Scottish & Southern Electricity Networks

Report on Consultation - Alignment and Site Selection

Red John Pumped Storage Scheme 275kV Connection

May 2023

REF: LT325

Rev								
01	Prepared By	Eleanor Smith	Checked By	Russell Buckley	Approved By	Keith Grant	Date of Issue	20/03/23
02	Prepared By	Eleanor Smith	Checked By	Russell Buckley	Approved By	Keith Grant	Date of Issue	03/05/23
03	Prepared By	Eleanor Smith	Checked By	Russell Buckley	Approved By	Keith Grant	Date of Issue	19/05/23

Scottish & Southern Electricity Networks

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GLOSSARY

Term	Definition
AIS	Air Insulated Switchgear
Alignment	A centre line of an overhead line OHL, along with location of key angle structures.
Amenity	The natural environment, cultural heritage, landscape and visual quality. Also includes the impact of SHE Transmission's works on communities, such as the effects of noise and disturbance from construction activities.
Birds of Conservation Concern (BoCC)	Birds of Conservation Concern is compiled by a coalition of the UK's leading bird conservation and monitoring organisations and reviews the status of all regularly occurring birds in the UK, Channel Islands and Isle of Man.
Busbar	A metallic strip or bar, typically housed inside switchgear, panel boards, and busway enclosure for local high current power distribution.
Bus Coupler	Used to couple one bus to another without interrupting the power supply or creating hazardous arcs.
Conductor	A metallic wire strung from structure to structure, to carry electric current.
Consultation	The dynamic process of dialogue between individuals or groups, based on a genuine exchange of views and, normally, with the objective of 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.
Environmental Impact Assessment (EIA)	A formal process set down in The Electricity Works (EIA) (Scotland) Regulations 2000 (as amended in 2008) used to systematically identify, predict and assess the likely significant environmental impacts of a proposed project or development.
Gardens and Designed Landscapes (GDLs)	The Inventory of Gardens and Designed Landscapes lists those gardens or designed landscapes which are considered by a panel of experts to be of national importance.
Groundwater Dependent Terrestrial Ecosystems (GWDTE)	Habitats which critically depend on groundwater flows.
Habitat	Term most accurately meaning the place in which a species lives, but also used to describe plant communities or agglomerations of plant communities.
Kilovolt (kV)	One thousand volts.
Listed Building	Building included on the list of buildings of special architectural or historic interest and afforded statutory protection under the 'Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997' and other planning legislation. Classified categories A – C(s).
Mitigation	Term used to indicate avoidance, remediation or alleviation of adverse impacts.
Micrositing	The process of positioning individual structures to avoid localised environmental or technical constraints.
Mitigation	Term used to indicate avoidance, remediation or alleviation of adverse impacts.
National Scenic Area (NSA)	A national level designation applied to those landscapes considered to be of exceptional scenic value.
No Net Loss (NNL)	Where ecosystem services and damages resulting from human activities are balanced by at least equivalent gains.

Term	Definition
Overhead line (OHL)	An electric line installed above ground, usually supported by lattice steel towers or poles.
Plantation Woodland	Woodland of any age that obviously originated from planting.
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.
Routeing	The work undertaken which leads to the selection of a proposed alignment, and if required capable of being taken forward into the consenting process under Section 37 of the Electricity Act 1989.
Scheduled Monument	A monument which has been scheduled by the Scottish Ministers as being of national importance under the terms of the 'Ancient Monuments and Archaeological Areas Act 1979'.
Scottish Environment Protection Agency (SEPA)	SEPA is Scotland's principal environmental regulator, protecting and improving Scotland's environment.
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 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 Landscape Area (SLA)	Landscapes designated by The Highland Council which are considered to be of regional/local importance for their scenic qualities.
Special Protection Area (SPA)	An area designated under the Wild Birds Directive (Directive74/409/EEC) to protect important bird habitats. Implemented under the Wildlife and Countryside Act 1981.
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.
Stakeholders	Organisations and individuals who can affect or are affected by SHE Transmission works.
Study Area	The area within which the corridor, route and alignment study takes place.
Underground Cable (UGC)	An electric line installed below ground.
Volts	The international unit of electric potential and electromotive force.
Wild Land Area (WLA)	Those areas comprising the greatest and most extensive areas of wild characteristics within Scotland.

1. INTRODUCTION

1.1 Purpose of Document

Scottish Hydro Electric Transmission plc, operating and known as Scottish and Southern Electricity Networks Transmission (hereafter referred to as 'SSEN Transmission'), is proposing to construct and operate an underground connection from the consented Red John 275kV Switching Station to the existing Knocknagael 275kV Substation and also an extension to the Knocknagael Substation (the 'Proposed Development').

This Report on Consultation documents the consultation for the Proposed Development undertaken between December 2022 and February 2023, during the alignment and site selection stages. A programme of consultation was designed to engage with key stakeholders including statutory and non-statutory consultees, local communities, landowners, and individual residents to invite feedback on the rationale for and approach to, the selection of the preferred route and site.

This report describes the key feedback received and details the actions taken by SSEN Transmission in response to the comments provided.

1.2 Document Structure

This Report on Consultation Document comprises the following sections:

- **1: Introduction** – setting out the purpose of the Report on Consultation Document;
- **2: The Proposals** – describes the need for the proposals, the strategic alternatives considered, the proposed technology solution and the typical construction methods;
- **3: Alignment Selection Process** – describes how the preferred alignment was identified;
- **4: Site Selection Process** – describes how the preferred sites were identified;
- **5: The Consultation Process** – describes the framework for consultation and methods which have been employed;
- **6: Consultation Responses and Key Issues** – summarises the range of responses and key comments arising from the public consultation and documents the statutory and non-statutory consultees whom responded through the consultation process;
- **7: Project Responses to Consultation** – describes how the comments and issues raised statutory and non-statutory consultees during consultation will be addressed; and
- **8: Conclusion** – provides a summary of the conclusions reached and actions going forward.

2. THE PROPOSALS

2.1 The Need for the Project

SSEN Transmission is the electricity transmission licence holder in the north of Scotland and has a duty 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*.' SSEN Transmission also has obligations to offer non-discriminatory terms for connection to the transmission system, both for new generation and for new sources of electricity demand.

The consented Red John 450MW Pumped Storage (hydro) Scheme requires connection to the SSEN electricity network at Knocknagael substation by 2027.

2.2 Project Overview

2.2.1 Red John Pumped Storage (hydro) Scheme Grid Connection

Due to the developer wanting certainty as to the consenting process, they have decided to pursue an underground cable route (the Proposed Development) from the Red John development to the substation at Knocknagael. This work can be undertaken via Permitted Development (PD) Rights as set out in under Class 40 1(a) of The Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (TCP GDPO) and does not require planning permission.

2.2.2 Knocknagael Substation Extension

As part of the works required to connect the Red John generation into the wider grid, it is necessary to undertake a substation extension at Knocknagael. The works will involve an extension of the existing footprint of the substation at Knocknagael within two distinct areas. The proposed connection requires a firm connection meaning that each of the two proposed circuits will need to be connected on either side of the bus section. This requirement dictates that the existing substation needs to be extended on two sides to allow the appropriate connection. The proposed development is in line with SSEN Transmission's commitment and licence obligation to facilitate the connection of renewable generators to the grid through an economical, efficient and coordinated approach to transmission reinforcement.

2.3 Proposals Overview

2.3.1 Red John Pumped Storage (hydro) Scheme Grid Connection

A full underground cable solution is proposed to mitigate the following issues:

- Landscape and visual impacts;
- Impact to bird species associated with the nearby Loch Ashie SPA; and
- The additional complexity of consenting an overhead line.

Construction Activities

Key tasks during construction of underground cable (UGC) will involve:

- Enabling work (e.g. forestry clearance, public road improvements and establishment of temporary works such as construction drainage and site compound/welfare);
- Construction of permanent and temporary access roads and drainage;
- Excavation of cable trench;
- Installation of electrical equipment;
- Installation of cable ducts and joint bays;
- Inspections and commissioning; and
- Removal of temporary works and site reinstatement.

Access During Construction

The access strategy has not yet been determined. Where possible, existing access tracks will be used and upgraded as required. New access tracks may be required and where there is a justified long-term requirement, they will be left in place. Where ground conditions permit, it is preferable to construct the infrastructure without an access track (e.g. on dry and level pasture) although it is unlikely no access track would be required. Temporary matting may be used in sensitive areas subject to an assessment of gradients and ground conditions.

New access tracks (permanent or temporary) would generally be constructed using a geotextile, with approximately 200 mm of crushed and compacted stone laid on top. Tracks may be floated over areas of peat, or may use cut and fill approaches, subject to ground conditions and gradients.

A Transport Statement or similar will be produced as part of the Environmental Appraisal to set out proposed traffic and transport details of the Proposed Development.

Forestry Removal

Construction of the Proposed Development would require the removal of sections of forestry, which would be undertaken in consultation with Scottish Forestry and affected landowners.

After felling, any timber removed that is commercially viable would be sold and the remaining forest material would be dealt with in a way that delivers the best practicable environmental outcome and is compliant with waste regulations.

An operational corridor would be required to enable the safe operation and maintenance of the UGC. This will vary depending on the type of woodland (based on species present) in proximity to the UGC.

Biodiversity Net Gain

SSEN Transmission has a target for projects gaining consent to achieve positive effects for biodiversity. This is aligned to the Scottish Government's National Planning Framework 4 (NPF4)[1] Policy 3 aim for proposed developments to contribute to biodiversity enhancement.

As part of the optioneering process, a Biodiversity Net Gain (BNG) assessment has been undertaken against each alignment and site option.

Programme

The programme for the Project is currently under development, an indicative programme is as follows:

- Construction start: November 2024; and
- Construction complete and UGC operational: July 2027.

2.3.2 Knocknagael Substation Extension

Construction Activities

Key tasks during construction of the substation are as follows:

- Enabling work (e.g. forestry clearance, public road improvements and establishment of temporary works such as construction drainage and site compound/welfare);
- Construction of cut/fill to provide a level platform;
- Construction of permanent access roads and drainage;
- Construction of civil engineering infrastructure;
- Installation of mechanical/electrical equipment;
- Inspections and commissioning; and
- Removal of temporary works, landscape design implementation (if required) and site reinstatement.

[1] The Scottish Government (2023) National Planning Framework 4, The Scottish Government, Edinburgh. Available at: https://www.gov.scot/publications/national-planning-framework-4/

Access During Construction

The access strategy has not yet been determined. Where possible, existing access tracks will be used and upgraded as required. New access tracks may be required and where there is a justified long term requirement, they will be left in place. Where ground conditions permit, it is preferable to construct the infrastructure without an access track (e.g. on dry and level pasture) although it is unlikely no access track would be required. Temporary matting may be used in sensitive areas subject to an assessment of gradients and ground conditions.

New access tracks (permanent or temporary) would generally be constructed using a geotextile, with approximately 200 mm of crushed and compacted stone laid on top. Tracks may be floated over areas of peat, or may use cut and fill approaches, subject to ground conditions and gradients.

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Construction of the Proposed Development would require the removal of sections of forestry, which would be undertaken in consultation with Scottish Forestry and affected landowners.

After felling, any timber removed that is commercially viable would be sold and the remaining forest material would be dealt with in a way that delivers the best practicable environmental outcome and is compliant with waste regulations.

Biodiversity Net Gain

SSEN Transmission has a target for projects gaining consent to achieve positive effects for biodiversity. This is aligned to the Scottish Government's NPF4[2] Policy 3 aim for proposed developments to contribute to biodiversity enhancement.

As part of the site optioneering process, a BNG assessment has been undertaken against each site option.

Programme

The programme for the Project is currently under development, an indicative programme is as follows:

- Construction Start: November 2024; and
- Operation: July 2027.

[2] The Scottish Government (2023) National Planning Framework 4, The Scottish Government, Edinburgh. Available at: https://www.gov.scot/publications/national-planning-framework-4/

3. UGC ALIGNMENT SELECTION PROCESS

3.1 Introduction

The approach to alignment selection is informed by the following SSEN Transmission guidance:

- Procedures for Routeing Overhead Lines and Underground Cables of 132kV or above, SSEN Transmission, 2020 (PR-NET-ENV-501) (Routeing Guidance); and
- Biodiversity Net Gain Flow Chart, Guidance and Project Toolkit (FC-NET-ENV-500).

The guidance develops a process which aims to balance environmental, technical and economic considerations throughout the route options process. In consideration of these principles, the method of identifying an environmentally preferred route option in this study has involved the following four key tasks:

- Identification of the baseline situation;
- Identification of alternative route options;
- Environmental, technical and economic analysis of route options; and
- Identification of an environmentally preferred route option.

This guidance helps SSEN Transmission to meet its obligations under Schedule 9 of the Electricity Act 1989, which requires transmission licence holders:

- To have a regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and
- To do what they reasonably can to mitigate any effect that the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

The guidance develops a process which aims to balance these environmental considerations with technical and economic considerations throughout the route options process.

The guidance splits a project into six stages, as follows:

- Pre-Routeing Activities: Selection of proposed connection option;
- Stage 0: Routeing strategy development;
- Stage 1: Corridor Selection;
- Stage 2: Route Selection;
- Stage 3: Alignment Selection; and
- Stage 4: Consenting process.

The stages that are carried out can vary depending on the type, nature of and size of a project and consultation is carried out at each Stage of the process. The project is currently at Stage 3: Alignment Selection.

3.2 Stages of the Methodology

The key stages summarised above, have been undertaken for this project as follows:

3.2.1 Pre-Routeing Activities

Pre-routing activities were not required due to the limited scale of the project.

3.2.2 Stage 0 – Routeing Strategy Development

The routing strategy development process was not required due to the limited scale of the project.

3.2.3 Stage 1 – Corridor Selection

The corridor selection stage seeks to identify a series of linear areas (corridors) capable of providing a continuous connection between the defined connection points and delivering the required transmission connection. The corridor selection process was not required due to the limited scale of the project.

3.2.4 Stage 2 – Route Selection

The route selection stage seeks to identify a series of 1 km wide linear areas (routes) capable of providing a continuous connection between the defined connection points and delivering the required transmission connection within the proposed route. Three routes were considered:

- Route A begins in the Red John Pumped Storage Scheme Switching Station and travels north until it meets the B862. Here, the route travels in a north-easterly direction until it crosses Laggan Burn, where the route curves to the east to join the Knocknagael substation, east of Essich.
- Route B begins in the Red John Pumped Storage Scheme Switching Station, and travels in a north easterly direction, to the west of Loch Ashie, until it meets Knocknagael substation. Route B is the most direct route of the options considered.
- Route C begins in the Red John Pumped Storage Scheme Switching Station and travels east, to the south of Loch Ashie. Just before the route meets Loch Ashie, it narrows to pass through a small corridor between Loch Ashie and an engineering headpond, that will form part of the Red John Pumped Storage development and must be avoided. The route then curves around the south of Loch Ashie, to continue north towards Knocknagael substation.

The appraisal concluded that Route B was the environmentally preferred route due to the lower potential for impacts to sensitive habitat including peat and blanket bog, as well as a lower potential to impact agriculture and is located further from residential properties. The BNG appraisal found Route A to be the preferred option, however, this was solely an assessment of habitats and did not take account of species data across the route options. From an engineering perspective, Route B was also preferred. This was because its main impacts were associated with likely requirements for multiple crossings of the Essich Road and the felling of some mature trees. These risks would be mitigated as much as possible during the development of the cable route alignment.

Consultation with key statutory consultees including Nature Scot, The Highland Council (THC), Scottish Environment Protection Agency (SEPA) and Historic Environment Scotland (HES) was undertaken on the proposed technology option and corridor.

3.2.5 Stage 3 – Alignment Selection

This project is currently at the alignment selection stage and in consideration of the principles outlined in the guidance document, the method of identifying a preferred alignment option in this study has involved the following key tasks:

- Identification of alignment options;
- Environmental analysis of alignment options;
- Identification of a preferred alignment option; and
- Will set out an access strategy i.e., how access to the alignment will be provided to facilitate construction e.g. the nature, indicative location and extent of temporary access tracks, construction tracks and road improvements.

