Scottish & Southern Electricity Networks

TRANSMISSION

Report on Consultation (Route Options)

Loch Kemp Storage Scheme 275 kV Grid Connection

May 2025

REF: LT366

Scottish & Southern Electricity Networks
TRANSMISSION

CONTENTS

Figures

GLOSSARY

Term	Definition
Amenity	The natural environment, cultural heritage, landscape and visual quality. Also includes the impact of SSEN Transmission's works on communities, such as the effects of noise and disturbance from construction activities.
Ancient Woodland Inventory (AWI)	The Ancient Woodland Inventory (AWI) is a provisional guide to the location of Ancient Woodland. It contains three main categories of woodland, all of which are likely to be of value for their biodiversity and cultural value, by virtue of their antiquity: Ancient Woodland (1a and 2a); Long-established woodlands of plantation origin (LEPO) (1b and 2b); and other woodlands on 'Roy' woodland sites.
Biodiversity Net Gain (BNG)	A process intended to leave nature in a better state than it started, using good practice principles established by the Business and Biodiversity Offset Programme (BBOP) and organisations including, but not limited to, Construction Industry Research and Information Association (CIRIA), Chartered Institute of Ecology And Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA).
Consultation	The dynamic process of dialogue between individuals or groups, based on a genuine exchange of views and, normally, with the objective of influencing decisions, policies or programmes of action.
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.
Construction Corridor	A linear corridor required to enable the safe construction of the underground cable (UGC). A construction corridor for this UGC is anticipated to be approximately 30 m wide but may vary in width along its length.
Environmental Appraisal (EA)	When a Proposed Development is unlikely to give rise to significant environmental effects, and is not considered an Environmental Impact Assessment (EIA) development, which would not be subject to an EIA and the preparation of an EIA Report. In this circumstance, an optional Environmental Appraisal EA detailing the results of surveys, and any appropriate mitigation, can accompany a consent application.
Environmental Impact Assessment (EIA)	A formal process codified by EU directive 2011/92/EU, and subsequently amended by Directive 2014/52/EU.
Habitat	Term most accurately describing the place in which a species lives, but is also used to describe plant communities or agglomerations of plant communities.
Horizontal Directional Drilling (HDD)	A drilling technique used to install underground cables (UGC) without the need for traditional trenching. HDD involves drilling a pilot hole along a desired path, expanding it, and then pulling the UGC through the enlarged borehole.
Joint Bay	Joint bays are installed below ground and allow for joining different sections of the cables at pre-determined intervals (depending on manufactured length of cable, constraints and space).
Kilovolt (kV)	One thousand volts. Volts: The international unit of electric potential and electromotive force.
Listed Building	A building included on the list of buildings of special architectural or historic interest, which is afforded statutory protection under the 'Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997' and other planning legislation. Classified categories A – C(s).
Micrositing	The process of positioning infrastructure to avoid localised environmental or technical constraints.

Term	Definition
Mitigation	Term used to indicate avoidance, remediation or alleviation of adverse impacts.
Operational Corridor (OC)	A linear corridor required to enable the safe operation and maintenance of an operational underground cable (UGC). An OC for an UGC would typically be 20 m, although the width of the OC could vary depending on the land use including type of woodland (based on species present) in proximity to the UGC.
Plantation Woodland	Woodland of any age that obviously originated from planting.
Point of Connection (PoC)	The location where a new electricity supply network is connected to an existing one.
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 or underground cable 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 routeing process.
Routeing	The work undertaken which leads to the selection of a proposed alignment.
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.
Sites 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.
Special Area of Conservation (SAC)	An area designated under the European Commission (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 74/409/EEC), to protect important bird habitats. Implemented under the Wildlife and Countryside Act 1981.
Special Landscape Area (SLA)	Landscapes designated by the Local Planning Authority which are considered to be of regional/local importance for their scenic qualities.
Stakeholders	Organisations and individuals who can affect or are affected by SSEN Transmission works.
Study Area	The area within which the Corridor, Route and Alignment study takes place.
The National Grid	The electricity transmission network in Great Britain.
Underground Cable (UGC)	An electric cable installed below ground, protected by insulating layers and marked closer to the surface, to prevent accidental damage through later earthworks.
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 (OHL) or Underground Cable (UGC) is to be constructed, and SSEN Transmission.

PREFACE

This Report on Consultation has been prepared by ASH design+assessment Ltd. (ASH) on behalf of Scottish Hydro Electric Transmission plc ("the Applicant") who, operating, and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission), owns, operates and develops the high voltage electricity transmission system in the north of Scotland and remote islands.

The project, referred to in this report as 'the Proposed Development', involves the installation of a new 275 kV underground cable (UGC) to connect the proposed Loch Kemp Storage Scheme ('the Scheme') to the National Grid at the existing Foyers Switching Station, within the Local Authority area of The Highland Council (THC).

This report provides a summary of the responses received from key stakeholders, including statutory and non-statutory consultees, local communities, landowners, and members of the public, during consultation between October 2024 and December 2025. in response to the route options identified for the Proposed Development, as set out in the Consultation Document[1]. A further consultation request was sent to the Stratherrick and Foyers Community Council in January 2025 with comments requested by 7 March 2025.

The Consultation Document and consultation materials were made available online at the project website: Loch Kemp Pumped Hydro Storage Scheme 275kV Grid Connection - SSEN Transmission.

This Report on Consultation describes how the feedback from consultation has informed the identification of a proposed route, to be taken forward to Stage 3 Alignment Selection of the Proposed Development.

