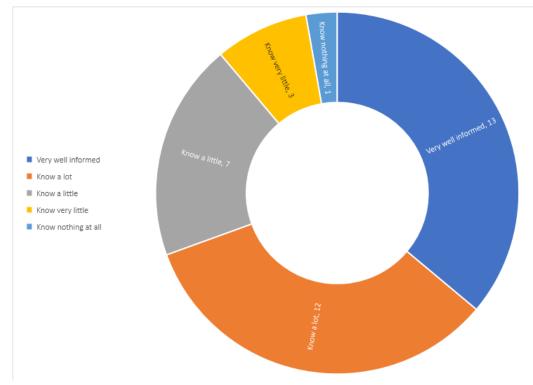


3.2.4 Question 3 on feedback form:

Are there any factors, or important points that should be brought to the attention of the Project Development Team in regards to the preferred route alignment?

- 3.2.5 Sections 3.3 to 3.7 include a summary of the comments or queries provided at each event and the response by SHE Transmission to those queries.
- 3.2.6 Question 4 on feedback form:

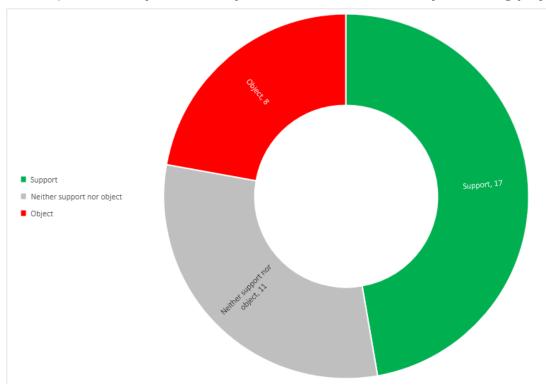
*`Following review of the provided information, how would you describe your reaction to the Inveraray – Crossaig project?'* 





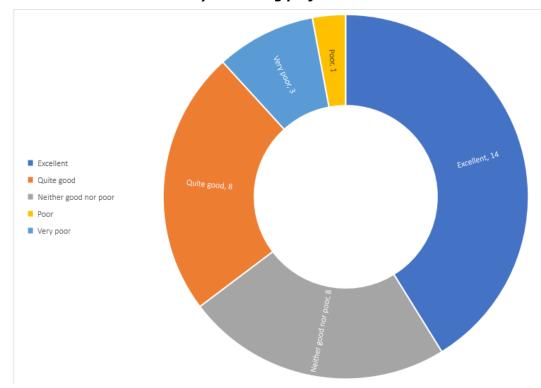
#### Question 5 on feedback form:

'Overall, how would you describe your reaction to the Inveraray – Crossaig project?'



3.2.7 Question 6 on feedback form:

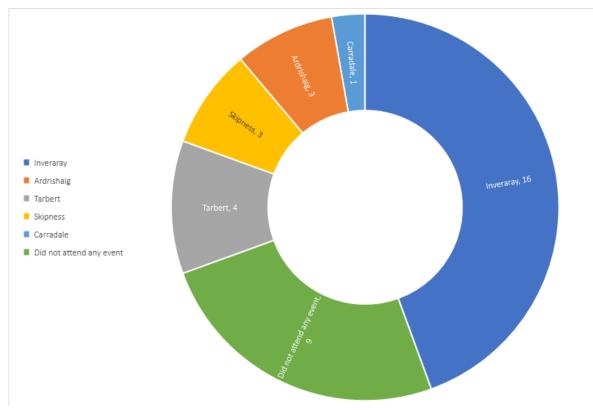
'And finally, from your experience to date, can you rate the quality of the consultation undertaken on the Inveraray – Crossaig project?'



#### 3.2.8 Final question on feedback form:



#### Which event did you attend?



#### 3.3 Inveraray – responses to questions raised

3.3.1 Only one feedback form was received from an attendee at the Inveraray event. The form did not include any concerns or questions.

#### 3.4 Lochgilphead & Ardrishaig – responses to questions raised

Summary of query	Response by SHE Transmission
In order to attempt to mitigate visibility of the line new where it is intended to follow the ridge parallel to the Crinan Canal between Lochgilphead and Ardrishaig, SHE Transmission were asked if there was scope to bring the alignment lower in this area. It was suggested that this in turn	Tower structure heights have been selected in order to maintain suitable span lengths between tower structures, to ensure structural capability with optimum tower numbers and to satisfy electrical safety clearances to ground within the span in line with ESQC requirements. On selection of the Preferred Alignment consideration was also given to minimising angle towers and taking a preference for lower altitudes, due to increased environmental loading on towers with an increase in altitude.
would provide added benefit in terms of placing the towers closer to forest roads for construction access.	All alternative alignment options were assessed for their effect on landscape and visual receptors. The comparative assessment of alternative alignment options at this location is included in Inveraray to Crossaig 275 kV OHL Alignment Selection Consultation Document, June 2017, which can be downloaded from the project website at https://www.ssen- transmission.co.uk/projects/inveraray-crossaig/
It was suggested that an underground cabling solution situated around Lochgilphead	An underground cable solution in this area was considered by the project team and subsequently a cable feasibility study carried out. Due to the level of risk associated with this option



across the Meadows and the Crinan Canal would be preferable. SHE Transmission were also asked to consider this option during previous consultation in 2016.	in terms of Horizontal Directional Drilling (HDD), the recommendation put forward by cabling consultants was to proceed with the overhead line solution to cross the canal. A copy of the Crinan Canal Cable Feasibility Study (Energyline, 2018) is included in Annex 2 of the EIA Report.
	Buffer zones from houses and buildings were considered in the alignment review through Lochgilphead which lead to the proposed alignment. The crossing point of the overhead line at the canal was also a consideration with technical requirements to achieve safe electrical clearances to sailing boats.
A local resident cited an interest in what the biodiversity impacts would be, particularly vascular plants	<ul> <li>An extended Phase 1 habitat survey, was undertaken July to August 2015. Additional habitat and faunal species surveys were completed in May, June, August, October 2016 and October 2017; these surveys comprised:</li> <li>Phase 1 habitat surveys and concurrently completed</li> </ul>
	<ul> <li>Inast i habitat surveys and concurrently completed protected species walkover surveys of sections previously un-surveyed as a result of routeing changes;</li> <li>a National Vegetation Classification (NVC)survey of Balantyre Wood;</li> <li>a woodland habitat quality assessment of Corranbuie</li> </ul>
	<ul> <li>Wood; and</li> <li>further survey of bat roost potential (BRP) trees, identified during previous habitat surveys.</li> <li>All of the results of the habitat surveys are provided in the EIA</li> </ul>
	Report Chapter 6, Ecology and Nature Conservation, which (in June 2018) will be available on the project website at https://www.ssen-transmission.co.uk/projects/inveraray-crossaig/
Many residents raised questions regarding closure of paths during construction, particularly around Brackley/Brenfield forrest, including whether road improvements would be made post construction and how the	Some paths may be upgraded and temporarily diverted during the construction period. The project will have a dedicated Community Liaison Manager during the construction phase who will provide regular updates and ensure local residents are well aware of any closures which may arise during construction, providing prior notice.
community would be made aware. We were asked to pay consideration to recreational path users to ensure it would be safe for the likes of horse riders post construction.	Access tracks to angle towers will be retained post construction. All other new temporary accesses used during construction will be removed. Some existing tracks will be upgraded to FC standards and tracks used during construction will be closed for the duration of the construction of the relevant sections. The closures will be limited as much as possible and will only be in use during the construction of the local towers and line stringing operations.
	Discussions with relevant landowners shall also hold influence in terms of decisions made regarding construction, maintenance and usage of access tracks.
A note of interest for any information regarding a community benefit fund was raised.	We are a regulated business and are not permitted to pay community benefit due to project costs being met by electricity customers across Great Britain. All project costs have to be approved in advance by Ofgem, the electricity industry



regulator. However, we may require to carry out some
improvements to local infrastructure as part of the project
delivery.
There are indirect, but tangible benefits which arise during the
construction of these project and SHE Transmission often seek
opportunities to leave a legacy through either educational
school visits or volunteer days in the local area.