3.3 Area of Search

The area of search is between a proposed connection point within the consented Red John Pumped Hydro Storage Scheme (approx. grid reference NH60652 34088), and the existing Knocknagael substation (approx. grid reference NH65235 39105).

3.4 Baseline Conditions

The following information sources have informed the desk-based baseline study to identify potential environmental constraints within and adjacent to the alignment.

- Identification of environmental designated sites and other constraints, utilising GIS datasets available via NatureScot Site Link[3] and other sources. These include:
    - Special Areas of Conservation (SAC);
    - Special Protection Areas (SPA);
    - Proposed Special Protection Areas (pSPA);
    - Sites of Special Scientific Interest (SSSI);
    - National Scenic Area (NSA);
    - Wild Land Areas (WLA);
    - Royal Society for the Protection of Birds (RSPB) reserves;
    - Land capability for agriculture;
    - Ancient Woodland Inventory (AWI);
    - Geological Conservation Review Sites;
    - Carbon-rich soil, deep peat and priority peatland habitats; and
    - Areas at risk of flooding (SEPA flood map [(4)]).
- Identification of archaeological designations and other recorded sites, utilising GIS datasets available via Historic Environment Scotland Data Services and Local Historic Environment Teams. These include:
    - World Heritage Sites (WHS) and buffers;
    - Scheduled Monuments;
    - Category A, B and C listed buildings;
    - Gardens and Designed Landscapes; and
    - Historic Environment Records (HER), SMR and Canmore database.
- Review of the Highland Wide Local Development Plan (2012) to identify local policies and further environmental constraints and opportunities, such as Local Nature Conservation Sites (LNCS), core paths or other locations important to the public. A review by the Highland Council of the HwLDP was anticipated in Spring/Summer 2022, however at the time of writing this report there is no further information on this;
- Review of landscape character assessments of relevance to the Study Area;
- Review of Ordnance Survey (OS) mapping (1:50,000 and 1:25,000) and online GIS data sources from OS Open Data) and aerial photography (where available) to identify other potential constraints such as settlement, properties, walking routes, cycling routes etc.;
- Extrapolation of OS Vectormap GIS data to identify further environmental constraint including locations of watercourses and waterbodies, roads classifications and degree of slope; and
- Review of other local information through online and published media such as tourism sites.

3.5 Alignment Identification and Selection Methods

Alignment options were identified following site appraisals, taking into account the most notable constraints identified during the baseline studies. In summary, the following has been taken into account as far as they are practicable and relevant at this stage and will be considered in more detail during Stage 4 (Consenting Process):

- Avoid if possible major areas of highest amenity value (including those covered by national and international designations and other sensitive landscapes); and
- Avoid by deviation, smaller areas of high amenity value.

[3] https://sitelink.nature.scot/home

[4] http://map.sepa.org.uk/floodmap/map.htm

3.6 Appraisal Method

3.6.1 Environmental

The appraisal of alignment options has involved systematic consideration against the following environmental topic areas:

- Natural Heritage - Designations, Protected Species, Habitats, Ornithology and Geology, Hydrology and Hydrogeology;
- Cultural Heritage - Designations and Cultural Heritage Assets;
- People – Settlements, Visual and Physical Effects;
- Landscape - Designations and Character; and
- Land Use - Agriculture, Forestry and Recreation.

3.6.2 Engineering

The appraisal of alignment options has involved systematic consideration against the following engineering topic areas:

- Infrastructure crossings - major crossings;
- Environmental design - elevation, atmospheric pollution, contaminated land, flooding;
- Ground conditions - terrain, peat;
- Construction/Maintenance - access; and
- Proximity - clearance distance, communication masts, metallic pipelines.

3.6.3 Economic

The appraisal of site options involves systematic consideration against the following economic topic areas:

- **Capital** - construction; diversions; public road improvements; felling; land assembly
- **Operational** – inspections; maintenance

The key consideration in the economic appraisal is the length of the varying alignment options. Due to the similar nature of the alignment options and the two diversions from these (see section 4.1) an economic appraisal was not undertaken. All options are considered comparable in terms of capital and operational costs.

3.6.4 Identification of a Preferred Alignment

Following review of all the potential alignment options, these have been considered in combination to arrive at a preferred alignment option. The overall objective throughout the appraisal of alignment options has been to take full consideration of all environmental factors to minimise any potential adverse impacts on the environment whilst taking into account technical and cost considerations.

4. SUBSTATION SITE SELECTION PROCESS

4.1 Introduction

The approach to site selection is informed by the SSEN Transmission guidance:

- Substation Site Selection Procedures for Voltages at or above 132kV; and
- Biodiversity Net Gain Flow Chart, Guidance and Project Toolkit (FC-NET-ENV-500).

This guidance broadens the basis for site selection decisions to reflect contemporary practice, and ensures environmental, technical and economic considerations are identified and appraised at each stage of the site selection process.

The guidance sets out the SSEN Transmission approach to selecting new electricity transmission substation sites. It also covers requirements to extend existing substation sites. This document helps SSEN Transmission to meet its obligations under Schedule 9 of the Electricity Act 1989, which requires transmission licence holders:

- to have a regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interests; and
- to do what they reasonably can to mitigate any effect that the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

The guidance develops a process which aims to balance these environmental considerations with technical and economic considerations throughout the site selection process.

The guidance splits a project into four stages, as follows:

- Pre-Site Selection Activities: Selection of proposed substation option (summarised in section 2.3 of this document);
- Stage 1: Initial Site Screening;
- Stage 2: Detailed Site Selection; and
- Post-Site Selection Activities Consenting Process.

The stages that are carried out can vary depending on the type, nature of and size of a project and consultation is carried out at each Stage of the process. The project is currently at Stage 2: Detailed Site Selection.

4.2 Stages of the Methodology

The key stages summarised above, have been undertaken for this project as follows:

4.2.1 Pre-Site Selection Activities

The starting point in all substation projects is to establish the need for the project and to select the favoured strategic option to deliver it.

4.2.2 Stage 1 – Initial Site Screening

This stage seeks to identify technically feasible, economically viable and environmentally acceptable site options within a defined area. The site options appraisal would be informed by input from the SSEN Transmission ‘Suitability Multi-Criteria Analysis’ (MCA), Geographic Information System (GIS) tool, site walkover and field reconnaissance, and further desk study information.

In line with Stage 1, an assessment of five substation options was undertaken. Options 1 and 2 were considered preferable due to slightly more favourable hydrological conditions. The engineering appraisal identified that only Options 1 and 3 are feasible. This is because the extension requires a close connection to the existing busbar sets which are adjacent to Options 1 and 3.

The preferred solution was therefore to extend Knocknagael Substation into both Options 1 and 3 to meet SSEN’s connection requirements.

Engineering therefore identified four ‘micro options’ within Option 1 and four ‘micro options’ within Option 3 to be taken though to Stage 2 – Detailed Site Selection.

4.2.3 Stage 2 – Detailed Site Selection

This project is currently at the detailed site selection stage and seeks to identify a preferred substation site. This study has involved the following four key tasks;

- Identification of the baseline situation;
- Identification of alternative substation options;
- Environmental analysis of substation options; and
- Identification of a preferred substation option.

4.3 Area of Search

The area of search is on the periphery of the existing Knocknagael substation due to the need for the connection directly into the substation.

4.4 Baseline Conditions

The following information sources have informed the desk based baseline study to identify potential environmental constraints within and adjacent to the sites:

- Identification of environmental designated sites and other constraints, utilising GIS datasets available via Nature Scot Site Link and other sources. These include:
  - Special Areas of Conservation (SAC);
  - Special Protection Areas (SPA);
  - Proposed Special Protection Areas (pSPA);
  - Sites of Special Scientific Interest (SSSI);
  - National Scenic Area (NSA);
  - Wild Land Areas (WLA);
  - Royal Society for the Protection of Birds (RSPB) reserves;
  - Land capability for agriculture;
  - Geological Conservation Review Sites;
  - Carbon-rich soil, deep peat and priority peatland habitats; and
  - Areas at risk of flooding (SEPA flood map[5]).
- Identification of archaeological designations and other recorded sites, utilising GIS datasets available via Historic Environment Scotland Data Services and Local Historic Environment Teams. These include:
  - World Heritage Sites (WHS) and buffers;
  - Scheduled Monuments;
  - Category A, B and C listed buildings; and
  - Gardens and Designed Landscapes (GDL).
- Review of the Highland Wide Local Development Plan (2012) to identify local policies and further environmental constraints and opportunities, such as Local Nature Conservation Sites (LNCS), core paths or other locations important to the public;
- Review of landscape character assessments of relevance to the Study Area;
- Review of Ordnance Survey (OS) mapping (1:50,000 and 1:25,000 and online GIS data sources from OS OpenData) and aerial photography (where available) to identify other potential constraints such as settlement, properties, walking routes, cycling routes etc.;

(5) http://map.sepa.org.uk/floodmap/map.htm

- Extrapolation of OS Vectormap GIS data to identify further environmental constraint including locations of watercourses and waterbodies, roads classifications and degree of slope; and
- Review of other local information through online and published media such as tourism sites.

4.5 Site Identification and Selection Methods

Eight sites have been appraised based on SSEN Transmission guidance; Substation Site Selection Procedures for Voltages at or above 132 kV. This includes Annex A; Holford Rules: Supplementary Notes of the Siting of Substations. The following considerations have been taken into account during site selection:

- Respect areas of high amenity value and take advantage of the containment of natural features such as woodland, fitting in with the landscape character of the area;
- Take advantage of ground form with the appropriate use of site layout and levels to avoid intrusion into surrounding areas;
- Use space effectively to limit the area required for development, minimising the effects on existing land use and rights of way;
- Alternative designs of substations may also be considered, e.g., ‘enclosed’, rather than ‘open’, where additional cost can be justified;
- Consider the relationship of towers and substation structures with background and foreground features, to reduce the prominence of structures from main viewpoints; and
- When siting substations take account of the effects of line connections that will need to be made.

4.6 Appraisal Method

4.6.1 Environmental

Appraisal of site options has involved systematic consideration against the following environmental topic areas:

- Natural Heritage - Designations, Protected Species, Habitats, Ornithology and Geology, Hydrology and Hydrogeology;
- Cultural Heritage - Designations and Cultural Heritage Assets;
- People – Settlements, Visual and Physical Effects;
- Landscape - Designations and Character; and
- Land Use - Agriculture, Forestry and Recreation).

Environmental sensitivity has been considered qualitatively, based on professional judgement and utilising the red, amber, green (RAG) rating. It has been applied to each topic area indicating potential impacts.

4.6.2 Engineering

Appraisal of site options has involved systematic consideration against the following engineering topic areas:

- Connectivity - Connection Feasibility, Outages, Extension Feasibility, Network Interfaces and LVAC Supplies;
- Footprint Requirements - Technology Solution, Adjacent Land Use and Space Availability;
- Hazards - Unique Hazards and Existing Utility Diversions;
- Ground Conditions - Topography, Superficial Deposits and Geology;
- Environmental Conditions - Elevation, Salt Pollution, Flooding, Carbon Footprint, SF6 Gas and Contaminated Land and Noise;
- Construction Access - Construction Access and Transformer Delivery Route; and
- Operation and Maintenance – Access Operation and Maintenance.

4.6.3 Economic

Appraisal of site options involves systematic consideration against the following economic topic areas:

- **Capital** - construction; diversions; public road improvements; felling; land assembly
- **Operational** – inspections; maintenance

The key consideration in the economic appraisal is the scale of varying options. Due to the similar nature of the extension options (see section 8) an economic appraisal was not undertaken. All options are considered comparable in terms of capital and operational costs.

4.6.4 Comparative Appraisal

A RAG rating has been applied to each topic area within each section indicating potential impacts. This rating is based on a four-point scale as follows:

Performance	**Comparative Appraisal**	
Most Preferred	**No Impact**	Negligible, or no potential effects
	Lower Impact	Potentially minor effects, with little or no requirement for mitigation
	Moderate Impact	Potentially moderate effects subsequent to appropriate mitigation
Least Preferred	**Higher Impact**	Potentially major effects which may be difficult to mitigate

4.6.5 Identification of a Preferred Sites

Following review of all of the potential site options, these have been considered in combination to arrive at preferred site options. The overall objective throughout the appraisal of site options has been to take full consideration of all environmental factors to minimise any potential adverse impacts on the environment whilst taking into account technical and cost considerations.

5. THE CONSULTATION PROCESS

5.1 Overview

In accordance with the SSEN Transmission guidelines, a process of consultation on the preferred alignment and site options was implemented. This section identifies the methods of consultation and the key dates when consultation took place.

5.2 Methods of Consultation

Following identification of a preferred alignment and site, a consultation document was produced and distributed for comment in January 2023. The consultation document describes the need for the project development and the rationale for the preferred alignment and site.

The consultation process comprised the following:

- Key statutory and non-statutory stakeholders were consulted by email on 6th December 2023 ahead of the public consultation event with a request for comments. The consultation event booklet and a link to the project website were shared in the email along with a note explaining the Consultation Document would be available at the project website in January 2023;
- The Consultation Document was made available on the SSE website at https://www.ssen-transmission.co.uk/projects/red-john-pump-storage-scheme-275kv-connection/ from 19th January 2023;
- A summary information leaflet was made available during the public exhibition detailed below; and
- A public exhibition was held at Green Drive Hall, Inverness on 7th December 2022 between 14:00 and 19:00. A further public event will be held in Spring / Summer 2023 prior to submission of the relevant planning consent application.

The consultation period closed on 17th February 2023. Responses were received via a variety of methods, including completed feedback forms, emails and written letters.

5.3 Consultees

Table 5.1 lists the statutory and non-statutory organisations invited to consider the Consultation Document.

Table 5.1: List of Statutory and Non-Statutory Consultees

Statutory Consultees	
NatureScot	Historic Environment Scotland (HES)
The Highland Council	Scottish Environment Protection Agency (SEPA)
Transport Scotland	
Non-Statutory Consultees	
Scottish Water	Scottish Forestry
RSPB Scotland	Forestry and Land Scotland
Sustrans Scotland	Fisheries Management Scotland
British Horse Society	Ministry of Defence (MOD)
John Muir Trust	Mountaineering Scotland
Scottish Wildlife Trust	Scottish Rights of Way and Access Society (ScotWays)
Visit Scotland	Scottish Wild Land Group (SWLG)
Highland Raptor Study Group	Scottish Raptor Study Group
Ness District Salmon Fishery Board	
Community Councils, Politicians and Others	
Dores and Essich Community Council	Strathdearn Community Council
Lochardil and Drummond Community Council	Strathnairn Community Council

Stratherrick and Foyers Community Council	Holm Community Council

5.4 Public Consultation

Consultation on the project included a face-to-face public engagement event. The purpose of this event was to provide information and to seek the views and comments of members of the public, local stakeholders and statutory consultees. The event took place on the 7th December 2023 at Green Drive Hall, Inverness from 14:00 to 19:00.

The consultation material was made available in booklet format at the event and online, allowing members of the public and opportunity to access and view the material until the feedback period closed on 17th February 2023.

6. CONSULTATION RESPONSES AND KEY ISSUES

6.1 Summary of Comments

In total, eight consultation responses were received during the consultation process. A list of the statutory and non-statutory consultees who responded is set out in **Table 6.1**. No written responses were received from the public from the second public event (December 2022).

Three consultation responses were received between the first (held in April 2022) and second public events. One was from a member of the public, a second from an involved landowner and the third from the MOD. These responses are captured in this document.

Table 6.1: Statutory and Non-Statutory Consultee Respondents

The Highland Council	NatureScot
HES	Scottish Water
MOD	Transport Scotland

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

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

Consultees provided a response on the preferred alignment and site options and identified opportunities or any potential issues.

6.2 Issues Emerging from Consultation Feedback

Responses covered a range of topics and raised specific issues in relation to the preferred alignment but not the site option. A number of respondents expressed 'in principle' support for the preferred alignment and site options.

Common themes emerging from the consultation responses received related to:

- Landscape and Visual;
- Forestry;
- Ecology;
- Hydrology and Hydrogeology;
- Cultural Heritage;
- Traffic and Transport;
- Noise; and
- Planning

7. PROJECT RESPONSES TO CONSULTATION RECEIVED

7.1 Introduction

This section documents how the preferred alignment and site set out within the Consultation Document has subsequently responded to the issues emerging from the consultation feedback.