[1] SSEN Transmission (October 2024). *Consultation Document (Route Options): Loch Kemp Storage Scheme 275 kV Grid Connection.* Available at: Loch Kemp Pumped Hydro Storage Scheme 275kV Grid Connection - SSEN Transmission [Last Accessed 23/05/2025].

EXECUTIVE SUMMARY

SSEN Transmission, operating under licence held by Scottish Hydro Electric Transmission plc, owns, operates and develops the electricity transmission system in the north of Scotland and remote islands and holds a license under the Electricity Act 1989 and has a statutory duty to develop and maintain an efficient, co-ordinated and economical system of electricity transmission. Therefore, SSEN Transmission has obligations to offer non-discriminatory terms for connection to the transmission system.

The proposed Loch Kemp Storage Scheme ('the Scheme'), being developed by Loch Kemp Storage Ltd on behalf of Statera Ltd, is a pumped hydro storage scheme located on the eastern bank of Loch Ness, with a potential capacity of up to 600 MW. The Scheme requires connection to the electricity transmission network at Foyers Switching Station.

This Report on Consultation documents the consultation process which has been undertaken for the Loch Kemp Storage Scheme 275 kV Grid Connection ('the Proposed Development') during the route options stage between October 2024 and March 2025. The programme of consultation was designed to engage with stakeholders, including statutory and non-statutory consultees, local communities, landowners, and members of the public in order to invite feedback on the route options under consideration.

The approach to route selection is informed by SSEN Transmission's guidance 'Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above', which provides a framework to ensure environmental, technical and economic considerations are identified and appraised at each stage of the routeing process.

Two route options were identified to form a potential connection between the proposed Point of Connection (PoC), and the existing Foyers Switching Station. The appraisal of route options, summarised in the '*Consultation Document (Route Options): Loch Kemp Storage Scheme 275 kV Grid Connection'* [1] in October 2024 ('the Consultation Document') considered technical, environmental and cost factors, prior to identifying a preferred route.

This report summarises the responses received, following consultation on the appraisal of route options, as shown in **Figure 1**, and, where relevant, provides detail on the actions proposed in response to the issues raised. Having considered the consultation responses received, SSEN Transmission confirm that the preferred route identified within the Consultation Document[1] above is to be taken forward as the proposed route to Stage 3 Alignment Selection of this Proposed Development . This route is considered to provide an optimum balance of environmental, technical, and economic factors. The proposed route option is shown on **Figure 2** of this report.

1. INTRODUCTION

1.1 Purpose of Document

1.1.1 This Report on Consultation has been prepared by ASH design+assessment Ltd. (ASH) on behalf of Scottish Hydro Electric Transmission plc ("the Applicant") who, operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission), owns, operates and develops the high voltage electricity transmission system in the north of Scotland and remote islands. In this Report on Consultation, the Applicant and SSEN Transmission are used interchangeably, unless the context requires otherwise.

1.1.2 This Report on Consultation documents the route option stage consultation process for the Loch Kemp Storage Scheme 275 kV Grid Connection ('the Proposed Development') between October 2024 and March 2025. The programme of consultation was designed to engage with key stakeholders, including statutory and non-statutory consultees, local communities, landowners and members of the public, in order to invite feedback on the route options identified within the '*Consultation Document (Route Options): Loch Kemp Storage Scheme 275 kV Grid Connection'*[1] '(the Consultation Document'), prior to identifying a proposed route to be taken forward to Stage 3: Alignment Selection of the Proposed Development, as shown in **Figure 1**.

1.1.3 This report summarises the responses received and details the actions taken in response to the issues raised.

1.2 Objectives

1.2.1 The objectives of this report are:

- To document the consultation process between October 2024 and March 2025;
- To summarise feedback received from stakeholders/consultees;
- To document actions undertaken in response to feedback where relevant; and
- To clearly set out how the proposed route has been informed by the consultation process.

1.3 Document Structure

1.3.1 This report is comprised of eight sections as follows:

1. Introduction - setting out the purpose of the Report on Consultation;
2. Project Overview – outlines the background to the Proposed Development and provides a description of the key elements;
3. Route Selection – summarises the route selection process;
4. The Consultation Process – describes the framework for consultation and methods which have been employed;
5. Consultation Responses from Statutory and Non-Statutory Consultees - summarises the responses from these bodies;
6. Community Consultation Responses – summarises responses received from the local community;
7. Identification of the Proposed Route – describes how the comments and issues raised during consultation have helped inform the identification of a proposed route; and
8. Conclusions and Next Steps – provides a summary of the conclusions reached and actions going forward.

2. PROJECT OVERVIEW

2.1 The Need for the Proposed Development

2.1.1 SSEN Transmission has a statutory duty under Schedule 9 of the Electricity Act 1989 to develop and maintain an efficient, co-ordinated and economical transmission system in its licenced areas. SSEN Transmission has obligations to offer non-discriminatory terms for connection to the transmission system.

2.1.2 The Loch Kemp Storage Scheme has a potential capacity of up to 600 MW and would require connection to the electricity transmission network at the existing Foyers Switching Station, by October 2030. The new connection would be routed between the proposed Point of Connection (PoC) and the existing Foyers Switching Station, as shown on **Figure 1**. The Foyers Switching Station was selected as the connection point for the Scheme, due to being the nearest connection point with adequate capacity on the wider network.