#### 3.5 Port Ann – responses to questions raised

Summary of query	Response by SHE Transmission
Many residents of Port Ann	Three members of the project team met with Port Ann
informed SHE Transmission that	Residents Association to explain the change to the proposals. It
they were unaware of the	was explained that the existing substation will be retained and
consultation events and	will require some internal reconfiguration and a connection will
therefore had not attended. As	require to be maintained between Port Ann and the new line.
Craig Murrail substation is	The team explained that an options assessment was carried out
longer required, SHE	leading to the current design solution which involves removing
Transmission were asked to	the existing line to the North and retaining a portion of the
provided local residents with an	existing line to the South to connect the GSP (substation). This
update as to the effect this	will maintain a two circuit supply to Port Ann giving redundancy
would have on Port Ann	in the event of an outage
substation.	

## 3.6 Inverneil & Tarbert – responses to questions raised

Summary of query	Response by SHE Transmission
Some local residents cited proximity to property as a concern alongside visual amenity as a result of this. A similar concern was raised in Inverneil.	A Residential Visual Amenity assessment has been conducted and included in Chapter 10 of the EIA Report, which (in June 2018) will be available on the project website at https://www.ssen-transmission.co.uk/projects/inveraray- crossaig/ The assessment includes the effect of the Proposed Alignment on living conditions in the context of changes to views and wider aspects of visual amenity from individual dwellings within 500 m of the Proposed Alignment.
Concern was raised from a local resident that Inverneill was at risk of being the only sizeable community directly impacted by the route. In conjunction to this, it was questioned whether this would pose possible health implications in terms of electromagnetic fields.	We are obliged as part of our licence obligations, to ensure that our assets operate within the guidance set by the UK Government. Our project is within limits set by UK government guidance, which in turn is based on the advice of the Government's independent scientific advisers, the NRPB (now part of the Health Protection Agency), who ensures the appropriate level of protection for the public from these fields. Further information on the guidance can be accessed on the UK government website https://www.gov.uk/government/collections/electromagnetic- fields The NRPB keeps the results of EMF health studies under constant review to ensure that the guidelines for limiting exposure are based on the best available scientific information. Additional information on the research into a possible link between electromagnetic fields generated from electricity



Summary of query	Response by SHE Transmission
	transmission infrastructure and human health is documented in the Energy Networks Association (2013) publication Electric and Magnetic Fields.
Apprehensions regarding the projects construction were noted, in particular, access to the tower location sites.	We have sought to utilise the existing track network as much as possible to reduce disruption with a section north of Inverneill proposed to be accessed via the B8024 with an existing track upgrade. The remaining towers close to the village are proposed to be accessed via a short section of new track and new bellmouth south of the village in close proximity to the existing distribution substation.

## 3.7 Skipness & Carradale – responses to questions raised

Summary of query	Response by SHE Transmission
A question was put forward from a resident in Skipness as to what would happen in terms of screening in the	SHE Transmission has created a series of Woodland Impact Assessments (WIAs) to incorporate the proposed development within ongoing forest management activities.
long term after tree felling.	Following consultation with Forestry Commission Scotland (FCS) Woodland Impact Assessments (WIAs) have been commissioned for each woodland ownership requiring felling as result of the proposed development. SHE Transmission has developed 31 individual Woodland Impact assessments (WIAs) for each separate forest property.
	The WIAs will describe the changes to the forest structure resulting from the incorporation of the proposed development into the forest. This would include the changes to, for example, the woodland composition and existing felling programmes. Areas of woodland would need to be felled for the construction and operation of the proposed development including access tracks and other infrastructure. The structure of the woodlands may therefore change, resulting in a potential loss of woodland area. This will be addressed through the redesign of the existing forest including, for example, the use of designed open space; alternative woodland types; changing the management intensity; or the provision of compensation planting.
	Although outside of the scope of the proposed development, the applicant has committed to the development of WIAs for each forest ownership, which will aim to reduce the risk of future wind throw by felling to stable forest edges (outside of the operational corridor). This would also include but is not limited to seeking to agree a forest landscape design that emulate 'natural' patters and forms as part of the WIAs. This issue is included within the 'additional good practice' section rather than as mitigation as the delivery of this design will require the joint working with the forest owner to deliver felling and restocking outside the operational corridor. As explained in Table 11.1, the applicant has agreed the use of the 'Woodland Impact Assessments' to confirm the extent of woodland removal required. This proposed felling will be further reviewed with the landowners to



Summary of query	Response by SHE Transmission
	link this with their existing long term forest plan, which will, once amended, be required to adhere to the UKFS as part of the approval process with the Forest Commission. This approval is required prior to any felling being undertaken outside the proposed development operational corridor or proposed access tracks. This method of addressing felling has been successfully used on a number of recent large overhead line projects and has delivered forest design to the satisfaction of the Forestry Commission as the statutory authority.
	A Forestry assessment has been conducted and included in Chapter 11 of the EIA Report, which (in July 2018) will be available on the project website at https://www.ssen- transmission.co.uk/projects/inveraray-crossaig/
The issue of visual impact on residential property was also raised in Skipness.	A Residential Visual Amenity assessment has been conducted and included in Chapter 10 of the EIA Report, which (in June 2018) will be available on the project website at https://www.ssen- transmission.co.uk/projects/inveraray-crossaig/ The assessment includes the effect of the Proposed Alignment on living conditions in the context of changes to views and wider aspects of visual amenity from individual dwellings within 500 m of the Proposed Alignment.
A responder from Carradale was keen to ensure that we were aware of several pairs of rare breeding birds along the route along with examples of natural woodland and other SSSI's.	Breeding raptor surveys were undertaken within a 1 km buffer of the proposed development utilising methods for golden eagle, white- tailed sea eagle Haliaeetus albicilla, merlin Falco columbarius, peregrine Falco peregrinus, hen harrier Circus cyaneus, osprey Pandion haliaetus and short-eared owl Asio flammeus. Additionally, desk records of osprey territories which are further than 1 km from the proposed development have been included in the assessment as ospreys are known to commute up to 10 km whilst foraging.
	Raptor survey areas included the Inveraray Substation to Balantyre Wood, Barmore Wood to Loch Leacann, Loch Leacann to Minard, Loch Glashan, Stronachullin, Meall Mor, Tarbert to Claonaig and Escart to Crossaig survey areas
	Nesting diver surveys were conducted at 10 lochs. Five lochs within 1 km of the proposed development were identified as suitable to support nesting diver species and where interaction with the proposed development was possible. These nesting lochs were surveyed in summer 2015, with additional surveys in summer 2016.
	The results of the ornithological surveys are provided in the EIA Report Chapter 6, Ornithology which (in July 2018) will be available on the project website at https://www.ssen- transmission.co.uk/projects/inveraray-crossaig/ The results of the protected species and habitat surveys are provided in the EIA Report Chapter 5, Ecology and Nature Conservation.



## **EIA SCOPING**

#### 4.1 Statutory Stakeholders – Scoping Opinion Response to the EIA Scoping Report

4.1.1 Sections 4.2 to 4.9 provide a summary of comments from the statutory consultees during the EIA process to the EIA Scoping Report and the responses and actions taken by SHE Transmission in the EIA Report which (in June 2018) will be available on the project website at https://www.ssentransmission.co.uk/projects/inveraray-crossaig/.

#### 4.2 Seascape, Landscape and Visual Amenity

Table 4.1: Seas	Table 4.1: Seascape, Landscape and Visual Amenity Consultation Responses		
Consultee and Date	Issue Raised	Response/Action Taken	
Scottish Natural Heritage, 13 September 2017	<ul> <li>SLVIA should include assessment of effects on landscapes such as Mountain Glens and Steep Ridgeland and Mountain as well as Rocky Mosaic, Upland Forest Moor Mosaic.</li> <li>North Argyll APQ should be included in the assessment.</li> <li>SNH requested inclusion of consideration of the effect of forest plans and programmed felling on the effect of the proposed development on landscape and visual receptors.</li> <li>Inveraray Castle and Designed Landscape, and near Crarae GDL should be assessed.</li> <li>Effects on the A815 should be considered in the SLVIA.</li> <li>Settlements should be scoped in unless adequate analysis of the effect of planned forest management can be provided to justify their omission.</li> <li>water-based viewpoints should be included given the potential views experienced by high sensitivity receptors including recreational watercraft.</li> <li>Key transport routes, e.g. Tarbert.</li> <li>SNH made a number of additional recommendations relating to routing decisions and mitigation, as well as visualisation standards.</li> </ul>	<ul> <li>All of the landscape and visual receptors requested for inclusion have been included in the SLVIA. Section 4.3 and 4.4 of the SLVIA sets out the baseline landscape and visual context of the study area, and Section 4.7 assesses the residual effects on landscape and visual receptors.</li> <li>It was agreed with SNH and A&amp;B Council that it was impracticable to model or assess forest plans along the entirety of the IPA. The SLVIA assesses landscape and visual effects in respect of the current baseline and makes comment on the potential effects arising in locations where the felling of coniferous plantations may reasonably be expected to alter assessment findings.</li> <li>A series of sequential wirelines for ferry routes have been provided in volume 3b following the request by SNH (see Figure 4.37 to Figure 4.43).</li> </ul>	
A&B Council, 4 December 2017	Generally content with scope, methodology and suggested viewpoints outlined in the scoping submission and defer to specialist statutory consultees including HES and SNH, but cited the revised capacity study in 2017 <sup>7</sup> . A&B Council suggest the following	The NSAs and APQs have been included in the SLVIA at the behest of SNH. Viewpoints were subsequently agreed with SNH and A&B Council prior to commencement of the	