7.2 Design Responses

7.2.1 Alignment Variation 1

Variation 1 deviates from the preferred alignment, heading north-east from General Wade's Military Road between two areas of woodland. It then passes north over Essich Road and continues on this alignment to the east of Knocknaegal Substation (see **Appendix A, Figure 3**).

It was proposed in response to a battery storage site planning application between General Wade's Military Road and Essich Road. Variation 1 offers potential benefits in terms of reducing impacts to breeding bird habitat, woodland and non-designated heritage assets however there are two prehistoric hut circles, which would require excavation by watching brief.

Variation 1 offers an alternative route around the battery storage application and is selected as preferred.

7.3 Proposed Alignment

The Proposed Alignment is shown in **Appendix A, Figure 3**. The Proposed Alignment follows Variation 1 described above. It is considered that the Proposed Alignment has responded to comments and concerns raised during the consultation process.

7.4 Responses Relevant to Subsequent Environmental Appraisal

Some consultation responses related to specific environmental issues appropriate to consider when defining and delivering the scope of the Proposed Development.

Table 7.1 summarises the environmental issues raised, with relevance to the Proposed Development and the SSEN Transmission response. **Appendix F** summarises the feedback received from each consultee and the responses set out by SSEN Transmission at the previous stage of consultation (April and May 2022).

Table 7.1: Statutory and Non-Statutory Consultee Responses

Topic	Comment received	SSEN Transmission Response
Landscape and Visual	<u>Landscape</u> The THC Landscape Officer stated that the northern part of the extension to the Knocknagael site has potential to increase visibility of the site as a whole, both from the immediately adjacent road and from the wider area. LVIA work should include visibility mapping to inform the iterative design stages and help ensure the best possible landscape fit for the development. The applicants should consider whether the elevation of the northern extension requires to match the existing platform elevation, of whether there is scope to work at a lower level in this area. As the local topography drops away to the north, the extent of earthworks required to match the existing platform height are likely to contribute to increased prominence of the extension area. The mapping included at pre-application did not show contour data much beyond the current northern extent of the site, to demonstrate the landscape fit of any proposed earthworks, it will be appropriate for the eventual application to include a wider contour plan which show the site in relation to local topography. At whatever height the northern extension is developed, the earthworks should be designed to be sympathetic to the local landscape, and this may require a larger land take than a design which solely optimises for civil engineering constraints, this would also apply to the southern extension area. It is also noted that an access track exists around the northern edge of the existing platform. The application should make clear whether this access needs to be retained and how it is to be accommodated or replaced. The area of the northern extension is currently under partial tree cover, the application proposals should include for replacement of any trees lost, preferably within or local to, the development site. As discussed at the pre-application meeting, where the cabling runs adjacent to the revised road alignment due to the Red John proposal, the applicant should seek to minimise disruption to the ground by co-ordinating construction activities with that developer. Full details of soft landscape works at the substation site as well as restoration proposals for the cable routes will be required. <u>Visualisations</u>	Visualisations will be prepared to support the application including those from the viewpoints recommended following consultation with THC. SSEN Transmission have prepared a Zone of Theoretical Visibility (ZTV) for the substation extension and a list of viewpoints identified. Photomontages will be submitted with the consent application to allow this to be fully appraised. In addition, SSEN Transmission will provide a Landscape Plan and a Landscape Maintenance Plan that will show how it is proposed to soften views onto the proposed development.

Topic	Comment received	SSEN Transmission Response
	The landscape and visual impacts are important matters which need to be addressed and demonstrated in the planning application. The inclusion of visualisations would be welcomed and are expected to accord with the principles set out within the Council's Visualisation Standards for Wind Energy Developments, with aspects of this guidance being applicable to other forms of development. Assessments should cover impacts of all elements of the development. The VPs should be from the public road near to the site and in particular from the high point on the public road when looking north towards the site.	
	Naturescot stated that the proposal does not raise landscape issues of national interest in terms of: • significant adverse effects on the integrity and objectives of designation of a National Scenic Area • significant adverse effects on Special Landscape Qualities of a National Park • significant adverse effects on the qualities of a Wild Land Area • landscape issues in the wider countryside	No further action required.
Forestry	The THC Forestry Team noted from the slide presentation that there were five initial options, and this has been narrowed down to option 1 and option 3. Options 2, 3, 4 & 5 appear to contain few trees but appear to be dominated by rough grassland, grazed pasture and gorse scrub. Option 1 appears to be partly open and scrub at the southern end and open mixed broadleaf woodland at the northern end. Part of Option 1 is recorded in the Native Woodland Survey of Scotland as Lowland mixed deciduous woodland of very high nativeness and semi- naturalness. These two factors together often indicate woodland of high biodiversity value, although this would need to be verified on site. The preferred Option 1 would appear to require the loss of an area of around 1.7ha of open native broadleaf woodland. This is likely to conflict with policies 51 and 52 of the HwLDP and NPF4 policy 6b), so the option should be reconsidered. If the applicant intends to pursue option 1 then they will need to carry out tree survey to BS 5837 and design the layout to minimise adverse impact on existing native woodland. Preferred Option 3 would appear to result in loss of some individual trees, but it appears the main tree grouping in the area sites between Option 2 and 3 so should be possible to retain it. This option could be accepted as long as there is adequate compensatory tree planting.	SSEN Transmission have completed a tree survey by a professional arboriculturist to BS5837:2012. From this a Tree Constraints Plan will be produced which will help to inform the layout of the site in order to minimise the impact on existing trees/ woodland. SSEN Transmission will also complete an Arboricultural Impact Assessment; a Tree Protection Plan and an Arboricultural Method Statement if works are proposed within or directly adjacent to Root Protection Areas. The results of this will be incorporated into the Environmental Assessment stage. In addition, SSEN Transmission will provide a Landscape Plan and Landscape Maintenance Plan to demonstrate mitigation to soften views onto the Proposed Development.

Topic	Comment received	SSEN Transmission Response
	Both sites have quite prominent locations in relation to the adjacent unclassified road, so landscape planting plans will be required to help screen and soften views onto the proposed development. Options 2, 3, 4 & 5 would clearly be THC's preference as they would have no adverse impact on woodland.	
Ecology	THC stated that matters relating to ecology that have been outlined by both NatureScot and the Councils Ecology officer. <u>Impacts upon Designated Sites - NatureScot</u> Both the Loch Ashie Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA) are protected because of the important numbers of gathering pre- and post-breeding Slavonian grebes they support. Slavonian grebes are a very rare breeding bird and Loch Ashie is the most important site in Britain for gathering pre- and post- breeding birds. Peak gathering times are usually April to mid-May in spring and in the autumn (September). The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") apply or, for reserved matters, The Conservation of Habitats and Species Regulations 2017. As the cable is to be undergrounded there will be no collision risk to the birds. The potential for disturbance to SPA birds during construction works should however be considered – current guidance would recommend a buffer of 150-350m around the SPA to mitigate the risk of disturbance. Based on the plans submitted the underground cable is around 240m from the SPA/SSSI boundary. It would therefore be preferable for construction work to take place outside the sensitive periods for birds in passage (i.e., to avoid April to mid-May and September). The loch has historically been used by breeding birds but is not thought to be being used currently. NatureScot recommend that the applicants confirm with the RSPB that this situation has not changed. If watercourses draining to the loch could be affected, NatureScot recommend a high standard of pollution and silt prevention measures are adopted so as to mitigate any risk of adverse changes to water quality. <u>Impact on Protected Species - NatureScot</u> NatureScot refer the applicants to the advice on our website relating to protected species. This contains detailed advice on protected species survey methods (including timing of	During the Environmental Assessment stage, SSEN Transmission will assess the potential impact of the route on SPA qualifying species. A Habitat Regulations Appraisal will be undertaken. Avoidance of construction during April – May and September will be factored into the construction programme and achieved if practicable. BNG assessment and reporting has been undertaken for the alignment and site selection stage. This will be refined and updated through the Environmental Assessment stage. A data request to RSPB and the Highland raptor study group has been submitted and the results of which will be included as part of the Environmental Assessment stage. Once the data has been received it will also determine whether a further raptor survey is required. SSEN Transmission will complete a Biodiversity Enhancement and Management Plan as part of the Environmental Assessment stage.

Topic	Comment received	SSEN Transmission Response
	surveys, survey area and shelf-life), Species Protection Plans, mitigation and licence applications. If construction work was planned during the bird breeding season consideration of breeding birds would also be required. <u>Impact on Protected Species - THC Ecologist</u> At this stage no ecological/environmental information has been submitted and therefore the THC Ecologist cannot give detailed advice on the ecological/environmental aspect of the proposal. Further advice will be given at the scoping stage of the development but as a general guide the following information is recommended: A full assessment of the ecology of the site and a suitable buffer around the site needs to be undertaken to determine if there are any ecological/environmental constraints associated with the proposed development. The assessment should include (but not be limited to): • Desk study records, from NatureScot Sitelink, the NBN atlas and local biodiversity record groups; • Specific surveys of the site to identify any protected species, priority habitats and priority species, including those listed within the Highland Nature Biodiversity Action Plan to fulfil Policies 57-60 of the Highland Wide Local Development Plan; • Assessment of ecological effects; and • Relevant mitigation and compensation measures. Raptors are known to be present within the area of the cable route and therefore it is advised that the raptor groups and the RSPB are contacted for desk study records, in addition to a specific raptor survey being undertaken. <u>Biodiversity Enhancement</u> The proposed development will need to accord with the policies of NPF4 including Policy 3, which requires that all developments must deliver not just ecological mitigation and compensation but also biodiversity enhancement of the site. As this is a Major development Policy 3b is applicable to this development. In order to satisfy Policy 3b a Biodiversity Enhancement and Management Plan that details how criteria i to v above will be met will be required in addition to the Ecology/Environmental Assessment. This will demonstrate that the development will significantly enhance the biodiversity of the site, from its pre- development state. Where the	

Topic	Comment received	SSEN Transmission Response
	Biodiversity Enhancement and Management Plan is unable to demonstrate to the satisfaction of the planning authority that the development will conserve, restore and enhance biodiversity, the proposal will not be supported. The Biodiversity Enhancement and Management Plan must demonstrate to the satisfaction of the planning authority that the development will accord with Policies 57-60 of the HwLDP. The Biodiversity Enhancement and Management Plan will be carried out by a suitably qualified and experienced consultant. In rare cases where site constraints result in the applicant being unable to deliver one or more of the above criteria, consideration may be given to developer contributions as to enable biodiversity enhancements to be implemented elsewhere in line with the mitigation hierarchy to allow offset, off-site measures.	
Hydrology and Hydrogeology	THC stated that if any new infrastructure is located at a position potentially at risk of flooding a Flood Risk Assessment (FRA) should be submitted to demonstrate that the infrastructure will not be at risk (or will remain operational during a flood) and that the development will not increase flood risk elsewhere. The FRA shall consider the impact of a 1 in 200 year plus climate change return period flood event. THC stated that a Drainage Impact Assessment (DIA) written in accordance with our Supplementary Guidance: Flood Risk and Drainage Impact Assessment, is required to be submitted with the planning application.	SSEN Transmission will submit an FRA and Drainage Impact Assessment alongside the planning application for the substation extension.
	A response was received which noted the potential to impact the private water supplies at the Drumashie Farm.	SSEN Transmission are aware of the private water supplies at Drumashie Farm, having confirmed the location in a recent site visit. These will be further considered at the Environmental Assessment stage.
	Scottish Water noted that the Red John Project is High Risk due to the scale of the project and they embrace the opportunities to work with all developers involved in the project and it's various stages. <u>Drinking Water Protected Areas</u> Scottish Water noted there are no drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area where the substation is to be located.	During the Environment Appraisal stage of the project, SSEN Transmission will consult further with Scottish Water to identify the most appropriate mitigation to protect water quality. SSEN Transmission will review the Scottish Water Asset Plans and confirm any that would be potentially affected by

Topic	Comment received	SSEN Transmission Response
	Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. The route cuts through from one of Scottish Waters historic catchments Dores, which is no longer is use, to the Loch Ashie catchment which supplies Inverness Loch Ashie Water Treatment Works (WTW). It is essential that water quality and water quantity in the area are protected during the activity and in the event of an incident occurring that could affect Scottish Water, we should be notified without delay using the Customer Helpline number 0800 0778 778. Like the other aspects of the project this activity presents a risk to water quality and therefore Scottish Water would request further involvement at the more detailed design stages, to determine the most appropriate proposals and mitigation within the catchment to protect water quality and quantity. In particular Scottish Water need to understand how the work will be carried out and how water will be managed on site as well as how the risk of contamination from hydrocarbons etc will be mitigated against. Scottish Water have produced a list of precautions for a range of activities. These documents detail protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm. The fact that this area is located within a drinking water catchment should be noted in future documentation. Also anyone working on site should be made aware of this during site inductions. Further information should be sent to the Sustainable Land Management team by contacting us via protectdwsources@scottishwater.co.uk. In particular at least 3 months ahead of any work commencing on site we should be contacted to be advised of the provisional start date so we can make arrangements for our Catchment Liaison Officer to attend site just as work begins to ensure mitigations in place are adequate and provide the site manager and other personnel with any additional information you may need while working in the catchment. <u>Scottish Water Assets</u> A review of Scottish Water records indicates that there are Scottish Water assets in the area. This should be confirmed however through obtaining plans from Scottish Water	the route. Contact would then be made with HAUC Diversions Team as required. Scottish Water has previously provided copies of its list of precautions which the Proposed Development will be required to adhere to.

Topic	Comment received	SSEN Transmission Response
	Asset Plan Providers. Details of our Asset Plan Providers are included in the SW list of precautions for assets, which can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm. All Scottish Water assets potentially affected by the activity should be identified, with particular consideration being given to access roads and pipe crossings. If necessary, local Scottish Water personnel may be able to visit the site to offer advice. All of Scottish Water's processes, standards and policies in relation to dealing with asset conflicts must be complied with. In the event that asset conflicts are identified then early contact should be made with the HAUC Diversions Team via the Development Services portal - www.scottishwater.co.uk/portal. All detailed design proposals relating to the protection of Scottish Water's assets should be submitted to the HAUC for review and written acceptance. Works should not take place on site without prior written acceptance by Scottish Water.	
Cultural Heritage	HES noted that that the preferred alignment presented on page 14 of the consultation booklet (December 2022) is located within the route corridor of Option B. HES can confirm that the preferred alignment would not have direct impacts on historic environment assets within our remit. As the preferred connection technology is via underground cable HES can confirm that the connection will not impact on the setting of any assets within our remit. HES noted the currently preferred option for the extension to the Knocknagael Substation as shown on page 12 of the consultation document (December 2022). HES can confirm that this option is not likely to have significant effects on the site or setting of historic environment assets within our remit. <u>Additional Comments</u> As noted in the HES response of 18 May 2022, there are three scheduled monuments located to the east of the preferred alignment. These are: • Carn Glas, chambered cairns 815m SE of Achvraid (SM 2392) • Achvraid, hut circles 800m SE of (SM 11786) • Achvraid, hut circles 1030m SSE of (SM 11561). HES noted that it is proposed that the works are undertaken via Permitted Development Rights as set out in The Town and Country Planning (General Permitted Development) (Scotland) Order 1992 and therefore will not require planning permission. As you will be	SSEN Transmission note the need for Scheduled Monument Consent where appropriate as the Carn Glas, chambered cairns 815m SE of Achvraid is 610m south of the Proposed Development.