2.2 National Planning Policy

2.2.1 Scotland's fourth National Planning Framework (NPF4) was published by the Scottish Government on 13th February 2023. NPF4 is a long-term strategy for Scotland (to 2045) that guides spatial development, sets out national planning policies, designates national developments and highlights regional spatial priorities. Alongside adopted local development plans, NPF4 now forms part of the statutory development plan for decision making in Scotland. In NPF4, transmission infrastructure is supported in both the National Development ND3 'Strategic Renewable Electricity Generation and Transmission Infrastructure', and in Policy 11 Energy. However, proposals are required to be assessed against all relevant development plan policies.

2.2.2 The Proposed Development would form a vital element to deliver network and grid infrastructure, required to deliver the UK and Scottish Government's legally binding targets for net zero emissions and renewable energy electricity generation objectives.

2.3 Technology Solution

2.3.1 The proposed technology solution for the grid connection is a new 275 kV Underground Cable (UGC). The proposed connection is in accordance with agreements between SSEN Transmission, National Grid Electricity System Operator (as operator of the National Grid), and Loch Kemp Storage Ltd., as developer of the Scheme.

2.4 General Construction Activities

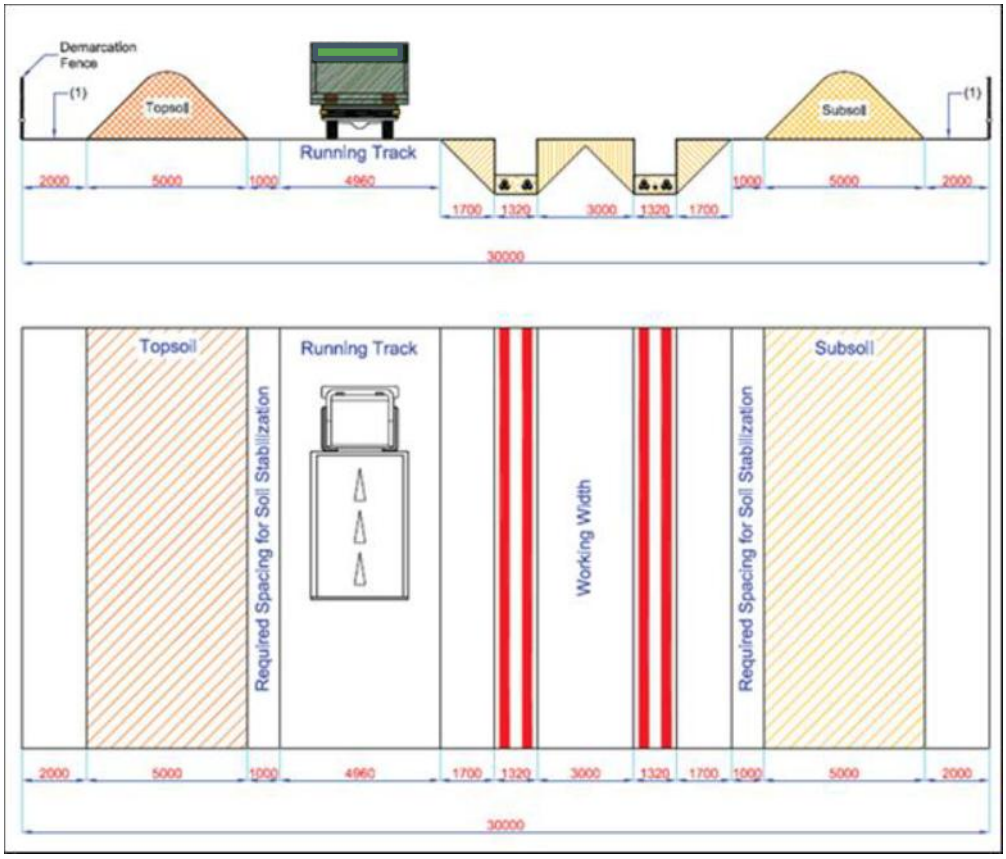
2.4.1 To facilitate the connection, the main construction elements associated with the Proposed Development are anticipated to include the:

- Establishment of one or more construction compounds;
- Establishment of suitable laydown areas for materials;
- Establishment of a temporary working corridor approximately 30 m wide;
- Installation of an access haul road and temporary bridges where required;
- Stripping of topsoil and shallow peat layers, to facilitate cable trenching and Horizontal Directional Drilling (HDD) (if required);
- Excavation of a trench up to 2 m in depth and 2 m wide, widening through benching and battering, where stability and safety concerns arise;
- Clear out of all materials likely to damage cable ducts, e.g. clods, rocks, stones and organic debris, and employ use of pumps to remove any water;
- Installation of ducting within the trench, surrounded by engineered backfill in suitable layers for protection, with the protection tile and warning tape placed above the cable line, reinstatement to sub-soil level;

- Excavation and formation of power cable joint bays, with above ground electrical link pillars and associated demarcation;
- Transportation and installation of power cable(s) and telecoms cable(s);
- Mobilisation of jointing containers and jointing of power cable(s);
- Reinstatement of joint bays and installation of fencing at link pillar locations;
- Reinstatement of excavated surface layers in reverse order; and
- Commissioning of cable system.

2.4.2 **Plate 2.1** shows a diagram of a typical UGC construction corridor.

Plate 2.1: Typical UGC Construction Corridor setup (based on 30 m width). Measurements are mm.