 $<sup>^{7}\</sup> http://www.argyll-bute.gov.uk/planning-and-environment/landscape-wind-energy-capacity-study$ 



Table 4.1: Seas	cape, Landscape and Visual Amenity Consultatior	n Responses
	<ul> <li>designations should be scoped out of the SLVIA as A&amp;B Council consider significant effects on these landscapes to be unlikely:</li> <li>National Scenic Areas;</li> <li>Areas of Panoramic Quality;</li> <li>Wild Land Areas.</li> <li>However, A&amp;B Council recommended consultation with SNH to confirm these omissions.</li> <li>A&amp;B Council also stated that in determining the proposal's visual impact, the proposal requires to be assessed from key viewpoints and information provided in sufficient detail to allow informed evaluation of the proposals. Visually sensitive viewpoints include those where there may be views to, or from designated landscapes; however, sensitivity is not confined to designated interests. Visually sensitive viewpoints can include those which are frequently visited by people (such as well-used transport corridors, ferries, tourist roads or picnic spots), settlements where people live, other inhabited buildings or viewpoints which have a landscape value that people appreciate (and which they might visit for recreational pursuits such as hill walking, cycling or education).</li> <li>A&amp;B Council also accepted, subject to finalisation nearer the point of the preparation of the SLVIA, the cumulative context as stated in the scoping submission.</li> <li>A&amp;B Council raised concerns regard potential reliance in the SLVIA on the screening effect of coniferous forest cover.</li> </ul>	assessment. It was agreed with SNH and A&B Council that it was impracticable to model or assess forest plans along the entirety of the IPA. The SLVIA assesses landscape and visual effects in respect of the current baseline and makes comment on the potential effects arising in locations where the felling of coniferous plantations may reasonably be expected to alter assessment findings.
Ardrishaig Community Council, 19 October 2017	It should be noted that the masts, so much taller than the existing ones, will make a much more significant impact on the immediate visual environment. Particularly in the area that runs parallel to the Crinan Canal, the greatest care should be taken to ensure that, as far as possible, the skyline is preserved, and the siting of the masts is decided with that as a priority.	Decisions regarding the alignment of the propose development are detailed in the routing study that accompanied the Scoping Request.
Mountaineer ing Council of Scotland, 23 October 2017	None	None.



## 4.3 Ecology and Nature Conservation

Table 5.1: Ecology and Nature Conservation Consultation Responses		
Consultee and Date	Issue Raised	Response/Action Taken
A&B Council, 3 November 2017	<ul> <li>A Construction Environment Management Plan (CEMP) should be drafted with an Ecological Clerk of Works (ECoW) on hand for advice and licensing if European Protected Species (EPS) are involved. Biosecurity protocols need to be included along with toolkit talks;</li> <li>There are a number of priority habitats, including upland woodlands of variable habitat types that need to be mapped according to access points for restoration, improvement and management (especially for invasive non- native species) plans can be drafted and implemented;</li> <li>Inclusions for sensitive ecological features: peatland habitats, wetland habitats, GWDTE, woodland in areas of ancient and semi-natural woodland, invasive non-native plant species, badger, otter, pine marten and bat species.</li> </ul>	CEMP to be drafted with standard pollution prevention guidelines, measures for management of invasive species, protection of species etc., with input and advice from ECoW. Habitats in ecological survey area mapped as part of Phase 1 habitat survey, with access points for proposed development. These access points would also be utilised for restoration, improvement and management. All included in impact assessment.
Marine Scotland Science, 24 August 2017	<ul> <li>A number of watercourses drain the proposed route of the overhead line (OHL) in which Atlantic salmon Salmo salar, trout and eel populations are present in a number of watercourses (Scottish Biodiversity List as priority species for conservation). Salmon are also listed under the European Habitats Directive for their conservation value, whilst European eel Anguilla anguilla is protected by European legislation (EC No 1100/2007). Some of the rivers within the proposed route of the OHL are currently categorised as a grade 3 and therefore a conservation plan is required;</li> <li>Advise the developer to be mindful of both the economic and conservation value of fish populations throughout the course of the development. Recommendation to contact the Argyll Fisheries Trust and Argyll District Fishery Board;</li> <li>Encourage the developer to adopt the following mitigation measures:         <ul> <li>(a) avoiding in-stream works during the salmonid spawning period from October</li> </ul> </li> </ul>	All towers to be located a minimum of 30 m from watercourses to avoid effects. A CEMP to be produced with standard pollution prevention guidelines. No responses to the Scoping Report were received from the Argyll Fisheries Trust All towers to be located a minimum of 30 m from watercourses to avoid effects



Table 5.1: Ecology and Nature Conservation Consultation Responses		
	<ul> <li>(b) ensuring that the design of watercourse crossings considers fish migratory requirements; and</li> <li>(c) avoiding the dismantling of material onto riparian vegetation; the latter is an important form of fish habitat cover and food supply.</li> </ul>	
Royal Society for the Protection of Birds, 30 August 2017	<ul> <li>Priority Habitat Enhancement: To deliver both for biodiversity and wider public benefits we advise that mitigation and enhancement should be applied where the proposed overhead line would generate impacts on priority habitats, especially ancient woodland and peatland;</li> <li>Any peatland impacts should be mitigated through improving habitat condition elsewhere in Argyll through contributing to the National Peatland Plan<sup>8</sup>.</li> </ul>	Effects would be present in ancient woodland due to habitat loss. Mitigation applied includes compensatory native tree planting to enhance existing ancient woodland areas. No significant peatland effects are considered to occur.
Forestry Commission Scotland, 07 September 2017	• Consideration needs to be given on the implications of felling operations on habitat connectivity.	See Section 5.4.1: Construction Effects
Scottish Natural Heritage, 13 September 2017	<ul> <li>There appears to be some confusion in the report as to the relationship between some of the designated areas. In particular, Tarbert Woods Special Area of Conservation (SAC) is a designation made up of four component parts. Artilligan and Abhainn Srathain Burns Site of Special Scientific Interest (SSSI) and Glen Ralloch to Baravalla Woods SSSI are two component SSSI's within that SAC. Table 5.1 (Statutory Designated Sites (non- avian Ecology) within 1 km of Proposed Development) shows Tarbert Woods SAC and Glen Ralloch to Baravalla Woods SSSI having different impacts, for instance, when they should align.</li> </ul>	Naming and effects adjusted, where relevant.
Scottish Environment Protection Agency, 08 November 2017	• The applicant should submit, as part of an application for planning permission, a map (or maps) showing clearly the locations of all proposed infrastructure and excavations, overlain with the locations of groundwater abstractions and GWDTE, along with relevant buffer zones (LUPS-GU31, section 2 <sup>9</sup> );	The applicant has proposed that this information will be submitted after planning permission is granted (ref. 1, item 25). The reason for this is that the information will only be available once the final locations of towers have been agreed. A general map

<sup>&</sup>lt;sup>8</sup> http://www.iucn-uk-peatlandprogramme.org/sites/www.iucn-uk-peatlandprogramme.org/files/Scottish%20National%20Peatland%20Plan.pdf [07/12/17]

<sup>&</sup>lt;sup>9</sup> https://www.sepa.org.uk/media/143868/lupsgu31\_planning\_guidance\_on\_groundwater\_abstractions.pdf [07/12/17]