Topic	Comment received	SSEN Transmission Response
	aware, while the proposals may not require planning consent this does not remove the need for other consents such as scheduled monument consent. Scheduled Monument Consent is required for any works that would demolish, destroy, damage, remove, repair, alter or add to a monument, or to carry out any flooding or tipping on a scheduled monument. Historic Environment Scotland determine applications for Scheduled Monument Consent, with the exception of applications that Scottish Ministers call in for their own determination. In light of this, should works related to the construction of the preferred alignment have the potential to directly affect a scheduled monument we would encourage you to contact us at the earliest opportunity to discuss potential mitigation options.	
	The THC Historic Environment Team noted that this proposal crosses a landscape rich in upstanding remains and with high potential for the additional survival of buried remains. The upstanding remains of prehistoric houses survive adjacent to the existing substation and may be adversely impacted by development in this area. A walkover survey will be required in the first instance to inform the Cultural Heritage chapter of the Environmental Statement. The EIA will consider the potential direct impacts of the development to cultural heritage as well as indirect impacts. Where impacts are unavoidable, HET expect proposed methods to mitigate this impact to be discussed in detail, including both physical (for example, re-design or excavation and further recording) and where appropriate, compensatory/off-setting.	SSEN Transmission has undertaken a walkover survey and a series of embedded mitigation methods will be proposed including the use of buffer zones, micrositing and demarcation. These are recommendations based on the current indicative design and it is anticipated that they can be considered in conjunction with input to the detailed design. SSEN Transmission will consult with the THC Historic Environment Team on a final mitigation strategy ahead of any works taking place.
Traffic and Transport	THC stated that a Transport Assessment and CTMP is required and a contribution towards the South Loch Ness Road Strategy for Foyers Road maybe required. Potential cumulative issues with nearby developments also need to be fully explored and addressed. An assessment of the impact of this development on public access should be made. Mitigation measures should be identified to minimise the detrimental impacts and maximise public access.	A Transport Statement and CTMP will be produced to set out proposed traffic and transport details of the Proposed Development.
	Transport Scotland stated that their preferred route is located south of Inverness and northeast of Loch Ness, with the nearest connection to the A82(T) being approximately 6.3 km to the north. Consequently, the comments provided at the routeing stage remain valid and Transport Scotland has no further comment to make at this stage. The comments at routeing stage	

Topic	Comment received	SSEN Transmission Response
	were that as the options will not impact on the trunk road network, Transport Scotland had no opinion to offer on either the route options or the substation site options. However it should be noted that Transport Scotland will require to be consulted on any subsequent application for the proposed connection, with any potential transport related impacts being assessed and mitigated. A transport statement should also be submitted with any future application.	
	A response was received relating to the management of construction traffic and access for the Red John Pump Storage Scheme.	Although the issues raised do not specifically relate to this project, SSEN Transmission will produce a Transport Statement and CTMP as part of the Proposed Development.
Noise	<u>Noise Impacts – Construction: THC Environmental Health Team</u> It is understood that the proposed underground cable works will be permitted development but there will still be construction work at the substation. The applicant should be aware that regardless of Planning requirements, our Service has powers under the Control of pollution Act 1974 to control the impact of construction noise. Generally, people are tolerant of construction noise during typical working hours which are taken to be 8am to 7pm Monday to Friday and 8am to 1pm on Saturdays. This includes construction traffic. Noisy work out-with these times is more likely to generate complaints, at which point our Service would be required to undertake an investigation and consider whether restrictions are appropriate. Works for which noise is inaudible at the curtilage of any noise sensitive property could still be carried out out-with these times. If the applicant intends to undertake noisy work out-with the aforementioned times, they will be required to submit a detailed construction noise assessment for the written approval of the planning authority. The assessment should include: 1) A description of construction activities with reference to noise generating plant and equipment. 2) A detailed plan showing the location of noise sources, noise sensitive premises and any survey measurement locations. 3) A description of any noise mitigation methods that will be employed and the predicted effect of said methods on noise levels. 4) A prediction of noise levels resultant at the curtilage of noise sensitive receptors. 5) An assessment of the predicted noise levels in comparison with relevant standards.	SSEN Transmission will consider noise impacts as part of the Environmental Appraisal.

Topic	Comment received	SSEN Transmission Response
	Regardless of whether a construction noise assessment is required, it is expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. The applicant will be required to submit a scheme demonstrating how this will be implemented. <u>Noise Impacts – Operational: THC Environmental Health Team</u> The proposed development will extend the existing substation site on two sides. The nearest noise sensitive receptors are Essich Farm Cottage, 365m to the NW and Horseshoe Cottage, 635m to the west. This Service has no record of any complaints about noise from the existing substation. Any application would require to be accompanied by a noise impact assessment which should include but is not limited to the following: - • A description of the proposed development in terms of noise sources. • A plan showing the location of noise sources, noise sensitive premises and survey measurement locations. • A survey of the background (LA90,T) ambient noise (LAeq,T), and 1/3rd octave band spectrum levels to determine the existing noise level in the area and at any nearby properties likely to be affected by the noise. Siting of monitoring equipment should ensure results are representative of the amenity for that location. To ensure that values are reliable and suitably represent the periods of interest, a minimum of 48 hours continuous background monitoring should be conducted at agreed locations. This should comprise of continuous measurements of normally not less than 15 min intervals which can be continuous or disaggregated. • A prediction of noise levels at neighbouring noise sensitive premises.	
Land Use	The THC Contaminated Land Team noted that there are no known potential contaminated land issues within the red line site boundary of planning application 22/04161/PREMAJ, other than the sites existing use as an electricity substation. As the proposed development does not involve a change of use, there is no comment to offer on the above application.	No further action required.
	MOD stated that as the application relates to a site outside of Ministry of Defence safeguarding areas, they can therefore confirm that the Ministry of Defence has no safeguarding objections to this proposal.	

Topic	Comment received	SSEN Transmission Response
Planning	It was noted that a planning application for a battery storage site south of the existing substation had been submitted. The current preferred alignment would pass through this site area.	SSEN Transmission have amended the proposed alignment to avoid the battery storage site.

8. CONCLUSION

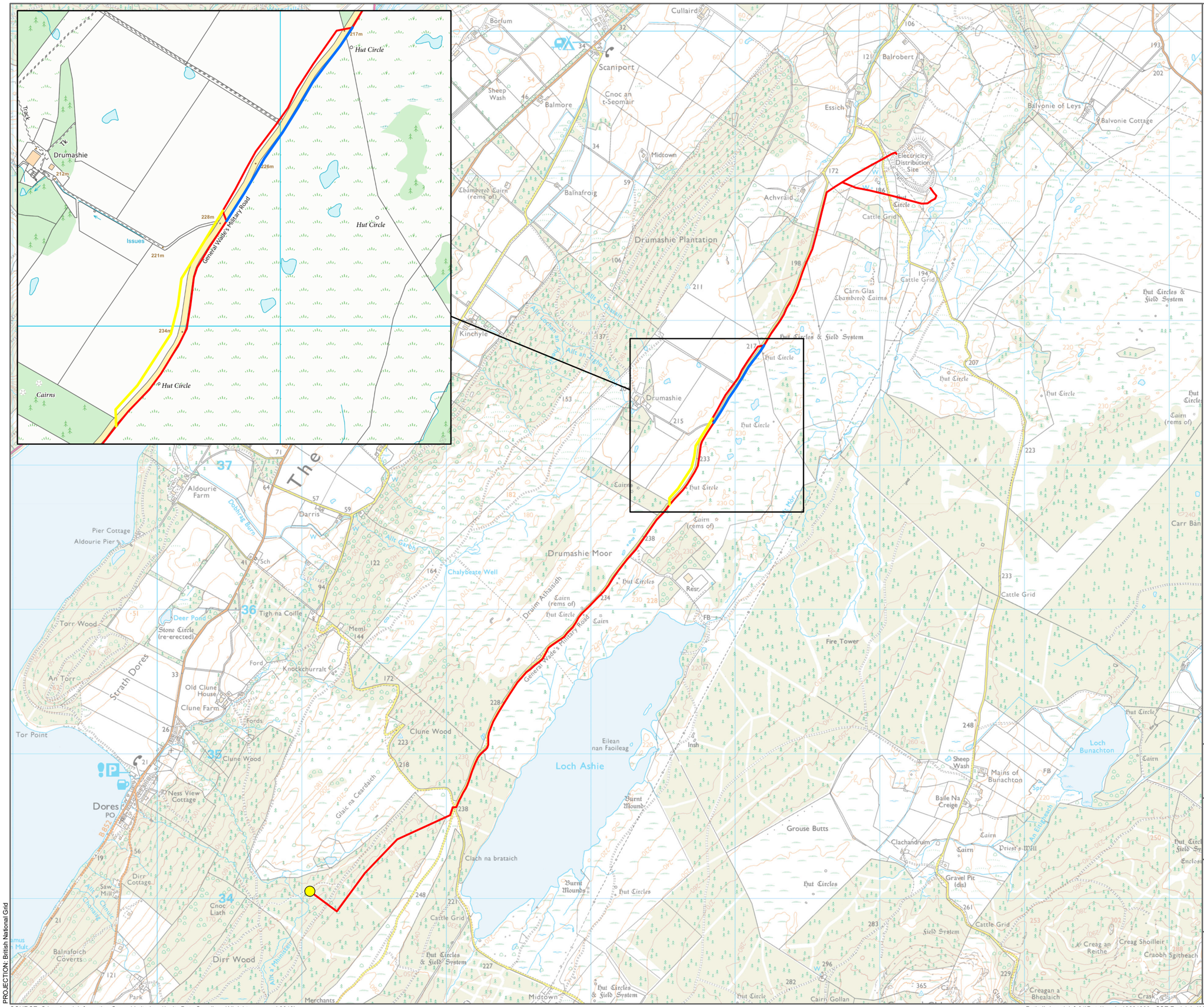
This Report on Consultation documents the consultation undertaken for the Proposed Development between December 2022 and February 2023. The programme of consultation was designed to engage with key stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents to invite feedback on the rationale for and approach to, the selection of the preferred alignment and site.

This report describes the key feedback received and details the actions taken and to be taken by SSEN Transmission in response to the comments provided.

The preferred site options to progress are NW3 and SE3. A variation to the preferred alignment has been developed and analysed in response to the planning application for the battery storage site. The resultant Proposed Alignment (see **Appendix A, Figure 3**) and site options will form the basis of the scope of the Environmental Assessment in support of the relevant planning consent process.

All comments and considerations to date will be taken forward into Stage 4: Consenting Process, and assessments carried out for all relevant environmental aspects. This process remains inclusive, seeking further consultation where appropriate.

APPENDIX A FIGURES



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Metres

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PROJECT: 0631293	CHECKED: ES
DATE: 09/12/2022	APPROVED:

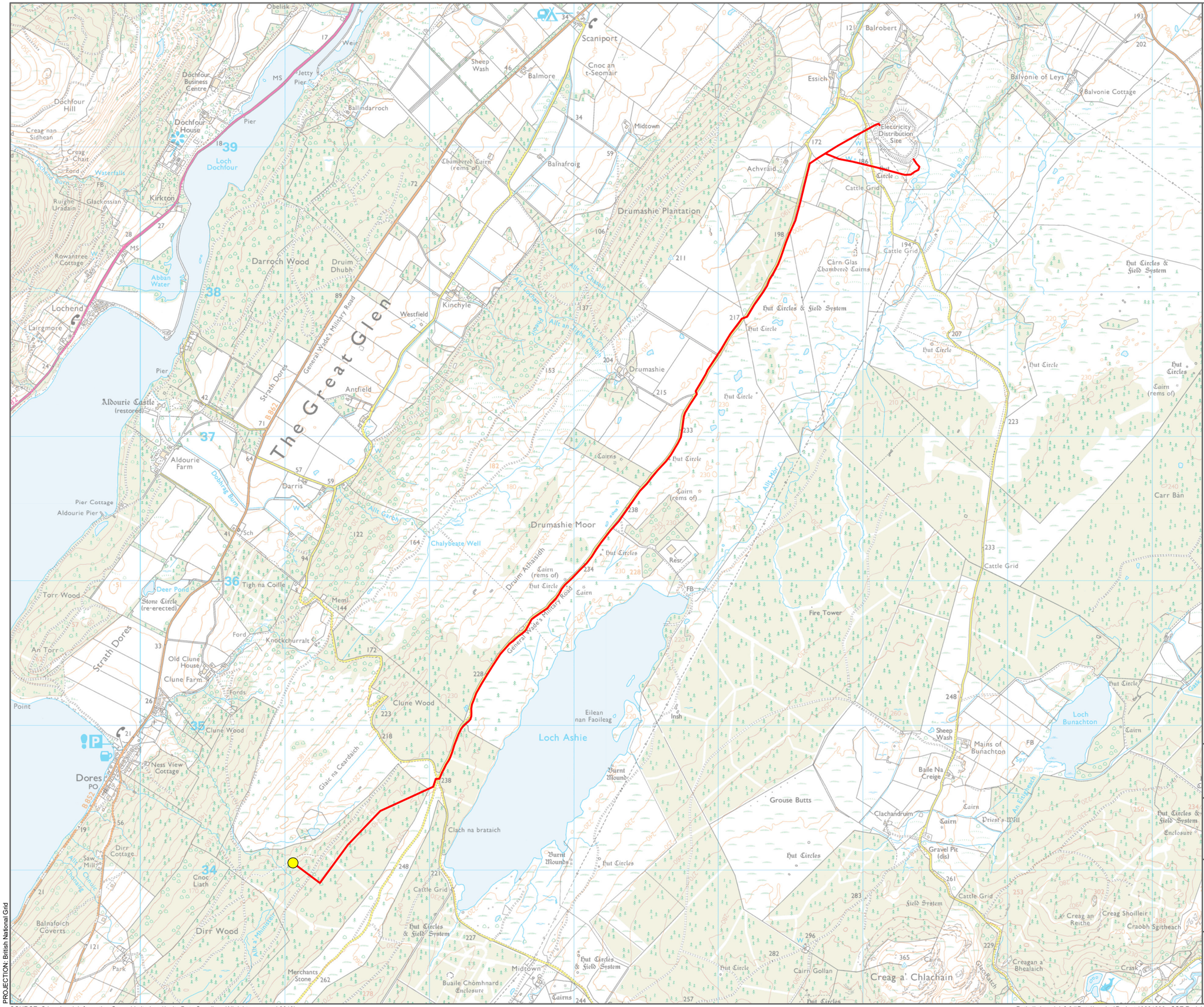
Figure 1
Red John Alignment Options

ERM

Scottish & Southern Electricity Networks
TRANSMISSION

PROJECTION: British National Grid

Path: \\uksprdgisfs01\Data\London\0631293 - SSE Red John\MAPS\0631293 - SSE Red John.aprx\0631293 - SSE Red John Proposed Alignment - A01



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Metres

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SIZE: A3	DRAWN: DN
PROJECT: 0631293	CHECKED: ES
DATE: 02/05/2023	APPROVED: SC