2.5 Other Considerations

Forestry Removal

2.5.1 Construction of the Proposed Development would likely require the removal of areas of commercial forest and native woodland. Felling would be undertaken in consultation with affected landowners. Scottish Forestry (SF) would also be consulted throughout the development of the Proposed Development, where the Proposed

Development would seek to adhere to the Scottish Government's Control of Woodland Removal Policy (CoWRP)[2].

2.5.2 After felling, any timber removed, that is commercially viable, would likely be sold, with the remaining forest material such as arisings / brash, being proposed to be mulched.

2.5.3 An Operational Corridor (OC) would be required to enable the safe operation and maintenance of the UGC. In areas of woodland, the width of the OC could vary depending on the type of woodland (based on species present) in proximity to the UGC.

Access Strategy

2.5.4 A construction haul road would be required within the UGC construction corridor to facilitate its construction. Once the UGC is installed, it is anticipated that the construction corridor would be reinstated, with an OC of approximately 20 m being maintained. Out with the construction corridor, existing tracks would be utilised, where practicable, during the construction of the Proposed Development. Permanent access tracks may be required to cable joint bays along the alignment.

Programme

2.5.5 It is anticipated that construction of the Proposed Development would take place over an 18-month period. Detailed programming of the works would be the responsibility of the Contractor in agreement with SSEN Transmission.

Biodiversity Net Gain

2.5.6 Biodiversity Net Gain (BNG) is an approach to development that aims to leave the natural environment in a measurably better state than it was pre-development. SSEN Transmission has developed a BNG toolkit based upon the Natural England metric[3], which aims to quantify biodiversity based upon the value of habitats for nature. It is an efficient and effective method for demonstrating whether development projects have been able to maintain or increase the biodiversity value of a development site after construction works.

2.5.7 The BNG toolkit would be applied to the Proposed Development, to quantify the overall potential biodiversity impacts, which includes:

- a biodiversity baseline assessment;
- analysis of habitat losses due to temporary works and permanent infrastructure; and
- analysis of biodiversity gains following reinstatement of habitats in areas of temporary construction work.

SSEN Transmission's Biodiversity Ambition

2.5.8 SSEN Transmission is committed to protecting and enhancing the environment, by minimising the potential impacts from their construction and operational activities. As part of this approach, SSEN Transmission has made commitments within its Sustainability Strategy (2024)[4], Sustainability Action Plan (2024-2031)[5] and Business Plan[6], for new infrastructure projects to:

- Ensure natural environment considerations are included in decision making at each stage of a project's development;

[2] Forestry Commission Scotland (2009) Control of Woodland Removal Policy. Available at: https://www.forestry.gov.scot/publications/285-the-scottish-government-s-policy-on-control-of-woodland-removal [Last Accessed 23/05/2025]
[3] Natural England Biodiversity Metric 3.1 Available at: https://publications.naturalengland.org.uk/file/5450039124819968 [Last Accessed 23/05/2025]
[4] The Scottish Hydro Electric Transmission Sustainability Strategy: Pathway to 2030 (2024). Available at: ssen-transmission-sustainability-strategy-2024
[5] Sustainability Action Plan 2024-2031 (2024) SHE Transmission. Available at: https://www.ssen-transmission.co.uk/globalassets/documents/sustainability-strategy/sustainability-action-plan.pdf [Last Accessed 23/05/2025]
[6] A Network for Net Zero - SSEN Transmission. Available at: ssen-transmission.co.uk.

- Utilise the mitigation hierarchy to avoid impacts by consideration of biodiversity in project design;
- Positively contribute to the United Nations (UN) and Scottish Government Biodiversity strategies, by achieving a minimum 10% net gain on all new projects gaining consent; and
- Work with their supply chain to gain the maximum benefit during asset replacement and upgrades.

2.5.9 The design and evolution of this Proposed Development's grid connection will be carried out in line with these commitments.

3. ROUTE SELECTION

3.1 Overview

3.1.1 The approach to route selection is informed by SSEN Transmission's guidance 'Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above'[7], which provides a framework to ensure environmental, technical and economic considerations are identified and appraised at each stage of the routeing process.

3.1.2 The guidance splits a project into the following principal stages:

- Stage 0: Routeing strategy development;
- Stage 1: Corridor Selection;
- Stage 2: Route Selection;
- Stage 3: Alignment Selection; and
- Stage 4: Environmental Impact assessment (EIA) and consenting (where applicable).

3.1.3 Each stage is an iterative process, which involves an increasing level of detail and resolution, bringing environmental, technical and cost considerations together in a way which seeks to achieve the best balance at each stage. Each stage of a Proposed Development can vary, depending on the type, nature and size. This is supported via consultation at each stage of the process, as appropriate.

3.1.4 The Proposed Development is currently at Stage 2: Route Selection, the objective of which, is to identify a proposed route to take forward to Stage 3: Alignment Selection.

[7] SSEN Transmission (2020). Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above, Revision 2.0.

4. THE CONSULTATION PROCESS

4.1 Overview

4.1.1 In accordance with SSEN Transmission's guidance[8], a process of consultation at Stage 2: Route Selection has been undertaken.

4.2 Methods for Consultation

Consultation Document

4.2.1 The Consultation Document[1] was produced to detail the appraisal of route options, taking account of environmental, economic and technical factors. The Consultation Document was made available in January 2025 via the project website: Loch Kemp Pumped Hydro Storage Scheme 275kV Grid Connection - SSEN Transmission.

4.2.2 **Table 4.1** details the stakeholders in receipt of the Consultation Document or otherwise informed of the website.