Table 5.1: Ecology	and Nature Conservation Consultation Respo	nses
•	A copy of the form at Appendix 2 of LUPS-GU31 must be completed by the applicant and submitted with the supporting information set out below. Completion of this form confirms that the applicant has assessed the information provided to us;	of potential GWDTE locations within the LOD has been provided as Figure 5.4.
•	We request that the developer submit maps showing clearly: a) all proposed infrastructure, including temporary works;	
	<ul> <li>b) overlain with details of the extent and depths of all proposed excavations (excavations should also include all insertions and foundations);</li> <li>c) overlain with groundwater</li> </ul>	
	abstractions and GWDTE; and d) showing the relevant specified buffer zones (100m and 250m).	
•	If the map shows that any part of the limits of deviation (LOD) of tower positions is within 250 m of a groundwater abstraction, SEPA will object on the basis of lack of information unless either: a) The limit of deviation is curtailed at 250m from the groundwater abstraction, or	A bespoke risk assessment has been carried out.
	b) bespoke risk assessment is carried out in accordance with option 4 of LUPS- GU31	

## 4.4 Ornithology

Table 6.1: Ornithology Consultation Responses		
Consultee and Date	Issue Raised	Response/Action Taken
Royal Society for the	• Recommend upgrades to follow existing line routes as much as possible to minimise any new disturbances.	The routeing process is discussed in Chapter 3: Route Selection and Alternatives.
Protection of Birds, 30 August 2017	• The proposed overhead line intersects sensitive areas with the potential to impact on bird species and habitats of conservation concern, particularly raptors, divers and oak woodlands. It is critical that detailed survey work is undertaken to inform the Environmental Impact Assessment (EIA) and enable appropriate mitigation to be identified.	The survey work undertaken is described in section 6.2 of this Chapter. Results are discussed in section 6.2.7 of this Chapter.



Table 6.1: Ornithology Consultation Responses		
	• There are concerns in regards the route option C between NR971992 and NR864894 due to potential impacts on species of eagle and diver species. Advise that if areas of the line show heavy usage that these are avoided by re-routing. To consider the potential impacts and any necessary mitigation in relation to the following protected and high priority bird species and habitats: Raptors, Diver species, Greenland White- fronted geese, Black Grouse.	Flight activity surveys have been completed for eagle species and divers, detailed in this chapter in section 6.2, sub-section 6.2.7 Current Baseline. Potential impacts addressed in this Chapter, Section 6.4 Mitigations sub-section 6.4.2 Mitigation During Operation.
	• Due to the presence of SPAs for Greenland white-fronted geese, golden eagle and black-throated diver the requirement for a Habitat Regulations Appraisal should be considered.	Detailed in section 6.8: Habitat Regulations Screening.
	• Any works that require vegetation removal should be either conducted before the breeding season (i.e. before March) or checked prior to work. If birds are found, works will need to be timed to prevent disturbance. A detailed breeding bird protection plan should be drawn up in advance of operations commencing and agreed with RSPB and SNH.	Detailed in this chapter under the section 6.4 Mitigations sub-section 6.4.1 Mitigation During Construction.
	• Where applicable, the overhead lines should be made more visible either by markers or by the use of thicker coloured line sheathing. This will require a condition to ensure that markers are regularly maintained.	Detailed in this chapter under the section 6.4 Mitigations sub-section 6.4.2 Mitigation During Operation.
	• If helicopters will be required then a flight plan showing routes should be drawn up in advance of any works. The plan should establish set flight corridors which will not cause disturbance to Annex 1 species particularly raptors and divers species.	The access strategy for construction is described in Chapter 2: Description of the Proposed Development.



## 4.5 Cultural Heritage

Consultee and Date	Issue Raised	Response/Action Taken
Historic Environment Scotland, 22 September 2015	<ul> <li>HES raised concerns about the potential impact of the proposed development on the settings of two Scheduled Monuments, one Category A Listed Building, three GDL, one Conservation Area, and one Promoted Monument within the surrounding area (see below).</li> <li><u>Scheduled Monuments</u></li> <li>Auchoish Chambered Cairn (SM173)</li> <li>Loch Glashan Dun (SM10871)</li> <li><u>Listed Buildings</u></li> <li>Inveraray Castle (LB11552)</li> <li>Inventory status Gardens and Designed Landscapes</li> <li>Inveraray Castle (GDL223)</li> <li>Crarae Garden (GDL118)</li> <li>Stonefield Castle Hotel (GDL350)</li> <li><u>Conservation Areas</u></li> <li>Auchindrain (CA459)</li> <li><u>Promoted Monument</u></li> <li>Neil Munro Monument (3402420)</li> </ul>	Noted Issues raised by HES taken into consideration at design stage The indirect impacts of the proposed development or these heritage assets are assessed in Section 7.7. A lis of cultural heritage visualisations is provided in Technical Appendix 7.2.
Historic Environment Scotland, 21 July 2017	HES confirmed that they were happy that their earlier comments regarding the proposed development appear to have been taken into account during the finalising of the route corridor.	Noted
	HES welcomed that the proposed route alignment through Inveraray Castle GDL has taken account of views from the Category A Listed Inveraray Castle and its associated Inventory GDL and that the alignment has reduced the impact on the views from the castle.	Noted
	HES welcomed that the selected proposed route alignment passing Auchoish Long Cairn (SM173) has avoided skylining of the towers in views from the burial cairn.	Noted
	HES raised concerns about the location of the proposed crossing of the Crinan Canal (SM6501 & Conservation Area) and noted that the crossing location as proposed at that time appeared to be in an area of the canal with relatively little modern intervention. Requested that further information about the proposed location of the OHL towers in relation to the canal be provided along with draft visualisations.	A series of visualisations (photomontage) from representative locations of the predicted views of the proposed development from the Crinan Canal and in the area surrounding the canal to the north of Lochgilphead are included in the EIA. Viewpoints 7,8,9,10, and 11 include a range of views both from the canal and of the canal (see Figure 4.5 in Volume 3a). Visualisations are provided in



Table 7.1: Cultural Heritage Consultation Responses		
		Volume 3b of the EIA Report (see Figure 4.13 – Figure 4.17). The indicative locations of the proposed towers, either side of the canal, are shown on Figure 4.14 (LVIA Viewpoint 08).
Historic Environment Scotland, 21 August	HES confirmed that they were content with the scope of assessment set out in the Scoping Report and welcomed the inclusion of a number of cultural heritage viewpoints.	Noted
2017	HES reiterated their advice that there is potential for significant impacts on Scheduled Monument Crinan Canal, Cairnbaan - Ardrishag (SM6501) from the proposed development, stating that the level of impact will to some extent be dependent upon the locations of the towers, and requested that a visualisation showing the proposed OHL where it crosses the Crinan Canal should be included in the assessment.	The potential impacts of the proposed development on the monument are assessed in Section 7.7. LVIA Viewpoints 7, 8, 9, 10, and 11 include a range of views both from the canal and of the canal (see Figure 4.5 in Volume 3a). A visualisation (photomontage) of the predicted views of the proposed development from Crinan Canal close to the point where the OHL would cross the canal is provided in Figure 4.14 (LVIA Viewpoint 08).
West of Scotland Archaeology Service, 31 August 2017	WoSAS expressed concern that the walkover survey of the proposed development would exclude any areas of dense forestry and suggested that consideration be given to whether other survey techniques, such as LiDAR, would offer the opportunity to identify the survival of upstanding features in areas that are under tree cover.	Noted Proposed pre-construction mitigation is set out in Section 7.5.
	WoSAS highlighted the possibility that the proposed development may cross through the boundaries of a former medieval hunting park established by Robert the Bruce in the vicinity of Tarbert. They advised that the precise location and extent of the park is not known but suggest that it may be located in the area to the south/south- west of the village and it is possible that remnants of the park could still remain identifiable in the landscape.	Noted Full desk-based assessment and reconnaissance field survey were carried out for the proposed 275 kV OHL LOD where it crosses the potential deer park location. Details of the heritage assets identified within the proposed 275 kV OHL LOD are provided in Technical Appendix 7.3.
	WoSAS confirmed that they were content with the 10km study area for assessment of potential impacts on the setting of heritage assets in the wider landscape.	Noted
	WoSAS advised that the assessment of potential impacts of the proposed development on the setting of heritage assets should include sites considered to be of potentially-schedulable quality.	Noted The indirect impacts of the proposed development on these heritage assets are