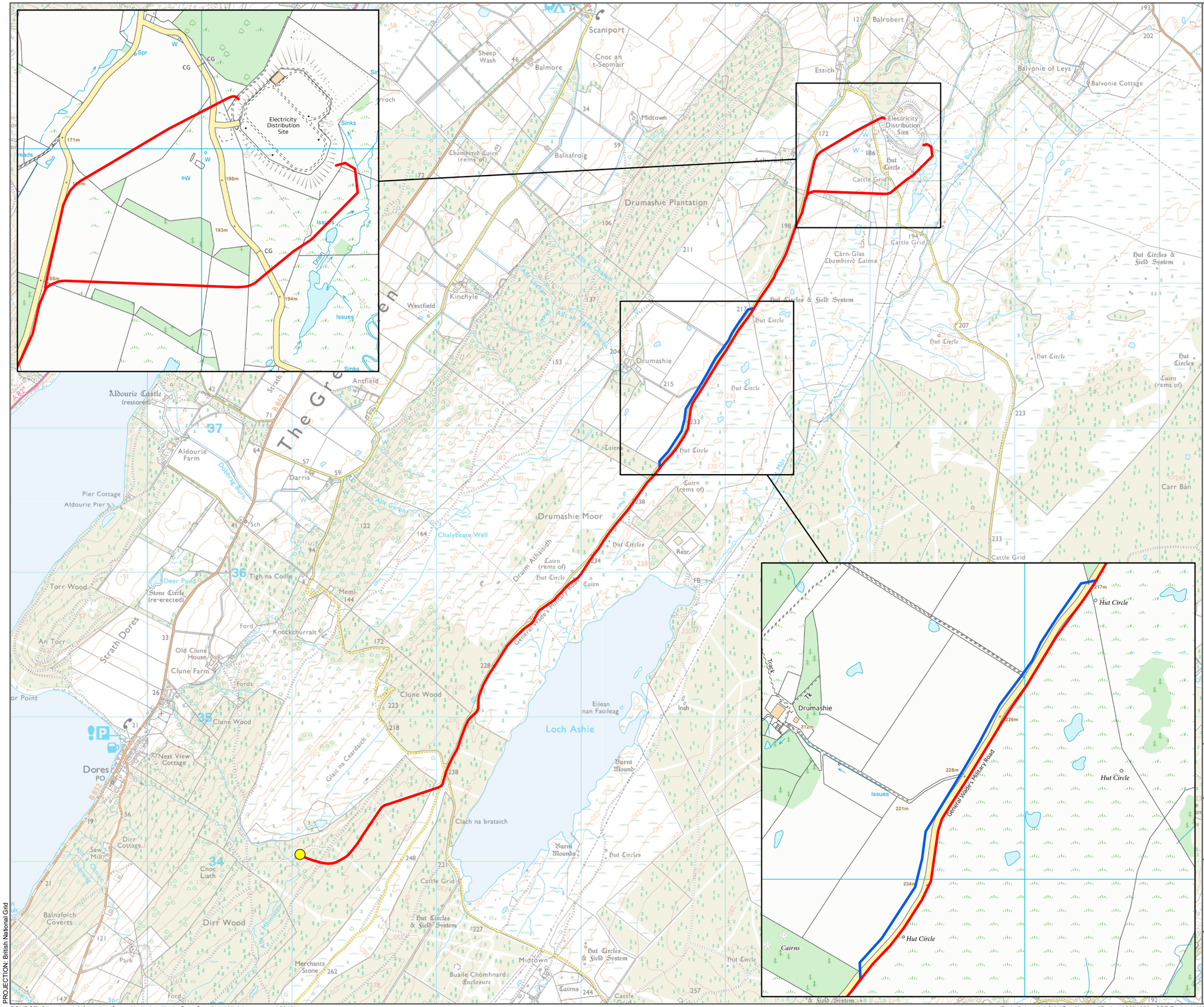
Figure 2
Red John Preferred Alignment

ERM

Scottish & Southern Electricity Networks
TRANSMISSION

PROJECTION: British National Grid

Path: \\uksprdgisfs01\Data\London\Projects\0631293 - SSE Red John\MAPS\0631293 - SSE Red John.aprx\0631293 - Red John Preferred Alignment - A01



Consented Red John PSS Switching Station

Proposed Alignment

Alternative Alignment

0 250 500 750 1,000

Metres

N

SCALE: See Scale Bar	VERSION: A02
SIZE: A3	DRAWN: DN
PROJECT: 0631293	CHECKED: ES
DATE: 02/05/2023	APPROVED:

Figure 3
Proposed Alignment

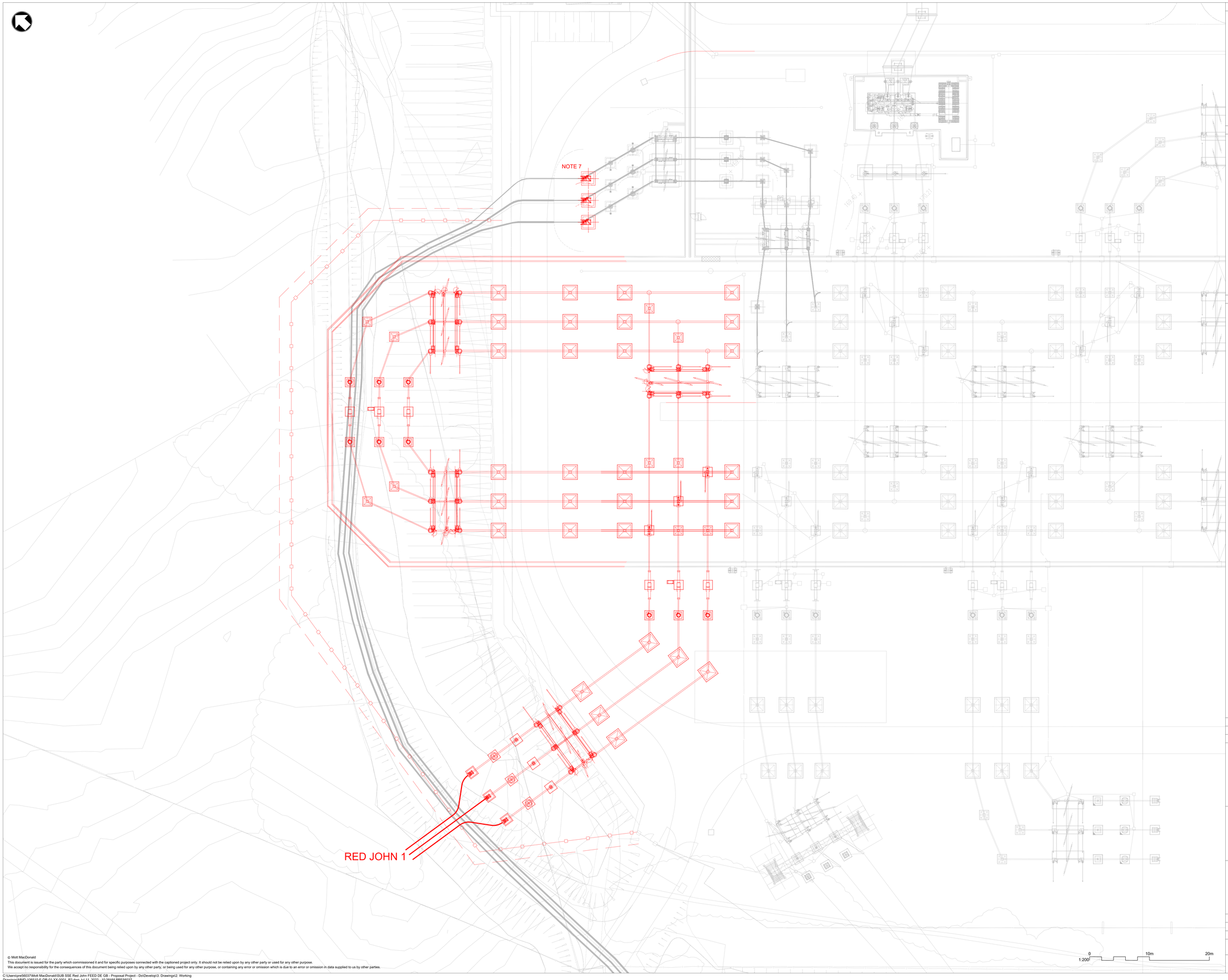
ERM

Scottish & Southern Electricity Networks
TRANSMISSION

PROJECTION: British National Grid

Path: \\uksprdgisfs01\Data\London\Projects\0631293 - SSE Red John\MAPS\0631293 - SSE Red John.aprx\0631293 - SSE Red John Proposed Alignment - A02

APPENDIX B NW SUBSTATION OPTIONS



Notes

1. ALL EXISTING INFORMATION BASED ON DRAWING N57_1110_1001_01_05 (KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES).
2. KNOCKANGAEL OPTION DRAWINGS SHOULD BE TREATED AS INDICATIVE ONLY AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES.
3. EQUIPMENT CLEARANCES TO BE VERIFIED DURING DESIGN DEVELOPMENT ONCE NATIVE AS BUILT FILES BECOME AVAILABLE.
4. KNOCKANGAEL SUBSTATION RATING 275kV 4000A 40KA 1s.
5. ALL SURVEY INFORMATION IS REFERENCED TO ORDNANCE SURVEY NATIONAL GRID OSGB36.
6. SUBSTATION COMPOUND TO BE EXTENDED TO ACCOMMODATE NEW BUSBARS AND BUS SECTIONS. CIVIL WORKS WILL BE REQUIRED TO CREATE A LEVEL GROUND AREA FOR THIS EXTENSION.
7. TOMATIN CMA2 CABLE TO BE REROUTED PRIOR TO EXTENSION WORKS.

Key to symbols

CT

CVT

SA

CSE

PI (LOW LEVEL)

PI (HIGH LEVEL)

Reference Documents

N57_1110_1001_01_05	KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES.

FOR INFORMATION

Rev	Date	Drawn	Description	Ch'k'd	App'd
P2	08/07/22	S.P.	FOR DISCUSSION	N.F.	H.S.
P1	15/03/22	S.P.	FIRST ISSUE FOR COMMENTS	N.F.	H.S.

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W mottmac.com

Client

Scottish & Southern Electricity Networks

Title

KNOCKNAGAEL EXTENSION
NORTHWEST OPTION 1 (NW1)
CONVENTIONAL BUS-COUPLER

Designed	N.Ferguson	N.F.	Eng check	H.Smith	H.S.
Drawn	S.Prentice	S.P.	Coordination		
Dwg check	N.Ferguson	N.F.	Approved	H.Smith	H.S.

Scale at A0	Status	Rev	Security
N.T.S.	PRE	P2	STD

Drawing Number

MMD-106510-E-DR-01-XX-0001

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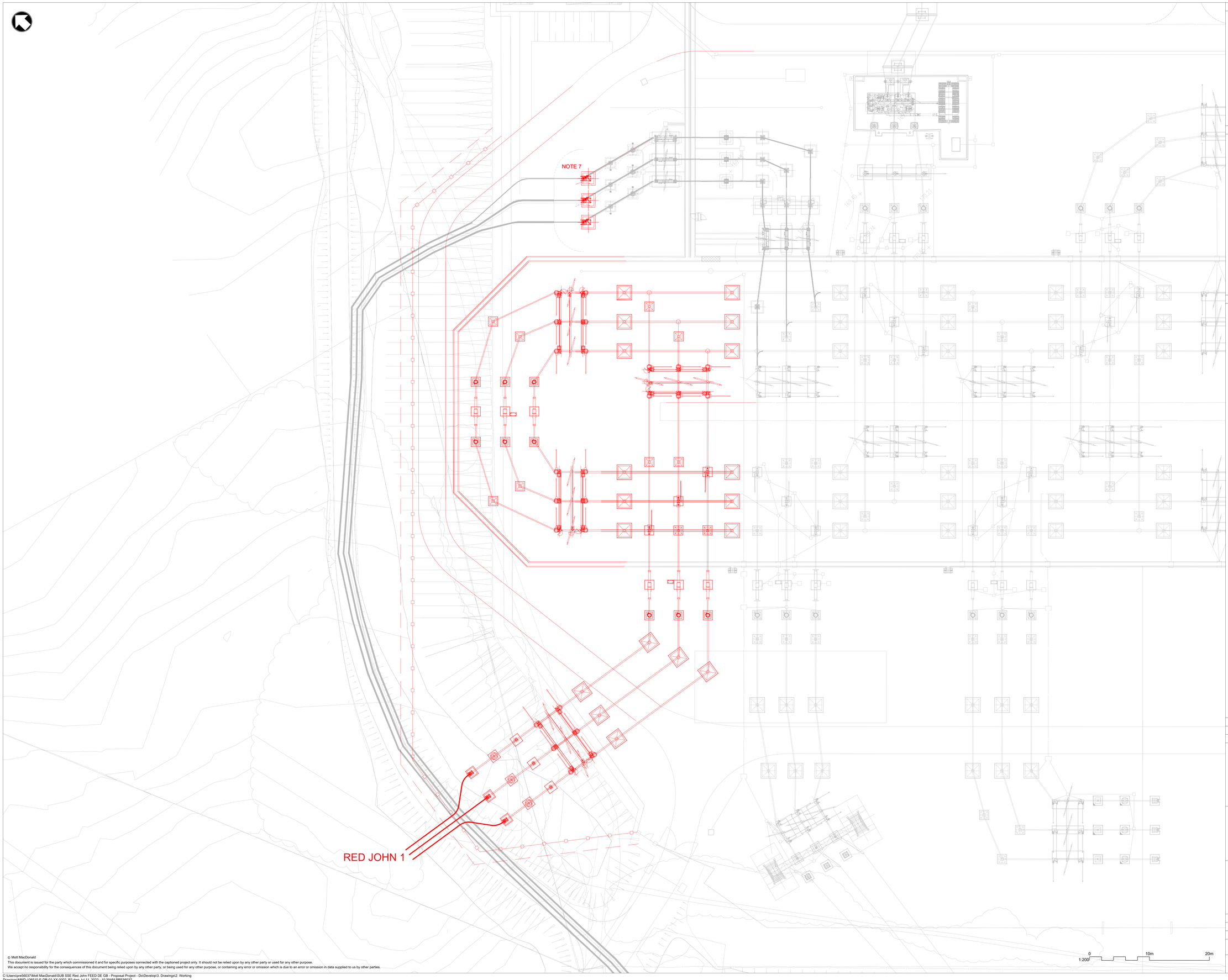
Drawings\MMD-106510-E-DR-01-XX-0001_P2.dwg Jul 11, 2022 - 10:36AM PRE56037



Notes

1. ALL EXISTING INFORMATION BASED ON DRAWING N57_1110_1001_01_05 (KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES).
2. KNOCKANGAEL OPTION DRAWINGS SHOULD BE TREATED AS INDICATIVE ONLY AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES.
3. EQUIPMENT CLEARANCES TO BE VERIFIED DURING DESIGN DEVELOPMENT ONCE NATIVE AS BUILT FILES BECOME AVAILABLE.
4. KNOCKANGAEL SUBSTATION RATING 275kV 4000A 40KA 1s.
5. ALL SURVEY INFORMATION IS REFERENCED TO ORDNANCE SURVEY NATIONAL GRID OSGB36.
6. SUBSTATION COMPOUND TO BE EXTENDED TO ACCOMMODATE NEW BUSBARS AND BUS SECTIONS. CIVIL WORKS WILL BE REQUIRED TO CREATE A LEVEL GROUND AREA FOR THIS EXTENSION.
7. TOMATIN CMA2 CABLE TO BE PROTECTED / REROUTED AS APPROPRIATE PRIOR TO EXTENSION WORKS.

Key to symbols

- CT
- CVT
- SA
- CSE
- PI (LOW LEVEL)
- PI (HIGH LEVEL)

Reference Documents

N57_1110_1001_01_05	KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES.

FOR INFORMATION

Rev	Date	Drawn	Description	Ch'k'd	App'd
P2	08/07/22	S.P.	FOR DISCUSSION	N.F.	H.S.
P1	15/03/22	S.P.	FIRST ISSUE FOR COMMENTS	N.F.	H.S.

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Client

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Title

KNOCKNAGAEL EXTENSION
NORTHWEST OPTION 2 (NW2)
CONVENTIONAL BUS-COUPLER
NEW PERIMETER ROAD

Designed	N.Ferguson	N.F.	Eng check	H.Smith	H.S.
Drawn	S.Prentice	S.P.	Coordination		
Dwg check	N.Ferguson	N.F.	Approved	H.Smith	H.S.