Table 4.1: List of Stakeholders

Stakeholders	
Statutory Consultees	
Scottish Environment Protection Agency (SEPA)	NatureScot (NS)
Historic Environment Scotland (HES)	The Highland Council (THC)
The Coal Authority	Transport Scotland
Non-Statutory Consultees	
Fisheries Management Scotland	Scottish Rights of Way and Access Society (ScotWays)
Forestry Land Scotland (FLS)	Scottish Water
Highland Raptor Study Group (HRSG)	Scottish Wildlife Trust
John Muir Trust	Scottish Wild Land Group (SWLG)
Mountaineering Scotland	Sustrans Scotland
Ness District Salmon Fishery Board (Ness DSFB)	The Royal Society for the protection of Birds (RSPB)
Scottish Forestry (SF)	

4.2.3 Feedback on the Consultation Document was initially requested by 6 December 2024.

4.2.4 The Consultation Document was subsequently shared directly with the Stratherrick and Foyers Community Council in January 2025 and any comments requested by 7 March 2025.

4.2.5 In the Consultation Document, stakeholders were asked a series of questions on specific aspects of the Proposed Development, as follows:

- Has the need for the project been clearly explained?
- Have we explained the approach taken to select the preferred route adequately?
- Are there any other factors, or environmental features, that you consider may have been overlooked during the preferred route selection process?

[8] SSEN Transmission (September 2020), Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above, Revision 2.0.

- Do you feel, on balance, that the preferred route selected is the most appropriate for further consideration at the alignment selection stage?

Public Consultation Events

4.2.6 No formal dedicated in-person consultation event has taken place to date for the Proposed Development. Project information and project staff were available at the following location and date during a public event for the proposed nearby Foyers Substation works:

- 28th November 2024 – Whitebridge – The Wildside Centre, 3pm-7pm.

5. CONSULTATION RESPONSES FROM STATUTORY AND NON-STATUTORY CONSULTEES

5.1 Introduction

5.1.1 **Table 5.1** sets out a summary of the feedback received by statutory and non-statutory consultees, following the consultation period (October 2024 to March 2025). A response to the feedback is also provided by SSEN Transmission, together with confirmation of the action to be taken, where relevant.

Table 5.1: Statutory and Non-Statutory Consultee Feedback

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Statutory		
The Highland Council (THC)	No response has been received from THC.	SSEN Transmission will continue to keep THC informed of the Proposed Development.
NatureScot (NS)	NS identify that Route Option 1, now the preferred route option, could potentially affect Loch Bran SSSI. NS recommend an early indication of route past this SSSI, as they believe it is possible to avoid impacts on the SSSI with good route choice.	The focus of NS's response is noted. Whilst Route Option 1 has been designed to exclude Loch Bran SSSI, any potential effects on this designated site will continue to be considered during Stage 3: Alignment Selection.
	NS noted that both routes would initially cover the same landholding within the Dell Estate. Parts of this landholding have been identified for proposed peatland restoration, as part of the Loch Kemp Pumped Storage Scheme application. These peatland areas have been selected to be restored to offset peatland losses, should the Scheme be built. Therefore, NS note that it is important that the cable connection avoids these areas, otherwise, NS advise that additional offsetting areas are secured. NatureScot advise that the applicant identify these areas of peatland to enable the cable route to avoid them.	The peatland restoration areas noted within NS's response, have been identified within Volume 4, Appendix 10.7: Outline Habitat Management Plan (non-SAC) of the EIA Report for the Loch Kemp Storage Scheme (ref: ECU00003398). With careful consideration at Stage 3: Alignment Selection, it is anticipated that these areas can be avoided. This will further be considered during the alignment selection stage of the project.
Scottish Environmental Protection Agency (SEPA)	SEPA provide no comment on the selection of a preferred route at this stage, although will have an interest once the alignment and construction corridor of the UGC is known, along with any baseline habitat and peat depth data. SEPA encourage the Applicant to make the most use of disturbed areas, where possible.	SSEN Transmission will continue to liaise with SEPA once an alignment for the UGC is identified. This will be informed by more detailed habitat and peat depth surveys through the alignment stage.
Historic Environment Scotland (HES)	HES welcome that the Consultation Document explains the need for the Proposed Development and the approach to route stage. HES identify that based on the current information available, the preferred route (Route Option 1) is unlikely to have significant adverse impacts on the A-listed building *of Foyers Hydroelectric Power Scheme, Former Aluminium Smelter, Powerhouse and Smelter*	SSEN Transmission are pleased to note HES's response and welcome HES's comments in relation to this A listed building. Further consideration will be given to this aspect during Stage 3: Alignment selection.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	(LB1880), as this would fall within Route Option 2.	
	HES identify a scheduled monument falling partly within Route Option 1 and partly within Route Option 2: *Dell Farm, burial mounds 350m NE of (SM4536).* The monument is nationally significant as one example of a rare type of Pictish monument. It is an exceptionally fine field monument and has the potential to increase understanding of burial customs and society in the first millennium *AD.* HES welcome confirmation in Section 6.2.16 and Appendix 1 that direct physical impacts on this scheduled monument would be avoided through design during Alignment Selection. The establishment of a construction corridor of 40 m (30 m during operational phase) would entail the felling of trees along the construction corridor and the placement of cable joint bays and link pillars along the route.	HES comments are welcomed and have been noted. This scheduled monument, and other relevant designated cultural heritage assets, will be considered further during Stage 3: Alignment Selection of the Proposed Development, when HES will be re-consulted. It should be noted that it is anticipated that the construction corridor for the UGC would be 30 m wide and the Operational Corridor (OC) would be reduced to 20 m wide, although the corridor width could vary along the cable route during both construction and operation. For example, in areas of woodland, the width of the OC could vary depending on the type of woodland (based on species present) in proximity to the UGC.
The Coal Authority	The Coal Authority has no specific comment.	SSEN Transmission note the Coal Authority's response.
Non-Statutory		
Forestry Land Scotland (FLS)	FLS welcome that the need and approach for the Proposed Development is clearly explained within the Consultation Document.	SSEN Transmission are pleased to note FLS's response and welcome FLS's comments in relation to route preference (noted below).
	FLS note some factors that may have been overlooked during the appraisal of route options: The potential for visual impacts on tourist use of canal/Loch Ness for Route Option 2. Also, Route Option 1 has less forestry interaction compared with Route Option 2. The felling could dovetail with the FLS LMP for restocking of Ancient Woodland Inventory (AWI) areas with species in-keeping with the AWI designations. On balance, FLS agree that Route Option 1 is the most appropriate for further consideration at Stage 3: Alignment Selection, as it appears to afford the best opportunities to minimise impacts and provide mitigation opportunities.	Comments by FLS on the route options presented are welcomed and will be considered further during Stage 3: Alignment Selection.