Table 7.1: Cultural Heritage Consultation Responses		
		assessed in Section 7.7. A list of cultural heritage visualisations is provided in Technical Appendix 7.2.
Argyll and Bute Council, 31 October 2017	The Council reiterated the concern WoSAS expressed regarding the exclusion of dense forestry from the walkover survey and suggestion that consideration be given to whether other survey techniques, such as LiDAR, would offer opportunity to identify the survival of upstanding features in areas that are under tree cover.	Noted Proposed pre-construction mitigation is set out in Section 7.5.
Forestry Commission Scotland, 31 October 2017	Highlighted that Inveraray Castle Garden and Designed Landscape (GDL) is considered to be one of the most grandly conceived and culturally significant designed landscapes in Scotland and that the woodland plantations of the GDL are recognised as a key component of the estate landscape and contributing towards the visual experience of the GDL. Raised concerns that should the proposed development be routed through the Inveraray Castle GDL it will have a detrimental effect on the recognised scenic and woodland qualities of the designed landscape.	Following consultation with Forestry Commission and Argyll Estates the proposed development has been re- routed so as to avoid the heritage trees within Balantyre Wood and the majority of the heritage woodland within Inveraray Castle GDL; minimising woodland felling required along the route of the proposed development where it crosses the GDL. The indirect impacts of the proposed development on Inveraray Castle GDL and associated buildings/features are assessed in Section 7.7.3: Operational Effects.
Forestry Commission Scotland, 30 November 2017	The Forestry Commission Scotland reiterated their concerns of the potential negative impact of the felling of heritage trees within the proposed development corridor on Inveraray Castle Garden and Designed Landscape (GDL) and the potential negative impact the proposed felling may have on views of the wooded landscape within the GDL from the important view point at Dun na Cuiache Watch Tower (LB11543).	Following consultation with Forestry Commission and Argyll Estates the proposed development has been re- routed so as to avoid the heritage trees within Balantyre Wood and majority of the heritage woodland within Inveraray Castle GDL; minimising woodland felling required along the route of the proposed development where it crosses the GDL. The indirect impact on Dun na Cuiache Watch Tower (LB11543) is assessed in Section 7.7.3: Operational Effects.



#### 4.6 Traffic & Transport

Table 8.1: Traffic & Transport Consultation Responses		
Consultee and Date	Issue Raised	Response/Action Taken
A&B Council Area Roads,	Routes to be used to be inspected and the condition recorded prior to use.	Noted – assumed this would be secured by a condition of consent
6 September 2017	Requires a Traffic Management Plan detailing access routes for specific deliveries, number, volume, schedule of all vehicle movements	Noted – assumed this would be secured by a condition of consent
	Requires a traffic impact assessment of project on public road network and proposals to mitigate against adverse effects.	Traffic Impact Assessment set out in Section 8.4 of this Chapter
	Requires a code of practice for on-site and delivery drivers.	Code of Practice set out in Traffic Management Plan with further information in Section 8.5 of EIA Report Chapter 8.
Transport Scotland, 25 August 2017	Agree the approach proposed for the assessment set out in the Scoping Report. No additional issues raised.	Noted

## 4.7 Amenity & Heath – Noise

A scoping stage assessment of the likely effects from noise on NSRs was made based on conservative assumptions. The possibility of NSRs experiencing an effect due to noise from the proposed development was identified for those NSRs located within 300 m of the OHL, during the construction, operation and decommissioning phases. A total of 100 NSRs were identified within this search radius, and are shown in Figure 9.1. The responses received as part of the Scoping Opinion<sup>10</sup> do make reference to the proposed scope of the noise assessment.

## 4.8 Amenity & Heath – Residential Visual Amenity

Consultee and Date	Issue Raised	Response/Action Taken
Scottish Natural Heritage, 13 September 2017	SNH noted that residential visual amenity effects on private views from individual dwellings/ groups of dwellings would be addressed in a separate section on Amenity and Health. Given the scattered nature of settlement in Argyll, the ES [ <i>sic</i> ] should explain how this will be fed back into the SLVIA.	It is important to note that the assessment of residential visual amenity is separate and distinct from the assessment of visual effect (including on settlements) as covered in the assessment of landscape and visual effects contained in Chapter 4 Seascape/Landscape and Visual Effects.

<sup>&</sup>lt;sup>10</sup> Scottish Government (2017) Energy Consents Unit, Scoping Opinion on behalf of the Scottish Ministers Under Part 4 of the Electricity Works (Environmental Impact Assessment)(Scotland) Regulations 2017. Issued to Scottish Hydro Electric Transmission plc, Inveraray to Crossaig 275 kV Overhead Line Reinforcement. 20 December 2017.



## 4.9 Forestry

Consultee and Date	Issue Raised	Response/Action Taken
Forestry Commission Scotland, 07 September 2017	Generic comments on Scottish governments Policy on the Control of Woodland Removal and the structure of the required reporting. Comments on Woodland management and tree felling.	Commitment to address Policy on woodland removal and to support individual landowners in addressing their future woodland management post the introduction of the OHL.
Forestry Commission Scotland, 13 November 2017	Follow up email to confirm discussions between the application, FCS, FCS Conservancy and SNH on heritage/ landscape issues associated with the OHL alignment through Balantyre Wood, noting the presence of 'heritage trees'. This email attached advice from the FCS landscape and heritage advisor (dated 31/10/2017) provided in relation to the potential for effects as a result of removal of trees within the Inveraray Castle GDL. The advice raised concerns regarding potential for effects on scenic and woodland quality of the designed landscape and for this to be in conflict with policy on the Control of Woodland Removal.	The applicant has provided a comprehensive assessment of potential effects on the scenic qualities of the GDL in Chapter 4: Landscape and Visual, and the Cultural Heritage qualities in Chapter 7: Cultural Heritage. The rationale for the alignment selection is summarised in Chapter 3: Route Selection and Alternatives. The alignment has subsequently been altered to avoid potential impacts on exotic specimen trees. The effects in the context of the Control of Woodland Removal Policy are considered in this chapter.
Forestry Commission Scotland, 13 November 2017	FCS expect that UKFS compliant design should be considered as good practice rather than mitigation. FCS are not comfortable that forest design aspects are left until post-consent stage (i.e. secured by condition). The email noted that the FCS Scoping response states that 'Design approaches which reduce the scale of felling required to facilitate the development should be considered and integration of the development with the existing woodland structure is a key part of the consenting process'. It also states that landscape impact should be considered at a local and regional level.	The applicant has provided an assessment of potential landscape effects associated with forestry/woodland removal in Chapter 4: Landscape and Visual. While it is noted that FCS expect to see UKFS compliant design, the applicant notes that only the felling for the operational corridor and access tracks is considered under the s37 application process. As such, this chapter is focussed on the felling for the operational corridor and access tracks. Additional felling required to restructure woodland and provide landscape mitigation would need to be secured through the agreement of individual woodland owners and the Forestry commission to the proposed variations to the existing Forest Management plans for each forest property. A response to this email was provided by the applicant on 16/11/2017.



Table 11.1: Fo	restry Consultation Responses	
Forestry Commission Scotland, 30 November 2017	Email consolidating earlier comments (31/10/2017 and 13/11/2017). On route alignment FCS request the applicant reconsiders the balance of constraints for the Balantyre Wood. On native woodland felling, FCS requests that consideration is given to a reducing/avoiding the need for felling, taking account of the growth habit of native trees. On Woodland Impact Assessments (WIAs), FCS noted the potential need for further meetings and site discussions to agree the plans.	The applicant has revisited the balance of constraints for the Balantyre Wood section following further consultation with SNH, FCS, HES and the landowner. The alignment has subsequently been amended to avoid the potential for impacts on exotic specimen trees. It is noted that to provide a 'worst case' scenario, the assessment in this chapter considers the operational corridor in native woodland to be up to 80 m in width. It is noted in the mitigation section that the applicant will seek to significantly reduce the requirement for felling in these areas through the detailed WIAs. The applicant is committed to continuing dialogue with FCS on the development of the detailed WIAs.
Forestry Commission Scotland, 30 November 2017	Email response to applicant clarifications provided on 16/11/2017. This email confirms that FCS agree that the EIA Report will provide an assessment of the tree felling for the operational corridor (as required under the s37 application); and, additional felling for woodland restructuring and landscape mitigation will be developed as part of the Woodland Impact Assessments to support separate felling licenses.	This chapter considers the tree felling required for the operational corridor and access tracks as part of the application for consent under s37 of the Electricity Act 1989. The remainder of the felling would be subject to separate felling licences. Individual WIAs for each forest ownership are under development but are not included in the scope of this EIA Report.