Scale at A0	Status	Rev	Security
N.T.S	PRE	P2	STD

Drawing Number
MMD-106510-E-DR-01-XX-0002

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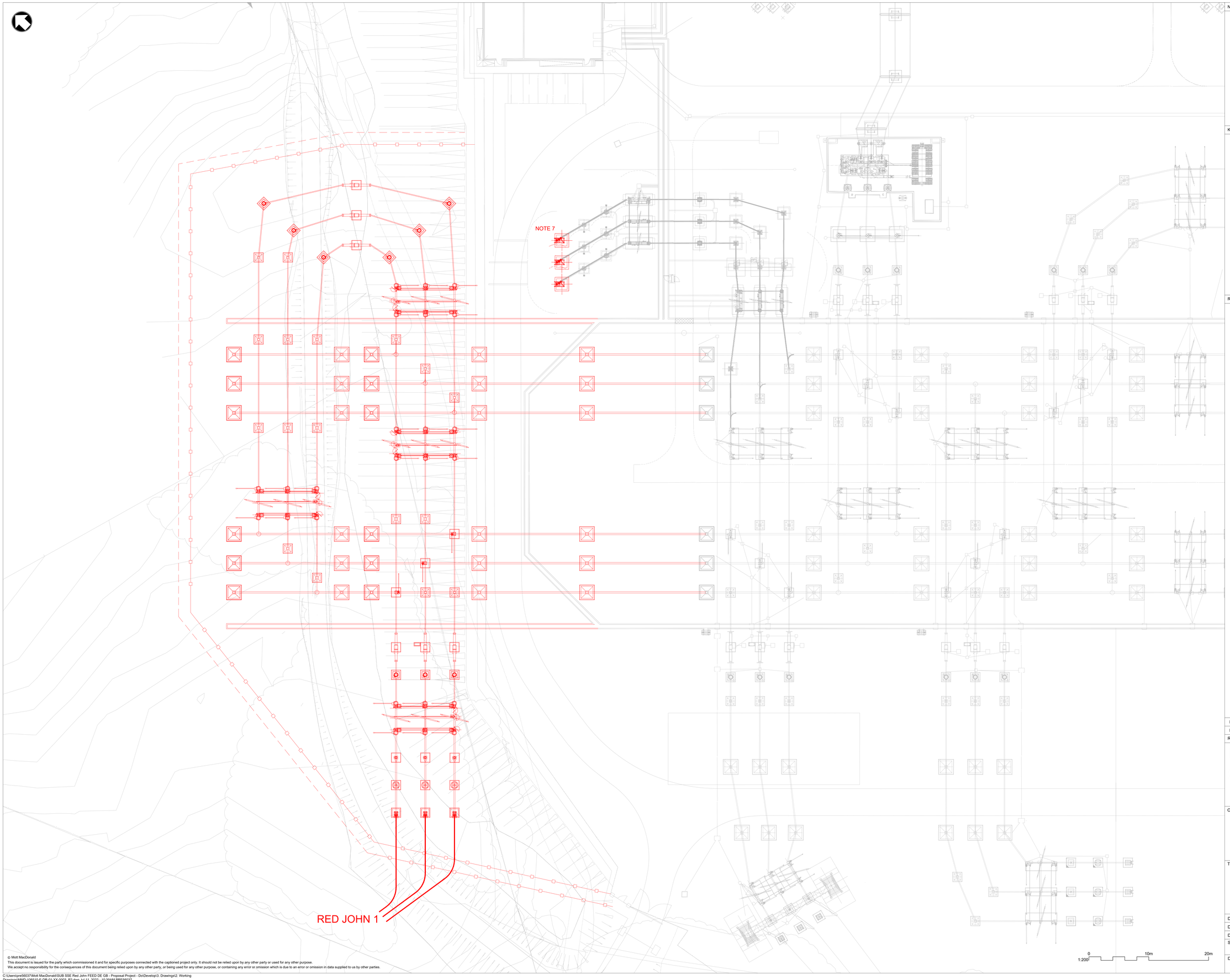

Notes

1. ALL EXISTING INFORMATION BASED ON DRAWING N57_1110_1001_01_05 (KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES).
2. KNOCKANGAEL OPTION DRAWINGS SHOULD BE TREATED AS INDICATIVE ONLY AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES.
3. EQUIPMENT CLEARANCES TO BE VERIFIED DURING DESIGN DEVELOPMENT ONCE NATIVE AS BUILT FILES BECOME AVAILABLE.
4. KNOCKANGAEL SUBSTATION RATING 275kV 4000A 40KA 1s.
5. ALL SURVEY INFORMATION IS REFERENCED TO ORDNANCE SURVEY NATIONAL GRID OSGB36.
6. SUBSTATION COMPOUND TO BE EXTENDED TO ACCOMMODATE NEW BUSBARS AND BUS SECTIONS. CIVIL WORKS WILL BE REQUIRED TO CREATE A LEVEL GROUND AREA FOR THIS EXTENSION.
7. TOMATIN CMA2 CABLE TO BE REROUTED PRIOR TO EXTENSION WORKS.

Key to symbols

- CT
- CVT
- SA
- CSE
- PI (LOW LEVEL)
- PI (HIGH LEVEL)

Reference Documents

N57_1110_1001_01_05	KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES.

FOR INFORMATION

Rev	Date	Drawn	Description	Ch'k'd	App'd
P2	08/07/22	S.P.	FOR DISCUSSION	N.F.	H.S.
P1	15/03/22	S.P.	FIRST ISSUE FOR COMMENTS	N.F.	H.S.

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Client

Scottish & Southern Electricity Networks

Title

KNOCKNAGAEL EXTENSION
NORTHWEST OPTION 3 (NW3)
EXTENDABLE BUS COUPER

Designed	N.Ferguson	N.F.	Eng check	H.Smith	H.S.
Drawn	S.Prentice	S.P.	Coordination		
Dwg check	N.Ferguson	N.F.	Approved	H.Smith	H.S.

Scale at A0	Status	Rev	Security
N.T.S.	PRE	P2	STD

Drawing Number

MMD-106510-E-DR-01-XX-0003

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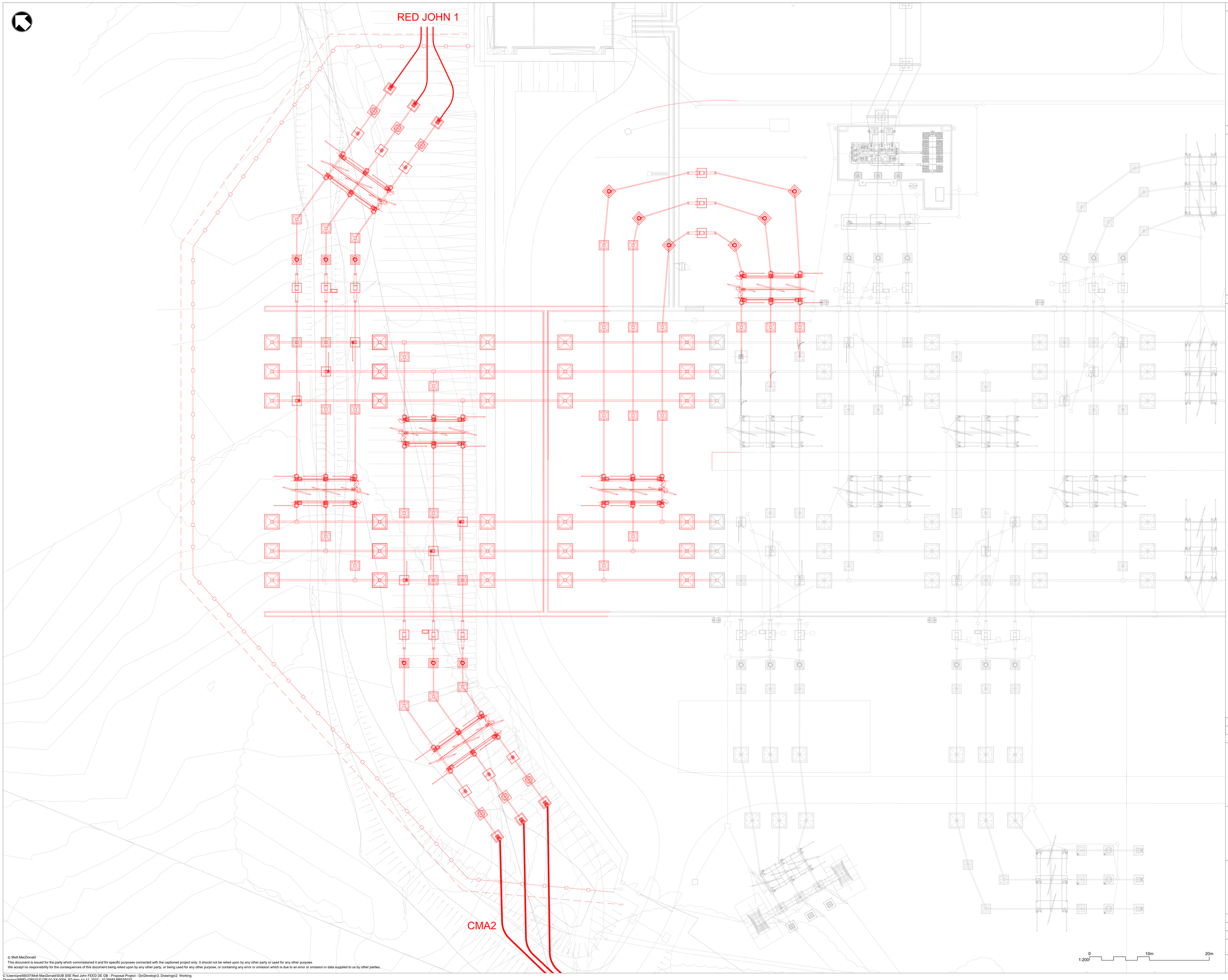

Notes

1. ALL EXISTING INFORMATION BASED ON DRAWING N57_1110_1001_01_05 (KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES).
2. KNOCKANGAEL OPTION DRAWINGS SHOULD BE TREATED AS INDICATIVE ONLY AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES.
3. EQUIPMENT CLEARANCES TO BE VERIFIED DURING DESIGN DEVELOPMENT ONCE NATIVE AS BUILT FILES BECOME AVAILABLE.
4. KNOCKANGAEL SUBSTATION RATING 275kV 4000A 40KA 1s.
5. ALL SURVEY INFORMATION IS REFERENCED TO ORDNANCE SURVEY NATIONAL GRID OSGB36.
6. SUBSTATION COMPOUND TO BE EXTENDED TO ACCOMMODATE NEW BUSBARS AND BUS SECTIONS. CIVIL WORKS WILL BE REQUIRED TO CREATE A LEVEL GROUND AREA FOR THIS EXTENSION.
7. EXTENDED OUTAGE (6-12 MONTHS) REQUIRED ON TOMATIN CMA2 CABLE FOR DURATION OF EXTENSION WORKS

Key to symbols

CT

CVT

SA

CSE

PI (LOW LEVEL)

PI (HIGH LEVEL)

Reference Documents

N57_1110_1001_01_05	KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES.

FOR INFORMATION

Rev	Date	Drawn	Description	Ch'k'd	App'd
P2	08/07/22	S.P.	FOR DISCUSSION	N.F.	H.S.
P1	15/03/22	S.P.	FIRST ISSUE FOR COMMENTS	N.F.	H.S.

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Client

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Title

KNOCKNAGAEL EXTENSION
NORTHWEST OPTION 4 (NW4)
EXTENDED OUTAGE
TOMATIN DIVERSION

Designed	N.Ferguson	N.F.	Eng check	H.Smith	H.S.
Drawn	S.Prentice	S.P.	Coordination		
Dwg check	N.Ferguson	N.F.	Approved	H.Smith	H.S.

Scale at A0	Status	Rev	Security
N.T.S.	PRE	P2	STD

Drawing Number
MMD-106510-E-DR-01-XX-0004

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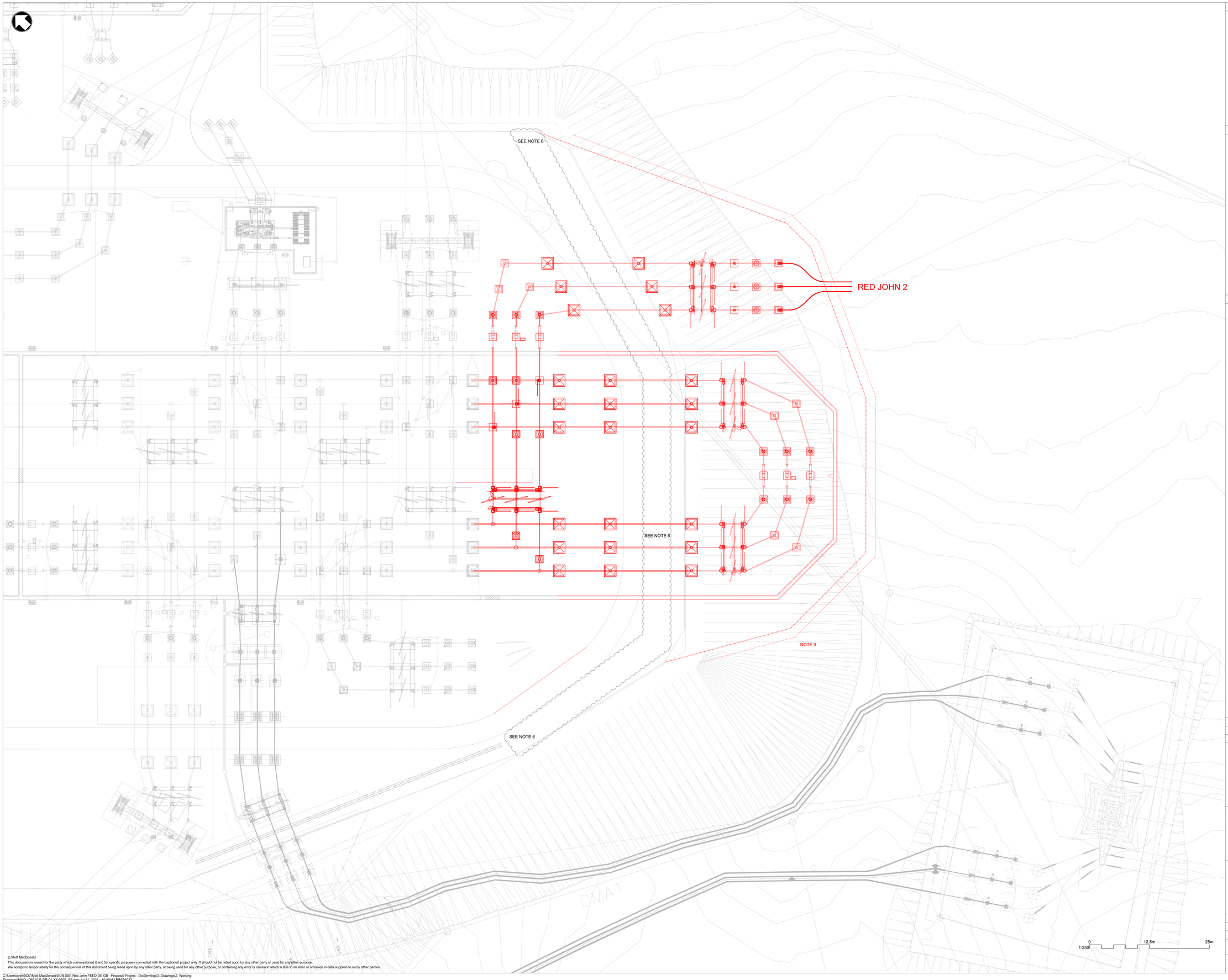
APPENDIX C SE SUBSTATION OPTIONS



Notes

1. ALL EXISTING INFORMATION BASED ON DRAWING N57_1110_1001_01_05 (KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES).
2. KNOCKANGAEL OPTION DRAWINGS SHOULD BE TREATED AS INDICATIVE ONLY AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES.
3. EQUIPMENT CLEARANCES TO BE VERIFIED DURING DESIGN DEVELOPMENT ONCE NATIVE AS BUILT FILES BECOME AVAILABLE.
4. KNOCKANGAEL SUBSTATION RATING 275kV 4000A 40KA 1s.
5. ALL SURVEY INFORMATION IS REFERENCED TO ORDNANCE SURVEY NATIONAL GRID OSGB36.
6. BEAULY CABLES RUN IN VERGE, CABLES TO BE INDICATED ON FINAL DRAWING FOLLOWING GI SURVEY.
7. SUBSTATION COMPOUND TO BE EXTENDED TO ACCOMMODATE NEW BUSBARS AND BUS SECTIONS. CIVIL WORKS WILL BE REQUIRED TO CREATE A LEVEL GROUND AREA FOR THIS EXTENSION.
8. ACCESS ARRANGEMENTS (INCLUDING EXISTING PERIMETER ROAD) TO BE REVIEWED ONCE PREFERRED OPTION IS SELECTED.
9. REQUIREMENT FOR A RETAINING WALL TO BE CONFIRMED BY DETAILED EARTHWORKS MODEL IF OPTION IS PROGRESSED.

Key to symbols

- CT
- CVT
- SA
- CSE
- PI (LOW LEVEL)
- PI (HIGH LEVEL)

Reference Documents

N57_1110_1001_01_05	KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES.