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	FLS encourage further discussion with SSEN Transmission on the Operational Corridor (OC) requirements for the UGC, particularly in exploring opportunities the Development could create, such as wildlife management access.	These comments are noted and SSEN Transmission will maintain engagement with FLS as the Proposed Development progresses.
Highland Raptor Study Group (HRSG)	Highland Raptor Study Group (HRSG) note that there is no reference in the report to breeding osprey within the Study Area, in addition to the presence of breeding white tailed eagle just outside the boundary of the Study Area. HRSG are happy to share the location of the nests of these species, in confidence.	HRSG's comments are welcomed. SSEN Transmission and their environmental advisors will be contacting HRSG as part of the baseline data collection for Stage 3: Alignment Selection of the Proposed Development.
Sustrans Scotland	Sustrans Scotland performed a review that confirmed that Loch Kemp is on a section of route that has been reclassified in 2020 so no longer forms part of the National Cycling Network (NCN).	SSEN Transmission note Sustrans Scotland response.
Transport Scotland	Having examined the two routes, Transport Scotland note both routes are confined to the east side of Loch Ness, between Foyers in the north and Whiteside in the south. The nearest trunk road to the Study Area, is the A82(T) which lies approximately 14 km southwest of the southern boundary of the Study Area, or the A9(T) which lies 30 km due east. Given the distance of the Study Area from the trunk road network, Transport Scotland has no comment to make on the route options, however, would require consultation on the potential impact of increased traffic on the trunk road network associated with construction of the UGC. This assessment should include the vehicle numbers associated with the required forestry felling.	This has been noted. Transport Scotland will continue to be consulted as the Proposed Development progresses.

6. COMMUNITY CONSULTATION RESPONSES

6.1 Introduction

6.1.1 No feedback was received by the local community or general public, following the consultation period (October 2024 to March 2025).

7. IDENTIFICATION OF A PROPOSED ROUTE

7.1 Overview

7.1.1 SSEN Transmission has reviewed and considered the responses provided by stakeholders following the identification of route options, as set out within the Consultation Document[1]. Responses to the general points raised by stakeholders through the consultation process are included in Sections 5 and 6 above.

7.1.2 For Route Option 1, the Consultation Document[1] identified the most notable constraints were the natural heritage designations. From an engineering perspective, major crossings, in addition to the terrain and elevation, were noted as important considerations. Stakeholder comments noted that Route Option 1 would have less interaction with forestry compared with Route Option 2 but also highlighted the potential interaction with the Loch Bran SSSI, although acknowledged this could likely be avoided.

7.1.3 For Route Option 2, the Consultation Document[1] noted that felling of native woodland as identified within the AWI, would be required to facilitate the route option. The route option is dominated by non-native conifer plantation, as well as smaller areas of native woodland, that would likely be unavoidable. The Consultation Document also noted that it would be more difficult for Route Option 2 to avoid Annex 1 habitats, such as upland wet heath and dry heath, neutral grassland, natural lakes and ponds and upland acid grassland, which are also classified as habitats of high distinctiveness, with high value in terms of BU within the BNG SSEN Transmission Metric. From an engineering perspective, Route Option 2 poses similar constraints to Route Option 1, as it is also situated on unfavourable terrain and elevation. There was general agreement from stakeholders in relation to these constraints, also highlighting the potential visual impact on tourist use of the Loch Ness/canal and potential interaction with cultural heritage.

7.1.4 Having considered this feedback, SSEN Transmission has concluded that the preferred route option identified in the Consultation Document (Route Option 1) should be taken forward as the proposed route to Stage 3: Alignment Selection. The proposed route can be seen in **Figure 2**.

8. CONCLUSIONS AND NEXT STEPS

8.1 Conclusion

8.1.1 The proposed Loch Kemp Storage Scheme requires connection to the electricity transmission network at existing Foyers Switching Station. It is proposed that this would be achieved via the construction and operation of a new 275 kV UGC.