## 4.10 Existing Infrastructure

The section between Towers 85 to 91 was realigned to be consistent with the buffer distance SSEN provided between the proposed alignment and the Freasdail wind turbines. The alignment in the Scoping Report did not provide sufficient buffer distance to the consented wind turbines in A'Chruach wind farm, phase 2. The realignment is with the 100m Limit of Deviation (LOD) identified in the Inveraray to Crossaig 275 kV Scoping Report, August 2017, prepared by SHE Transmission, which is available at the project website https://www.ssen-transmission.co.uk/projects/inveraray-crossaig/.



## PROPOSED ALIGNMENT AND NEXT STEPS

#### 4.11 Summary Proposed Alignment

4.11.1 The Proposed Alignment is illustrated by Figure 1.1 in the Annex to this document.

#### 4.12 Next Steps

#### EIA Report and Application for Consent

- 4.12.1 The Proposed Alignment will be included in an application for consent under section 37 of the Electricity Act 1989, accompanied by the EIA Report, containing a detailed environmental assessment.
- 4.12.2 The application for consent under section 37 of the Electricity Act 1989 will be made to Energy Consents Unit (ECU) of the Scottish Government. This application will be made in July 2018 and will be available to view at http://www.energyconsents.scot/ and on the on the project website at https://www.ssen-transmission.co.uk/projects/inveraray-crossaig/.
- 4.12.3 The Energy Consents Unit can be contacted:

By Email: Econsents\_Admin@gov.scot

By Post:

Energy Consents Unit
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

#### Comments

4.12.4 Comments on this document should be sent to:

By Email to: kelly.scott@sse.com

By Post, for the attention of:

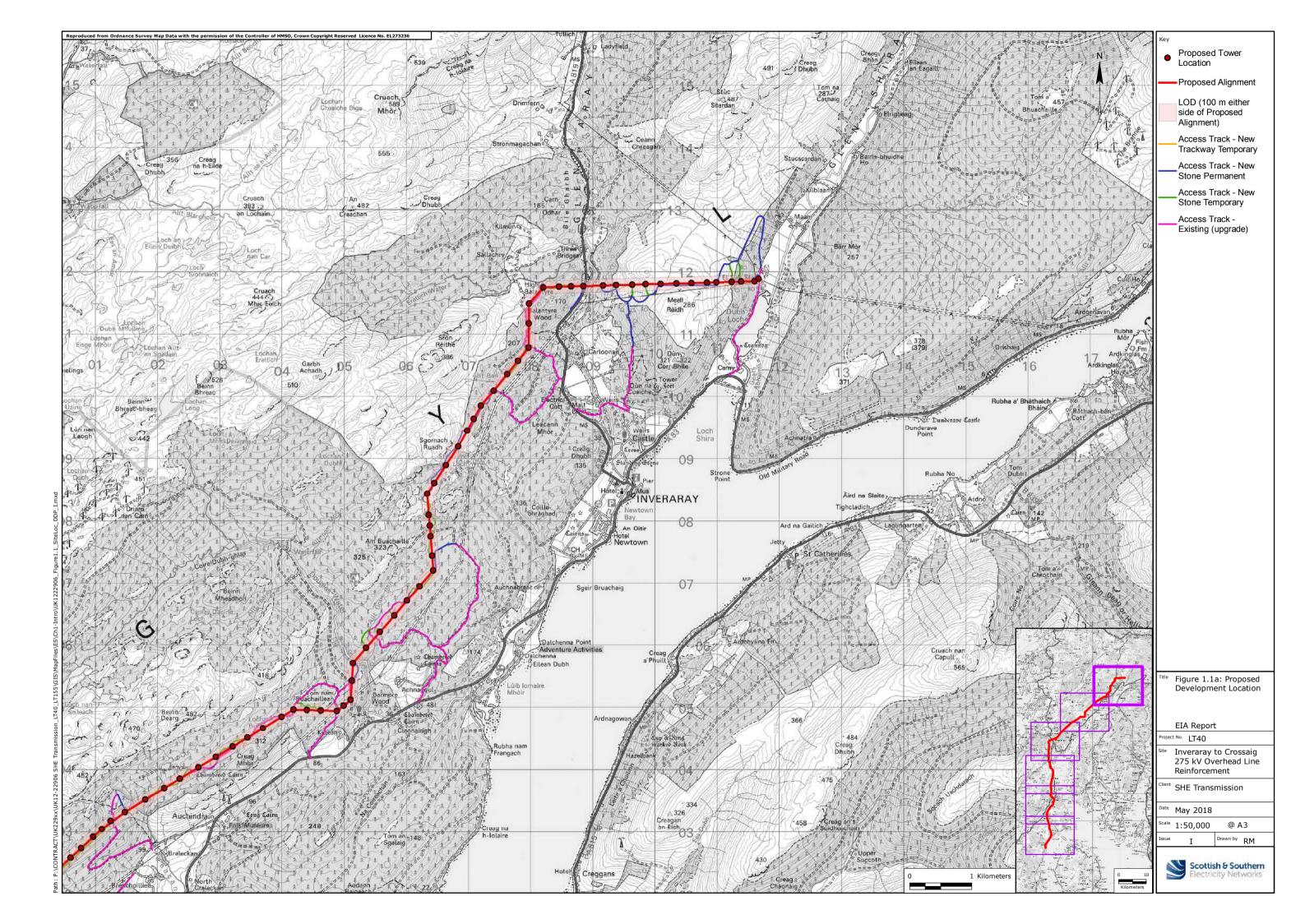
Kelly Scott SHE Transmission 1 Waterloo Street Glasgow G2 6AY