FOR INFORMATION

Rev	Date	Drawn	Description	Ch'k'd	App'd
P2	08/07/22	S.P.	FOR DISCUSSION	N.F.	H.S.
P1	15/03/22	S.P.	FIRST ISSUE FOR COMMENTS	N.F.	H.S.

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Client

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Title

KNOCKNAGAEL EXTENSION
SOUTHEAST OPTION 1 (SE1)
CONVENTIONAL BUS-COUPLER
PARALLEL EXTENSION

Designed	N.Ferguson	N.F.	Eng check	H.Smith	H.S.
Drawn	S.Prentice	S.P.	Coordination		
Dwg check	N.Ferguson	N.F.	Approved	H.Smith	H.S.

Scale at A0	Status	Rev	Security
N.T.S.	PRE	P2	STD

Drawing Number
MMD-106510-E-DR-01-XX-0005

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Notes

1. ALL EXISTING INFORMATION BASED ON DRAWING N57_1110_1001_01_05 (KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES).
2. KNOCKANGAEL OPTION DRAWINGS SHOULD BE TREATED AS INDICATIVE ONLY AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES.
3. EQUIPMENT CLEARANCES TO BE VERIFIED DURING DESIGN DEVELOPMENT ONCE NATIVE AS BUILT FILES BECOME AVAILABLE.
4. KNOCKANGAEL SUBSTATION RATING 275kV 4000A 40KA 1s.
5. ALL SURVEY INFORMATION IS REFERENCED TO ORDNANCE SURVEY NATIONAL GRID OSGB36.
6. BEAULY CABLES RUN IN VERGE, CABLES TO BE INDICATED ON FINAL DRAWING FOLLOWING GI SURVEY.
7. SUBSTATION COMPOUND TO BE EXTENDED TO ACCOMMODATE NEW BUSBARS AND BUS SECTIONS. CIVIL WORKS WILL BE REQUIRED TO CREATE A LEVEL GROUND AREA FOR THIS EXTENSION.
8. ACCESS ARRANGEMENTS (INCLUDING EXISTING PERIMETER ROAD) TO BE REVIEWED ONCE PREFERRED OPTION IS SELECTED.

Key to symbols

- CT
- CVT
- SA
- CSE
- PI (LOW LEVEL)
- PI (HIGH LEVEL)

Reference Documents

N57_1110_1001_01_05	KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES.

FOR INFORMATION

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P2	08/07/22	S.P.	FOR DISCUSSION	N.F.	H.S.
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Client

Scottish & Southern Electricity Networks

Title

KNOCKNAGAEL EXTENSION
SOUTHEAST OPTION 2 (SE2)
CONVENTIONAL BUS-COUPLER
ANGLED EXTENSION

Designed	N.Ferguson	N.F.	Eng check	H.Smith	H.S.
Drawn	S.Prentice	S.P.	Coordination		
Dwg check	N.Ferguson	N.F.	Approved	H.Smith	H.S.

Scale at A0	Status	Rev	Security
N.T.S.	PRE	P2	STD

Drawing Number
MMD-106510-E-DR-01-XX-0006

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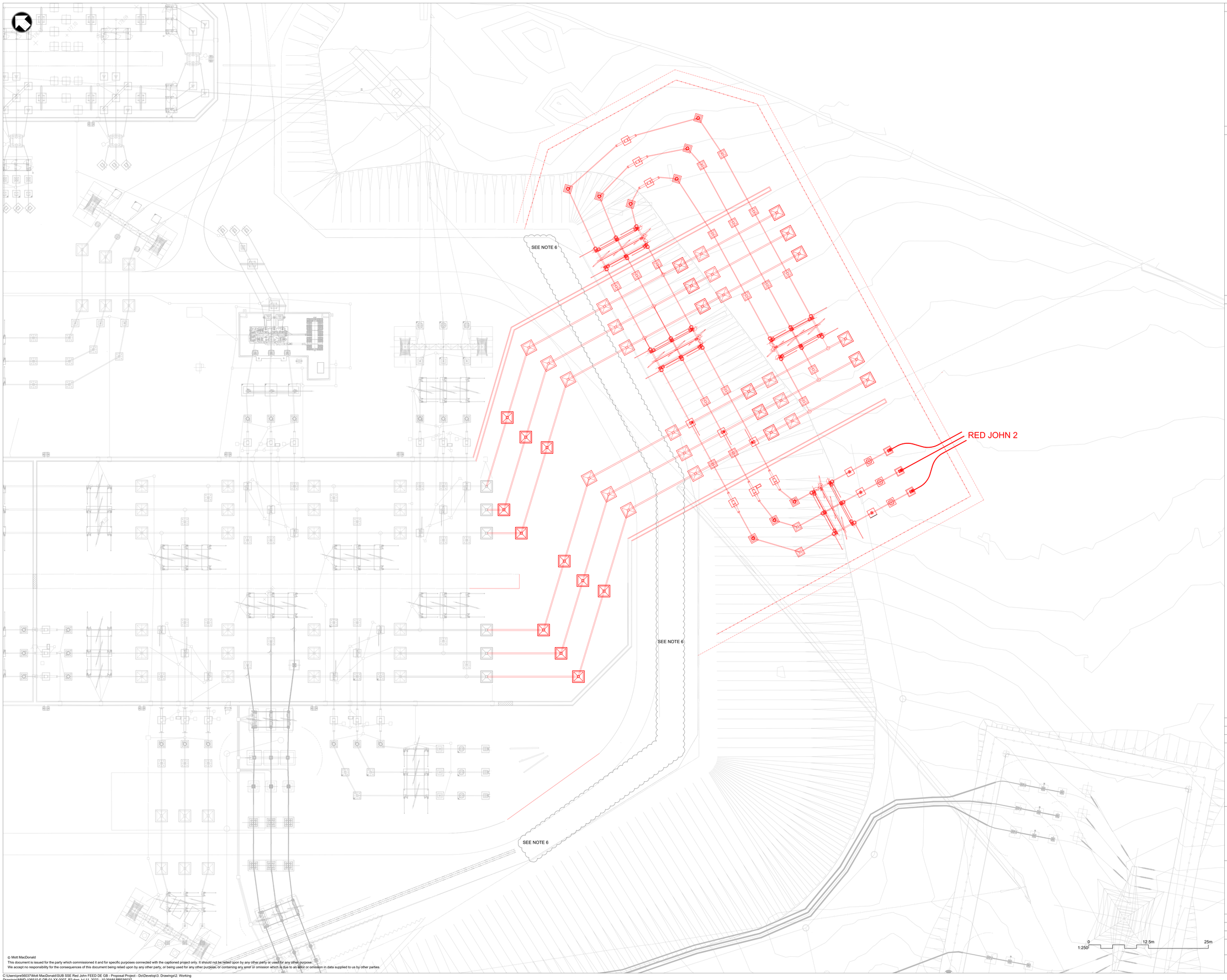

Notes

1. ALL EXISTING INFORMATION BASED ON DRAWING N57_1110_1001_01_05 (KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES).
2. KNOCKANGAEL OPTION DRAWINGS SHOULD BE TREATED AS INDICATIVE ONLY AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES.
3. EQUIPMENT CLEARANCES TO BE VERIFIED DURING DESIGN DEVELOPMENT ONCE NATIVE AS BUILT FILES BECOME AVAILABLE.
4. KNOCKANGAEL SUBSTATION RATING 275kV 4000A 40kA 1S.
5. ALL SURVEY INFORMATION IS REFERENCED TO ORDNANCE SURVEY NATIONAL GRID OSGB36.
6. BEAULY CABLES RUN IN VERGE, CABLES TO BE INDICATED ON FINAL DRAWING FOLLOWING GI SURVEY.
7. SUBSTATION COMPOUND TO BE EXTENDED TO ACCOMMODATE NEW BUSBARS AND BUS SECTIONS. CIVIL WORKS WILL BE REQUIRED TO CREATE A LEVEL GROUND AREA FOR THIS EXTENSION.
8. ACCESS ARRANGEMENTS (INCLUDING EXISTING PERIMETER ROAD) TO BE REVIEWED ONCE PREFERRED OPTION IS SELECTED.

Key to symbols

CT

CVT

SA

CSE

PI (LOW LEVEL)

PI (HIGH LEVEL)

Reference Documents

N57_1110_1001_01_05	KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES.

FOR INFORMATION

Rev	Date	Drawn	Description	Ch'k'd	App'd
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Client

Scottish & Southern Electricity Networks

Title

KNOCKNAGAEL EXTENSION
SOUTHEAST OPTION 3 (SE3)
EXTENDABLE BUS-COUPLER

Designed	N.Ferguson	N.F.	Eng check	H.Smith	H.S.
Drawn	S.Prentice	S.P.	Coordination		
Dwg check	N.Ferguson	N.F.	Approved	H.Smith	H.S.

Scale at A0	Status	Rev	Security
N.T.S.	PRE	P2	STD

Drawing Number

MMD-106510-E-DR-01-XX-0007

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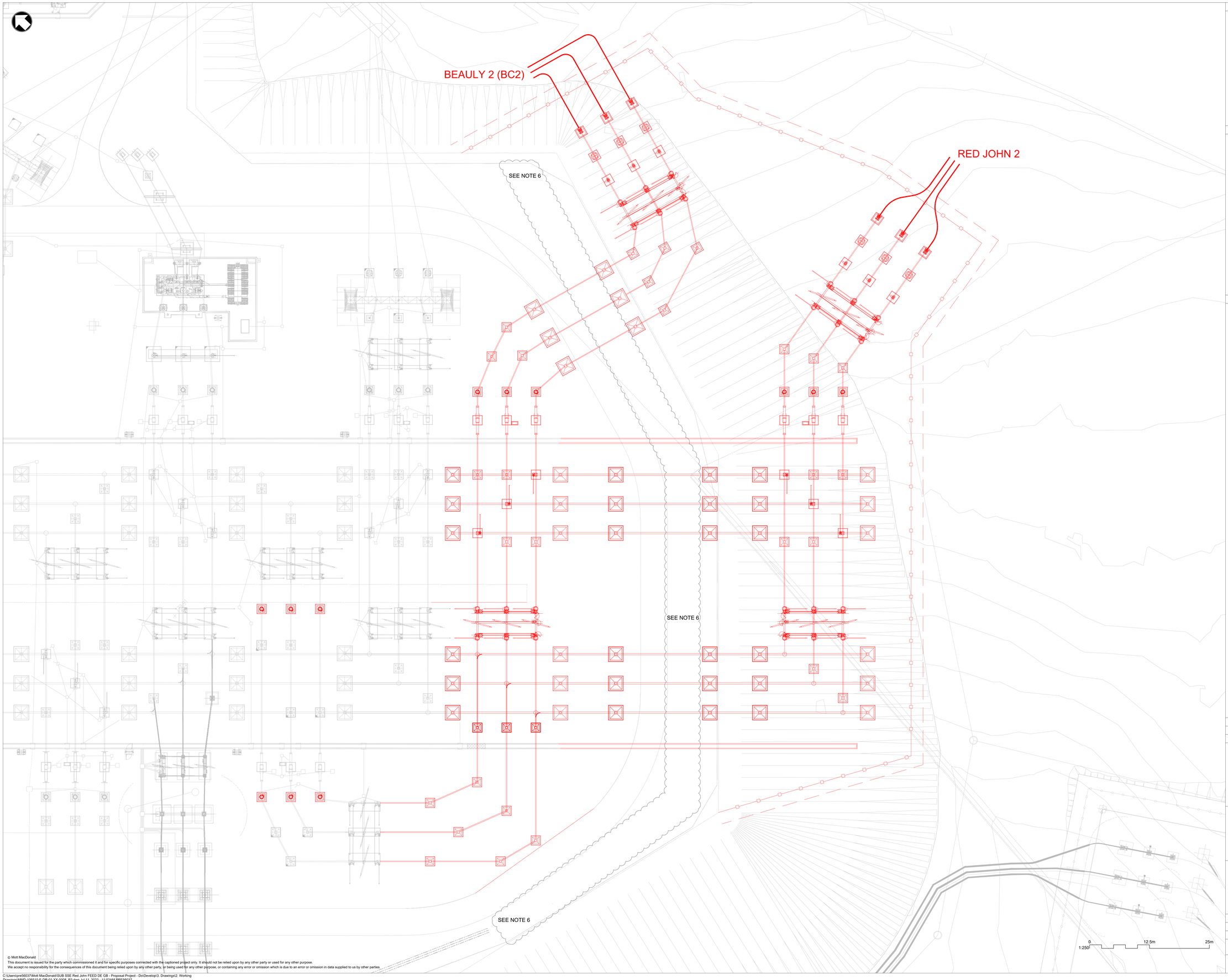

Notes

1. ALL EXISTING INFORMATION BASED ON DRAWING N57_1110_1001_01_05 (KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES).
2. KNOCKANGAEL OPTION DRAWINGS SHOULD BE TREATED AS INDICATIVE ONLY AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES.
3. EQUIPMENT CLEARANCES TO BE VERIFIED DURING DESIGN DEVELOPMENT ONCE NATIVE AS BUILT FILES BECOME AVAILABLE.
4. KNOCKANGAEL SUBSTATION RATING 275kV 4000A 40KA 1s.
5. ALL SURVEY INFORMATION IS REFERENCED TO ORDNANCE SURVEY NATIONAL GRID OSGB36.
6. BEAULY BC2 CABLE CONNECTION RECONNECTED TO NEW BAY.
7. BEAULY CABLES RUN IN VERGE. CABLES TO BE INDICATED ON FINAL DRAWING FOLLOWING GI SURVEY.
8. SUBSTATION COMPOUND TO BE EXTENDED TO ACCOMMODATE NEW BUSBARS AND BUS SECTIONS. CIVIL WORKS WILL BE REQUIRED TO CREATE A LEVEL GROUND AREA FOR THIS EXTENSION.
9. ACCESS ARRANGEMENTS (INCLUDING EXISTING PERIMETER ROAD) TO BE REVIEWED ONCE PREFERRED OPTION IS SELECTED.

Key to symbols

CT

CVT

SA

CSE

PI (LOW LEVEL)

PI (HIGH LEVEL)

Reference Documents

N57_1110_1001_01_05	KNOCKNAGAEL - TOMATIN 132kV & 275kV UNDERGROUND CABLES - CMA1 & CMA2 OVERALL CABLE ROUTES.

FOR INFORMATION

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P1	15/03/22	S.P.	FIRST ISSUE FOR COMMENTS	N.F.	H.S.

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Client

Scottish & Southern Electricity Networks

Title

KNOCKNAGAEL EXTENSION
SOUTHEAST OPTION 4 (SE4)
EXTENDED OUTAGE
BEAULY DIVERSION

Designed	N.Ferguson	N.F.	Eng check	H.Smith	H.S.
Drawn	S.Prentice	S.P.	Coordination		
Dwg check	N.Ferguson	N.F.	Approved	H.Smith	H.S.

Scale at A0	Status	Rev	Security
N.T.S.	PRE	P2	STD

Drawing Number

MMD-106510-E-DR-01-XX-0008

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APPENDIX D SCOTTISH WATER LIST OF PRECAUTIONS FOR ASSETS

Annex 1: Precautions to protect Scottish Water Assets during development activities

General requirements

1. If you are aware the activity is taking place within a drinking water catchment the proposed timing of the works, including planned start and completion dates, should be submitted to Scottish Water 3 months in advance of any activities taking place on-site. This information should be submitted to **protectdwsources@scottishwater.co.uk.**

2. If a connection to the water or waste water network is required, a separate application must be made via the Scottish Water Development Operations Team Portal for permission to connect, this can be found at **Scottishwater/portal**. It is important to note that the granting of planning consent does not guarantee a connection to Scottish Water assets. The Development Operations Team can be contacted by telephone on **0800 389 0379** or via email at **developmentoperations@scottishwater.co.uk**

3. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number **0800 0778 778** and the local contact if known.

Protecting Scottish Water assets

4. If an activity associated with any third party works is located within the vicinity of an existing Scottish Water asset, it is essential that these assets are protected from damage. To this end, the developer will be required to comply with Scottish Water's current process, guidance, standards and policies in relation to such matters.