8.1.2 This Report on Consultation documents the consultation process which has been undertaken for the Proposed Development, between October 2024 and March 2025. The programme of consultation was designed to engage with stakeholders, including statutory and non-statutory consultees, local communities, landowners and members of the public, in order to invite feedback in response to the route options identified for the Proposed Development, as set out in the Consultation Document[9].

8.1.3 This report has described the key responses received and how this feedback has informed the identification of a proposed route to be taken forward to Stage 3: Alignment Selection of the Proposed Development. The consultation process has confirmed that **Route Option 1** should be taken forward as the proposed route, within which to identify and appraise alignment options.

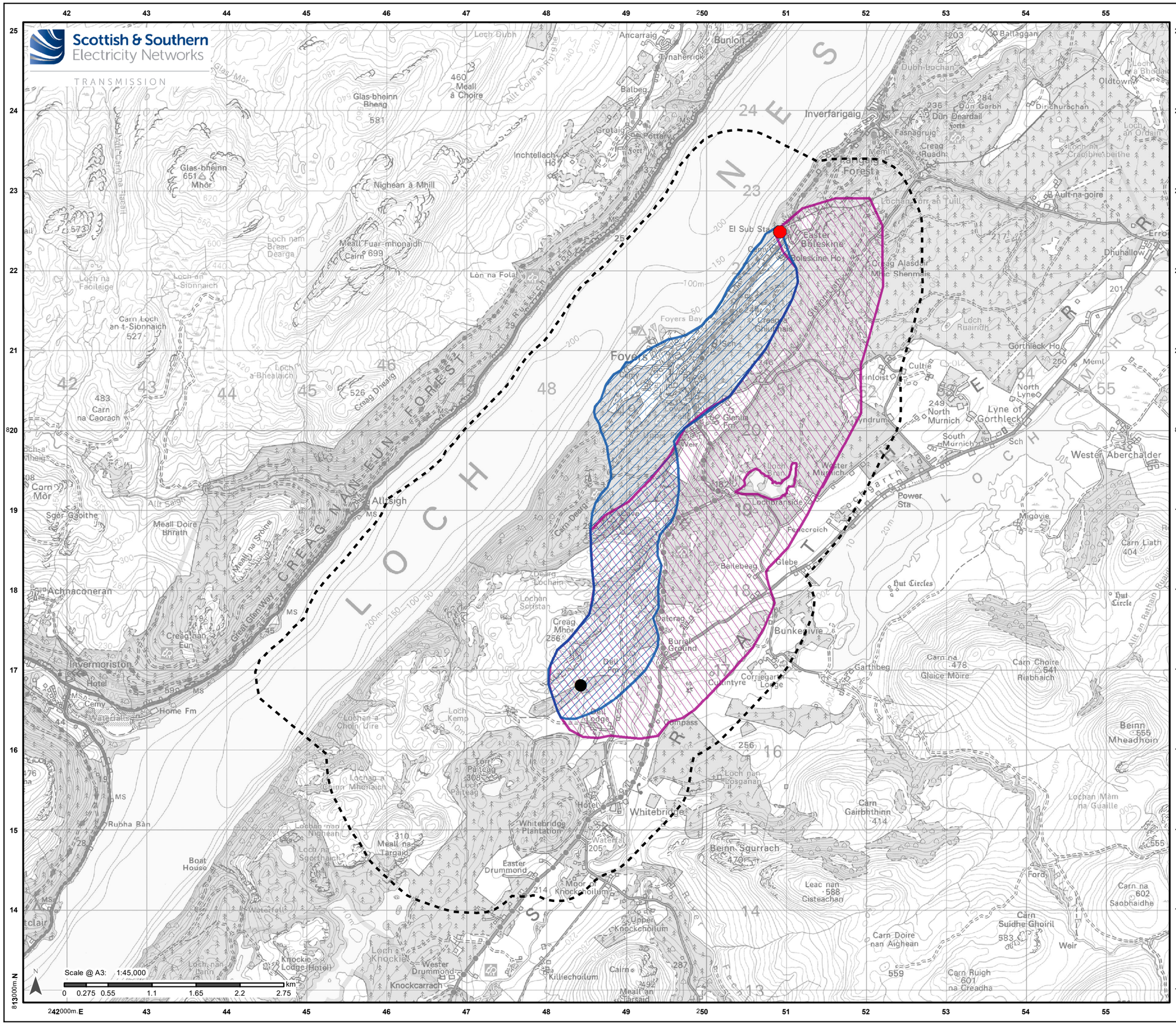
8.2 Next Steps

8.2.1 The Proposed Development will now progress into Stage 3: Alignment Selection, commencing with the identification of alignment options within the proposed route. These will be informed by this Report on Consultation, as well as further consultation exercises and detailed surveys, which may identify any additional and / or currently unknown engineering, environmental or land-use constraints.

8.2.2 Formal consultation will be organised on completion of the alignment studies, to enable comments to be sought on the preferred alignment identified. It is anticipated that this will occur in 2025.