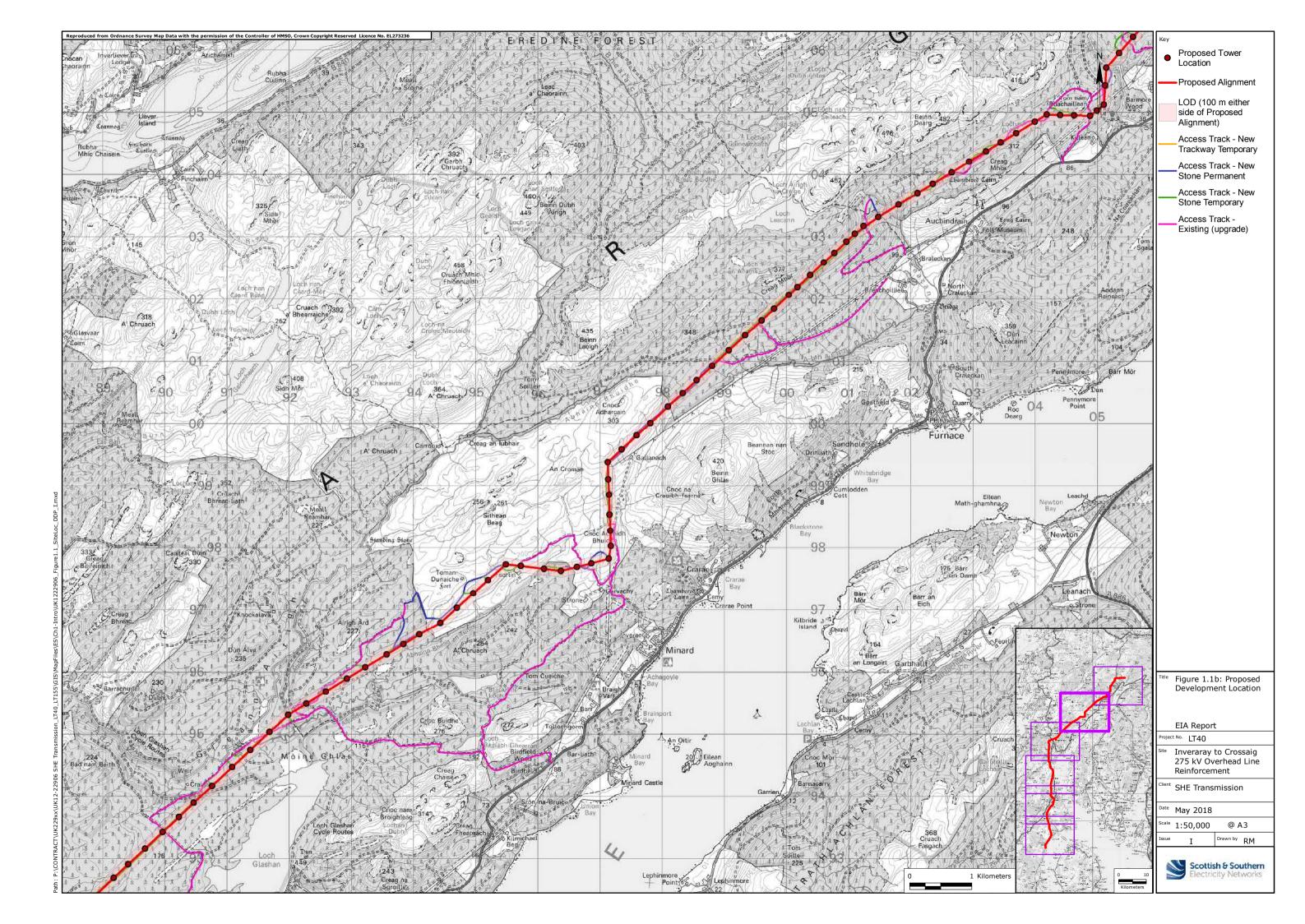
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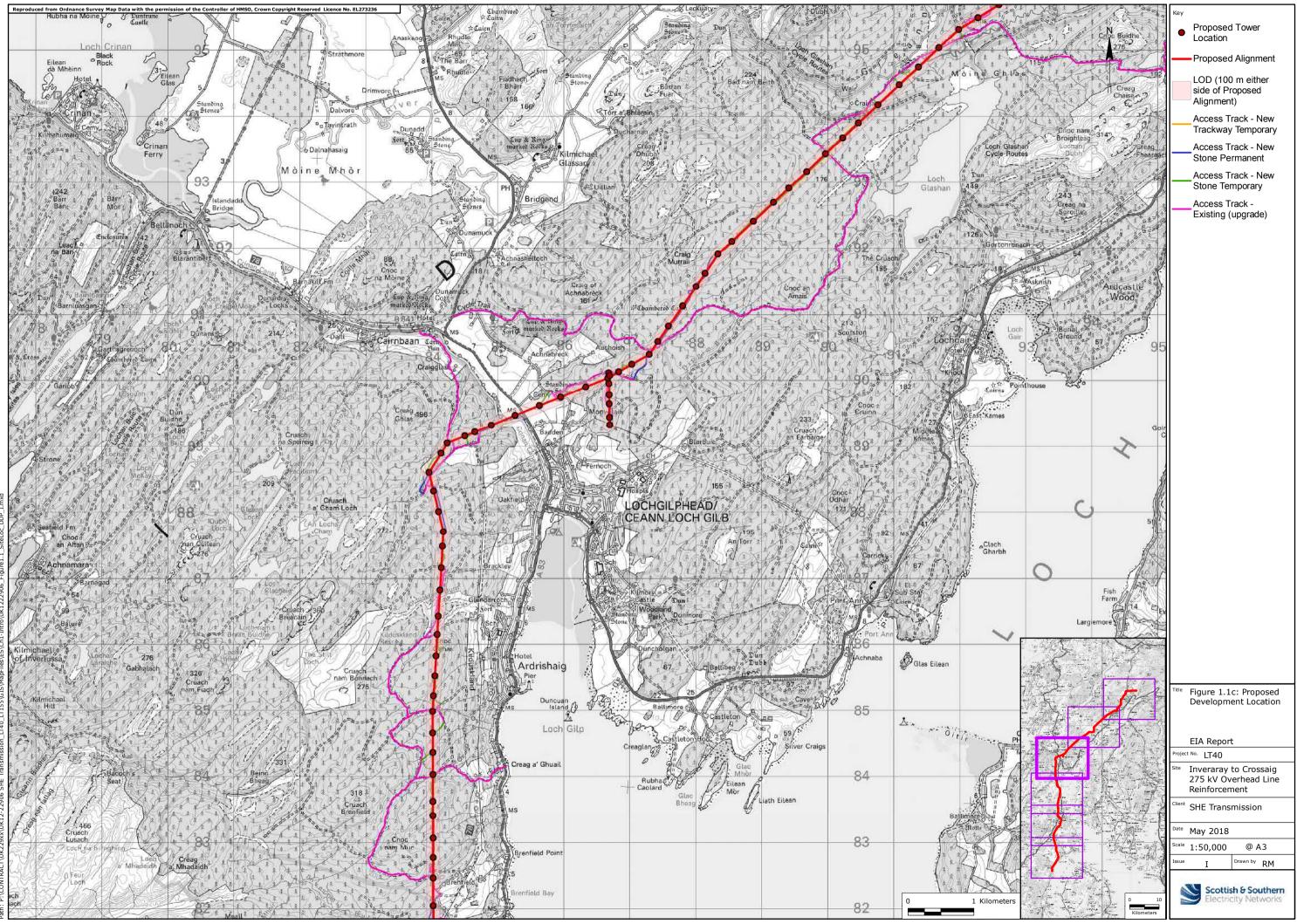
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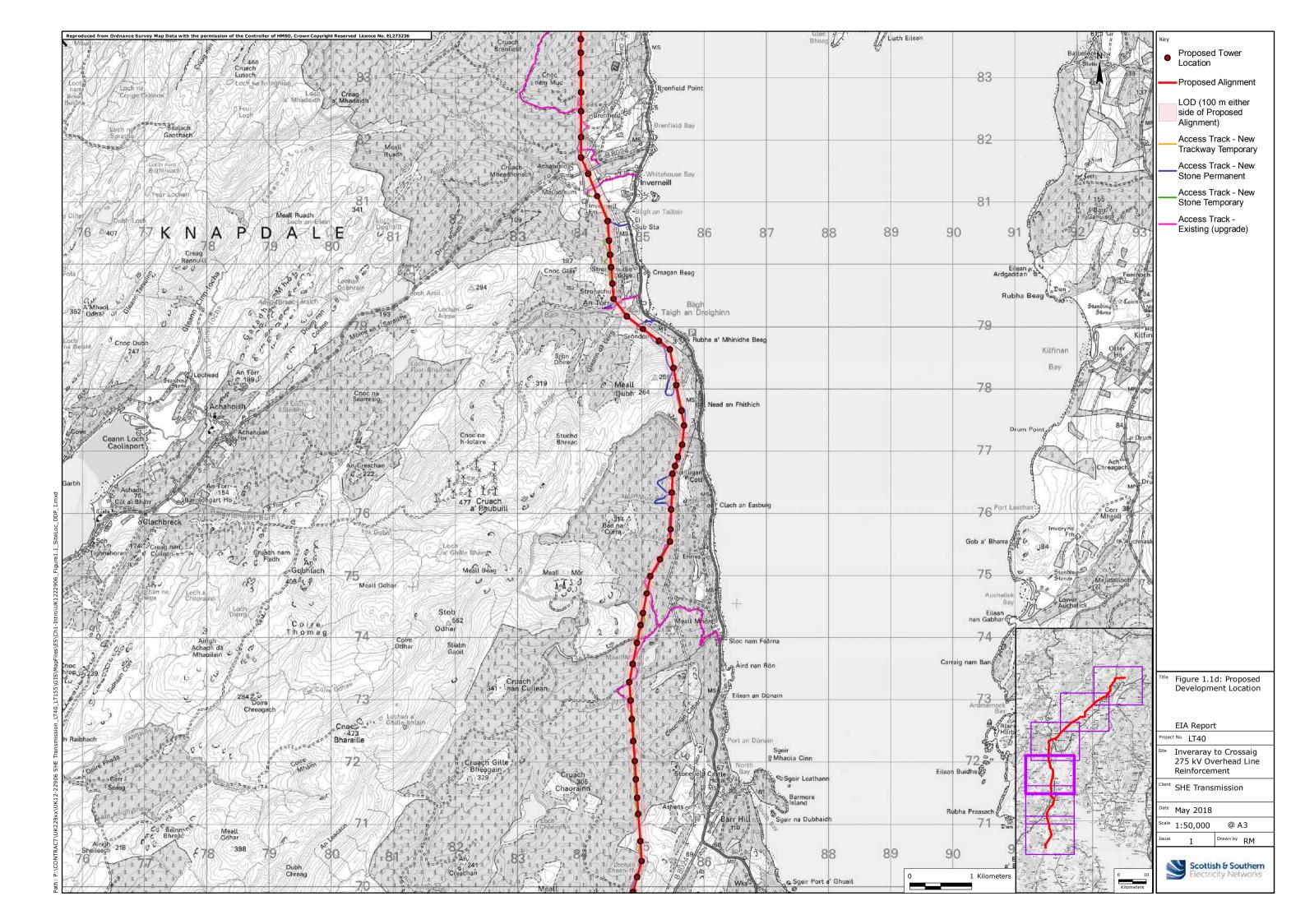
## **ANNEX A: FIGURES**

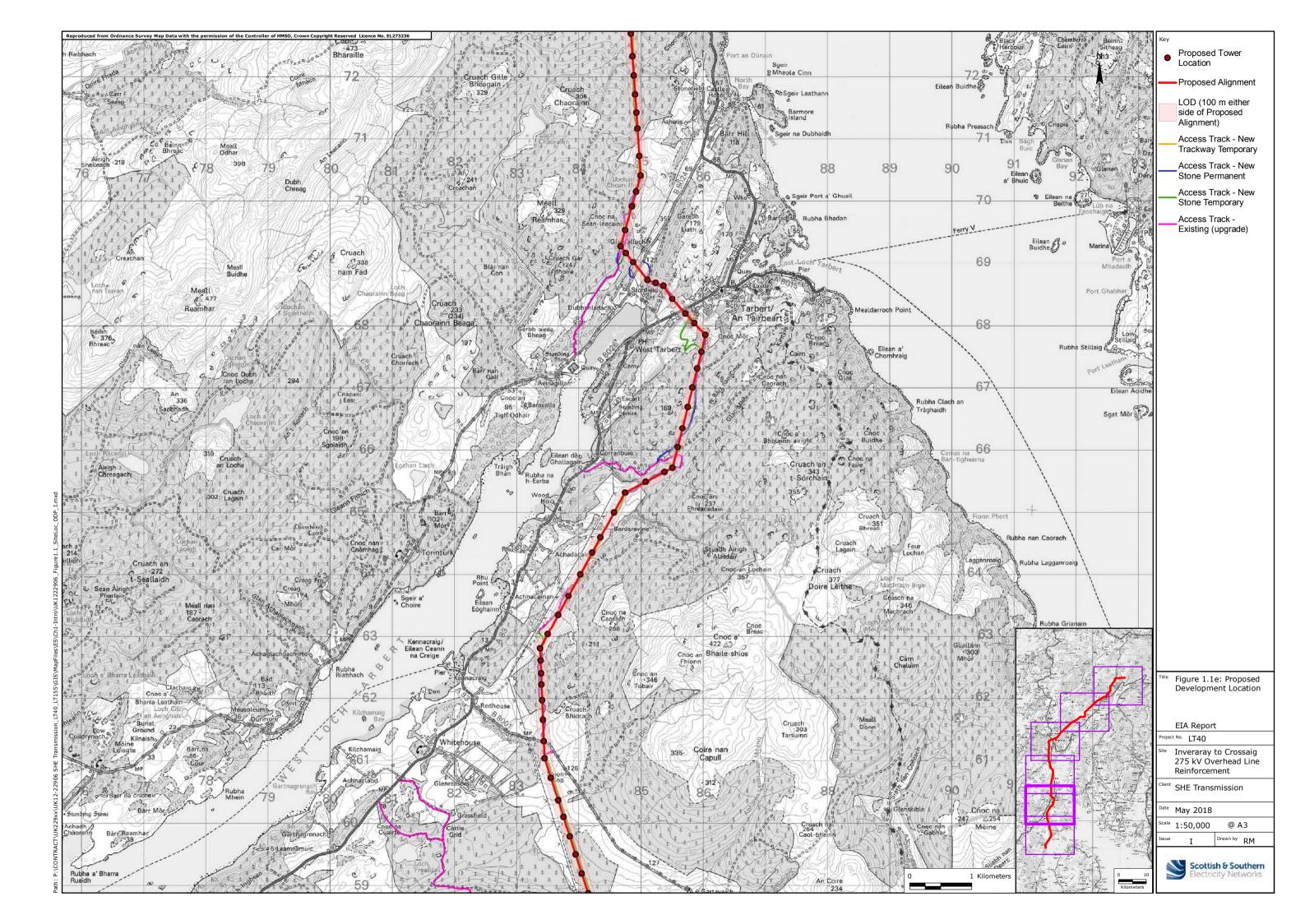


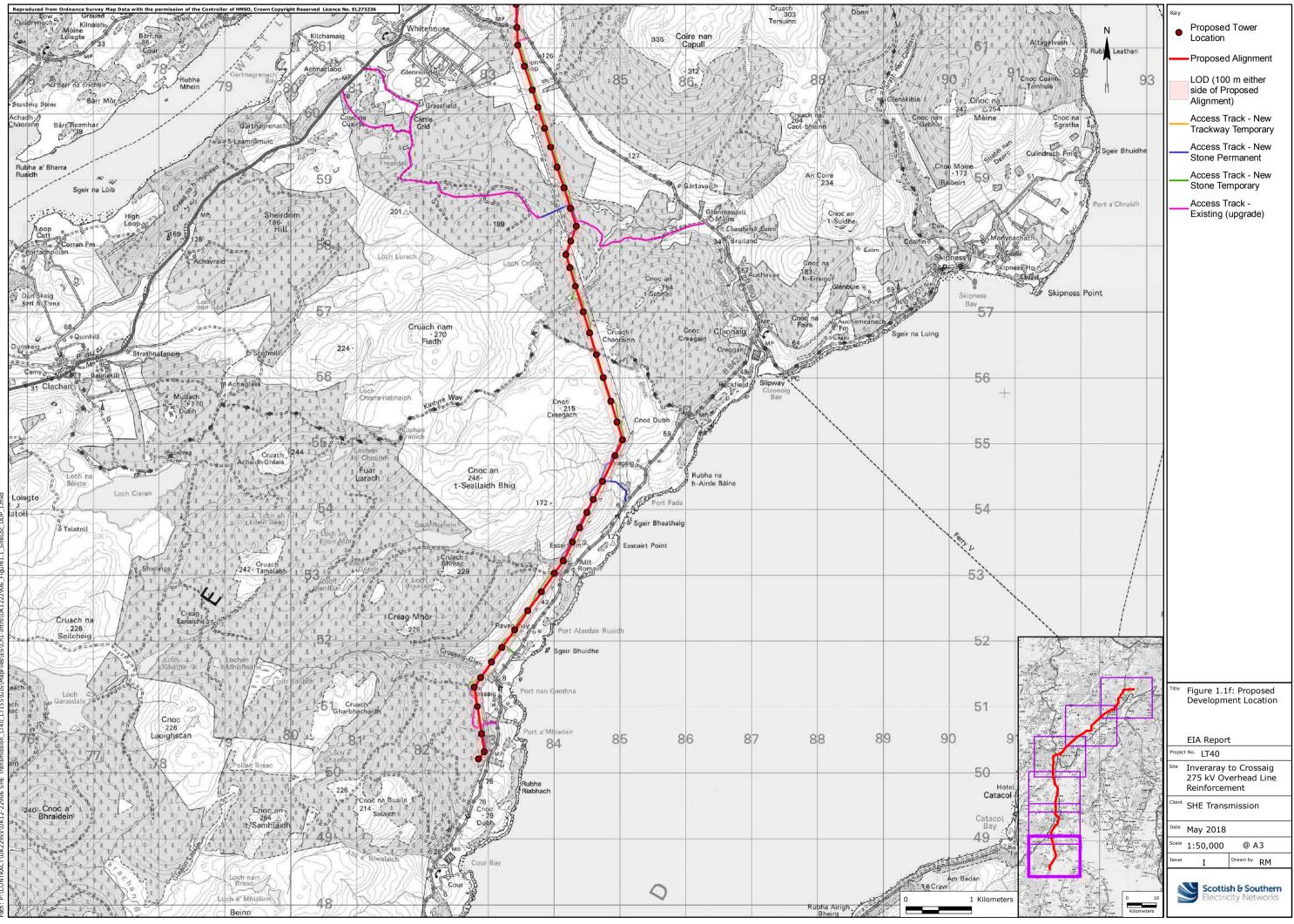




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