[9] SSEN Transmission (October 2024) Loch Kemp Storage Scheme 275 kV Grid Connection - Consultation Document (Route Options)

FIGURES

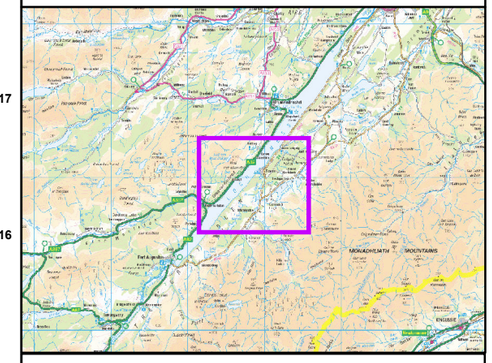


Legend

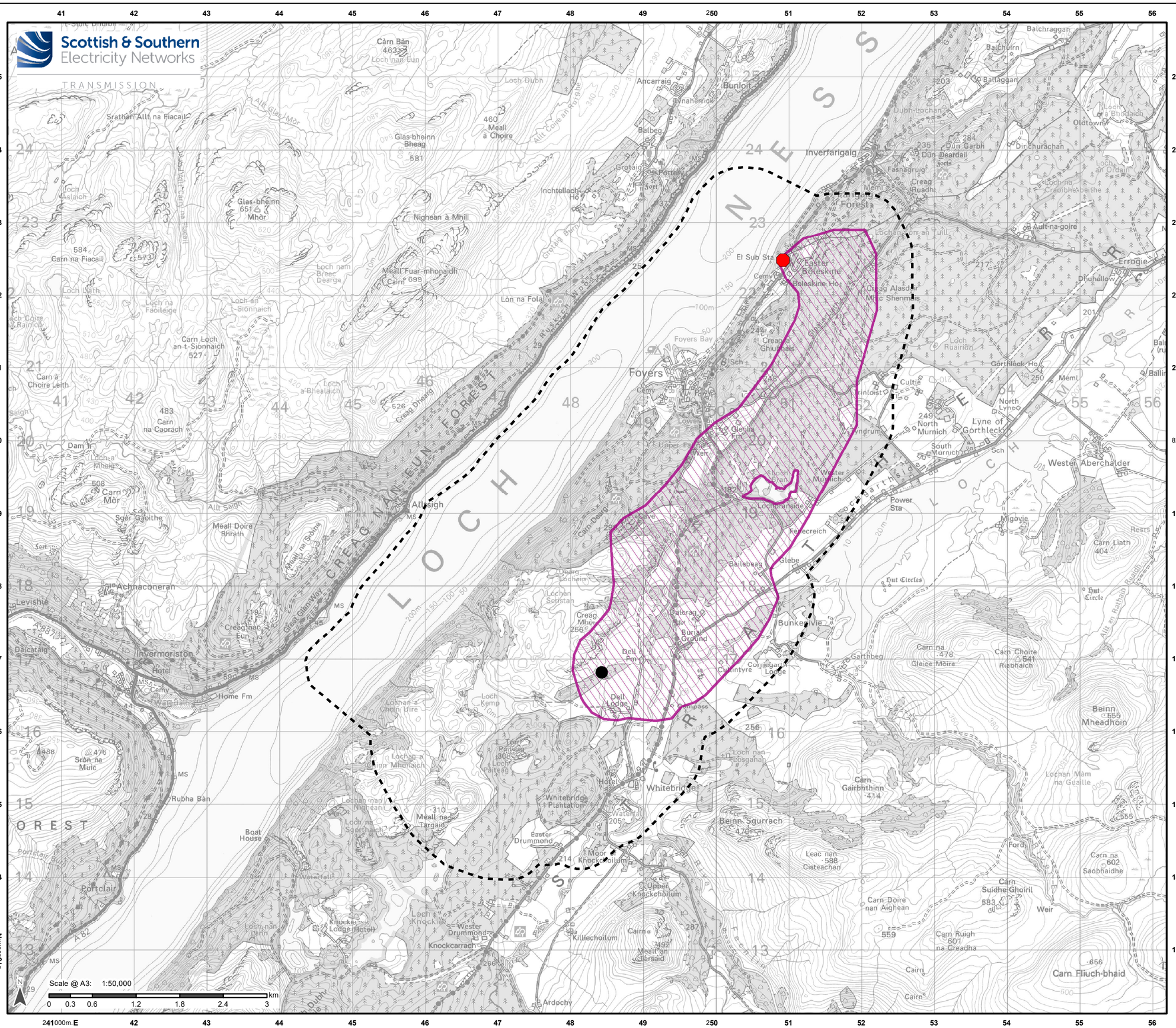
- Study Corridor
- Point of Connection
- Existing Foyers Switching Station

Route Options

- Route Option 1
- Route Option 2



Project No:	LT366
Project:	Loch Kemp Storage Scheme 275 kV Grid Connection
Title:	Report on Consultation (Routeing)
	Figure 1: Route Options
Drawn by:	FL
Date:	07/02/2025
Drawing:	122020-D1-ROC-1.0.0

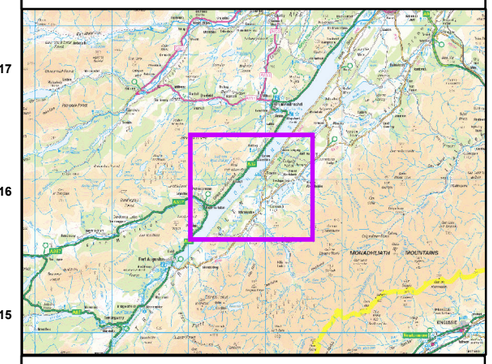


Legend

- Study Corridor
- Point of Connection
- Existing Foyers Switching Station

Proposed Route

- Route Option 1



Project No: LT366

Project: Loch Kemp Storage Scheme 275 kV Grid Connection

Title: Report on Consultation (Routeing)

Figure 2: Proposed Route Option

Drawn by: FL Date: 07/02/2025

Drawing: 122020-D2-ROC-1.0.0