5. Copies of Scottish Water's relevant record drawings can be obtained from the undernoted Asset Plan Providers. This is distinct from the right to seek access to and inspect apparatus plans at Scottish Waters area offices, for which no charge is applied.

   Site Investigation Services (UK) Ltd
   Tel: 0333 123 1223
   Email: sw@sisplan.co.uk
   www.sisplan.co.uk

   National One-Call
   Tel: 0844 800 9957
   Email: swplans@national-one-call.co.uk
   www.national-one-call.co.uk/swplans

   Cornerstone Projects Ltd
   Tel: 0151 632 5142
   Email: enquiries@cornerstoneprojects.co.uk
   http://www.cornerstoneprojects.co.uk/index.php/scottishwaterplans

6. It should be noted that the site plans obtained via the Asset Plan providers are indicative and their accuracy cannot be relied upon.

7. It is recommended for EIA's, housing and mixed developments that the developer contacts the **Scottish Water Development Enablement Team via the Development Services portal at https://swastroprodweb.azurewebsites.net/home/default** for further advice if assets are shown to be located in the vicinity of the proposed development, and where the exact location and the nature of the infrastructure shown could be a key consideration for the proposed development. An appropriate site investigation may be required to confirm the actual position of assets in the ground. Scottish Water will not be liable for any loss, damage or costs caused by relying upon plans or from carrying out any such site investigation.

8. Proposals for Forestry, Hydro Projects, Mining/Quarries, Peatland Restoration and Utility Projects should be sent to the HAUC Diversions Team via **the Development Services portal at https://swastroprodweb.azurewebsites.net/home/default** for further advice if assets are shown to be located in the vicinity of the proposed development, and where the exact location and the nature of the infrastructure shown could be a key consideration for the proposed development. An appropriate site investigation may be required to confirm the actual position of assets in the ground. Prior to any activity commencing, all known Scottish Water assets should be identified, located and marked-out. Please note that Scottish Water records are indicative only and it is your responsibility to accurately locate the position and depth of these pipes on site before preparing and submitting your plans. No intrusive site investigation works (e.g. trial holes) should be undertaken without written permission from Scottish Water.

9. Scottish Water requires Risk Assessment Method Statements (RAMS) and Safe Systems of Work (SSoW) to be prepared and submitted in advance to Scottish Water for formal review and acceptance. These documents shall consider and outline in detail how existing Scottish Water assets are to be protected and/or managed for the duration of any construction works and during operation of the development if relevant. These documents must be submitted to Scottish Water for formal prior written acceptance.

10. The developer shall obtain written acceptance from Scottish Water where any site activities are intended to take place in the vicinity of Scottish Water's assets. The relevant team can advise on any potential risk mitigation measures that may be required.

11. Scottish Water and its representatives shall be allowed access to Scottish Water assets at all times for inspection, maintenance and repair. This will also ensure that the Scottish Water assets are protected and that any Scottish Water requirements are being observed.

12. Any obstruction or hindrance of access to Scottish Water assets should be avoided. The prompt and efficient use and manipulation of valves, hydrants, meters or other apparatus is required at all times. There should also be no interference with the free discharge from water main scours or sewer overflows.

13. In the event of an incident occurring that could affect Scottish Water, including any damage to assets, Scottish Water should be notified without delay, using the Customer Helpline number **0800 0778 778**, and the local contact if known. Scottish Water apparatus should not be interfered with or operated by anyone other than Scottish Water personnel.

14. Minimum Distances of Sewers/Water Mains from Buildings/Structures/other Obstructions – There are two critical issues relating to how close you can build to water mains and sewers.

    1. Scottish Water has a legal right of access in order to maintain and repair assets and there are minimum distances required in order to facilitate future SW access to water mains and sewers. No buildings, structures or any other obstructions that will restrict our access or put at risk the integrity of the assets is permitted within this distance.

    2. For pressurised pipes there is a recommended distance to be used in order to protect adjacent buildings and structures should the asset burst. This is the recommended distance to minimise the risk of damage to adjacent properties and structures in the event of a water main failure. It is suggested that this distance may include garden areas but should not include inhabited structures.

    The details of these requirements should be confirmed with Scottish Water as an early part of the design process.

15. Stationary plant, equipment, scaffolding, construction or excavated material, etc. should not be placed over, or close to, any Scottish Water assets without the prior written consent of Scottish Water which may be withheld depending on circumstances on-site.

16. Special care should be taken to avoid the burying of Scottish Water assets or the obstruction of sewers or manholes with fill or other material. Arrangements for altering the level of any chambers should be agreed in advance with Scottish Water and these should be constructed in accordance with Scottish Water requirements. The cost of any work to Scottish Water assets will be met by the project developer.

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18. Any tree planting associated with the development (e.g. compensatory planting or screening etc.) should be undertaken in line with Water for Scotland 4th Edition 2018 and Sewers for Scotland 4th Edition 2018 to ensure that Scottish Water's assets are not put at risk by future growth of tree roots.

19. Vibration in close proximity to Scottish Water pipelines or ancillary apparatus should be managed in accordance with British Standard 5228-1:2009 (Code of practice for noise and vibration control on construction and open sites). The predicted levels of vibration should be agreed in advance with Scottish Water as part of the risk assessment and method statement and agreed vibration monitoring arrangements will be required.

20. The developer will consider the possibility of increased loading on Scottish Water apparatus and measures will be taken to eliminate or mitigate increased loading on assets. Care should be taken to identify the exact location (line and level) of any assets, which may be crossed by vehicles on the access route to the site and crossing points will be engineered to the requirements of Scottish Water. Any pipe crossing proposals are subject to prior written acceptance by Scottish Water.

21. Scottish Water will not accept liability for any costs incurred in fulfilling any of the above requirements during the development planning, construction or operational phases, either by the developer, the developer's associates, contractors or any other person or organisation involved in the project.

22. If the developer damages any Scottish Water asset they will be held liable for any costs resulting from this.

23. Scottish Water may require costs associated with the development to be reimbursed by the developer or the developer's agents.

APPENDIX E SCOTTISH WATER LIST OF PRECAUTIONS FOR DRINKING WATER AND ASSETS GENERAL

Annex 1: Precautions to protect drinking water and Scottish Water assets during development activities

General requirements

1. If you are aware the activity is taking place within a drinking water catchment the proposed timing of the works, including planned start and completion dates, should be submitted to Scottish Water 3 months in advance of any activities taking place on-site. This information should be submitted to **protectdwsources@scottishwater.co.uk.**

2. If a connection to the water or waste water network is required, a separate application must be made via the Scottish Water Development Operations Team Portal for permission to connect, this can be found at **Scottishwater/portal**. It is important to note that the granting of planning consent does not guarantee a connection to Scottish Water assets. The Development Operations Team can be contacted by telephone on **0800 389 0379** or via email at **developmentoperations@scottishwater.co.uk**.

3. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number **0800 0778 778** and the local contact if known.

Protecting drinking water quality

Regulatory requirements

4. Scottish Water is required to ensure that any activity within a drinking water catchment does not affect the ability of Scottish Water to meet its regulatory requirements.

5. Water Treatment Works are designed to treat the specific parameters of the raw water source they receive (i.e. the specific chemical, biological and other characteristics of natural, untreated water). If the characteristics of the raw water change or deteriorate, it can affect the ability of the works to supply drinking water to customers at the required standards.

6. The regulations relating to the quality of drinking water supplied by Scottish Water are the Public Water Supplies (Scotland) Regulations 2014 as amended. Quality Standards are derived from the European Drinking Water Directive 98/83/EC.

7. Drinking water catchments feed Scottish Water abstractions which supply water to water treatment works. Under Article 7 of the Water Framework Directive, waters used for the abstraction of drinking water are designated as Drinking Water Protected Areas (DWPA). The objective of the Water Framework Directive is to ensure that no activity results in the deterioration of waters within the DWPA. If an activity falls within a DWPA or drinking water catchment, it is essential that water quality and quantity are protected

Specific precautions for drinking water protection

8. A detailed, site specific Construction Method Statement including e.g. Construction Environmental Management Plan, Risk Assessment Method Statement, Pollution Prevention and Incident Plan and Contingency Plan must be submitted to Scottish Water at least 3 months prior to the works commencing. This should be agreed with Scottish Water prior to any operations taking place. Any other associated documents (e.g. Drainage Plan, Peat Management Plan etc.) should also be submitted and agreed with Scottish Water at least 3 months prior to works commencing. In the first instance, this information should be supplied to **protectdwsources@scottishwater.co.uk.**

9. If helicopters are being used to transport equipment, machinery or infrastructure you must detail this within your documentation as detailed above. We would request that no refuelling takes place within the catchment where possible. If not possible, please provide as large a buffer as you can from the watercourse and certainly no less than the 50m, locate equipment on a level area sloping away from the watercourse and have spill kits available. Flying directly over the source should be avoided, where possible.

10. Where possible, infrastructure and activities should be located outside of the drinking water catchment. If this can be demonstrated to be impracticable then all infrastructure and activities should be located 100m from any watercourse where possible, and a minimum of 50m, where 100m can be demonstrated to be undeliverable.

11. Any potential effect on the hydrology of the area resulting from the construction and operation of the proposed development should be assessed and the findings presented in the Environmental Statement or environmental appraisal accompanying the planning application. This should include consideration of natural drainage patterns, base flows/volume, retention/run-off rates and potential changes to water quantity. Any required mitigation measures and proposed monitoring should also be detailed in the Environmental Statement or environmental appraisal accompanying the planning application.

12. When constructing roads, drainage ditches and trenches, drainage should not be directed into adjacent catchments but retained within the existing catchment.

13. Restoration or reseeding of access routes should be considered as routes can become degraded as work progresses.

14. Bog Mats or Ground Guards are recommended for use as ground protection solutions for creating long term temporary access roads and trackways onto sites, limiting the impact on the environment as they limit surface degradation.

15. Any potential pollution risk which could affect water quality should be considered and mitigation measures implemented to prevent deterioration in water quality and pollution incidents. This includes sediment run-off, soil or peat erosion, management of chemicals, fuels and oils, etc. (see also point 20 below). This should be considered for operations at all stages of development including pre- and post-construction.

16. Mitigation measures to prevent pollution to watercourses should be outlined in the Environmental Statement or environmental appraisal accompanying the planning application, and adopted in the Construction Method Statement/Construction Environmental Management Plan prior to work starting onsite. Any mitigation measures implemented should be checked regularly, maintained and improved to prevent deterioration in water quality and pollution incidents.

17. Sustainable drainage (SUDs) options should be considered, such as settlement ponds and designated filtration areas.

18. Watercourses that feed into any watercourses or reservoirs that Scottish Water abstracts from should be considered when developing new road or access infrastructure. Any crossing of these watercourses should be kept to a minimum. Pollution prevention measures should be put in place at each crossing point and silt traps, or equivalent, should be installed at regular intervals to minimise the risk from pollution.

19. Once constructed, site roads and access routes should be regularly maintained to ensure minimal erosion, and hence run-off and pollution, from the road surface. Avoid using material resulting in metallic, sulphide-rich or strongly acidic polluted water run-off, ideally using inert materials with low erodibility

20. No refuelling or storage of fuel or hazardous materials should take place within the drinking water catchment area. If this can be demonstrated to be impracticable, then the appropriate Pollution Prevention Guidelines (PPGs) or updated Guidance for Pollution Prevention (GPPs) should be followed. This includes, GPP 2: Above ground oil storage tanks, GPP 5 Works and maintenance in or near water, PPG 6: Working and Construction and Demolition Sites, GPP 8: Safe storage and disposal of used oils, GPP 21: Pollution incident response planning and PPG 22: Incident response – dealing with spills. Rather than 10m buffers from watercourses, we would recommend 50m buffers are applied to watercourses and 50m applied to spring, well or borehole. Oil storage should be in accordance with The Water Environment (Oil Storage) Regulations (Scotland) 2006. There should be dedicated oil storage areas created. Spill kits should be located within all vehicles, plant and high risk areas, as well as the consideration and use of nappies and booms.

21. Waste storage, concrete preparation and all washout areas should not be within the drinking water catchment area. If this can be demonstrated to be impracticable then this should be in dedicated areas 50m from a watercourse and designed to be contained and to prevent escape of materials/run-off to the environment. Any waste must be removed safely from site for the required treatment and disposal.

22. Welfare/waste water facilities should preferably be located outside the drinking water catchment. If not practicable, then portable toilets should be used and waste disposed of off-site. Alternatively secondary treatment and soakaways should be used and, if required, a sampling chamber installed and sampling programme agreed. The proposed method of managing welfare and waste water facilities should be detailed in the Environmental Statement or environmental appraisal accompanying the planning application. If sampling is required, Scottish Water should be contacted via **PlanningConsultations@scottishwater.co.uk** in the first instance.

23. Any proposed abstractions for activities such as welfare facilities or cement batching plants should be detailed in the Environmental Statement or environmental appraisal accompanying the planning application.

24. Induction training should be given to all personnel on-site and should include Scottish Water site sensitivities in relation to drinking water catchments and assets (see below), as well as spill response as outlined in PPG 22: Dealing with spills.

25. Construction and Environmental Management Plans, Pollution Prevention and Incident Plans, Risk Assessment Method Statements and Contingency Plans and other associated documents should include the Scottish Water Customer Helpline Number **0800 0778 778** and the local contact details.

Protecting drinking water in peatland areas

26. When peat is present within the proposed area of activity the Environmental Statement or environmental appraisal accompanying the planning application should include an assessment on the potential release of colour and dissolved organic carbon quality as a result of changes to hydrology and/or physical disturbance. This should cover the construction and post construction phases.

27. Excavations and ground disturbance in areas of deep peat should be avoided. Deep peat is considered to be peat greater than 0.5m deep.

28. The natural hydrology within peat should be maintained and/or restored. Any necessary measures to maintain natural drainage of peat and sub-surface hydrology, such as tailored drain spacing on access tracks, should be implemented as part of the design of the development.

29. Scottish Water requests that, where possible, access tracks in the drinking water catchment are constructed as floating tracks with adequate provision for maintaining existing drainage patterns.

30. Exposed soils and peat can release sediment, colour and dissolved organic carbon. The use of geotextiles, turf replacement and/or reseeding, should be undertaken as soon as possible.

31. Restoration of any degraded peat should be considered for areas within the drinking water catchment.

32. Turves should be carefully removed and stored vegetative side up so they can be placed back over any excavated soils to ensure the soils surface stabilises and recovers as quickly as possible

Protecting drinking water due to forestry activity

33. An assessment of any forestry activity, including felling, planting or other activities, likely to affect the drinking water catchment should be included in the Environmental Statement or environmental appraisal accompanying the planning application. Any specific mitigation measures should be identified and incorporated into the Construction Environmental Management Plan for the site, prior to any work commencing on site.

34. The Environmental Statement or environmental appraisal accompanying the planning application should include details on the harvesting/clearance process for any felling/woodland removal. The least disturbing method/s should be selected where possible.

35. Any historic drains and ditches within the site boundary that discharge directly to a watercourse in the drinking water catchment, these should be blocked and slowly discharged to a buffer area in line with current Forestry and Water Scotland Know the Rules booklet. Where possible, this should be undertaken in advance of any work being carried out on site, to provide protection for watercourses during site activities.

Monitoring requirements to protect drinking water quality

36. Depending on the vulnerability of the public water supply, Scottish Water may request that a water sampling programme is to be undertaken and for the sampling parameters to be agreed with Scottish Water. This should assess the baseline water quality for a minimum of one year prior to any activities commencing on-site where possible, including ground investigations and any other activities, to allow an accurate understanding of baseline conditions at the site. Water sampling should continue during construction and then post-construction for a minimum of one year. Following completion of one year of sampling post-construction, this should be reviewed to determine whether this should continue for a further agreed period. The parameters, frequency and sampling locations will also need to be agreed with Scottish Water. This monitoring will establish if any decline in water quality can be attributed to the development. It may also be necessary to establish trigger levels to determine when any potential issues should be reported to Scottish Water.

37. During activities, a programme of daily visual inspection of the watercourses, flow conditions (i.e. high, medium, low, or no flow), prevailing weather and any other pertinent observations, will be required to be implemented. The results should be recorded and the information submitted to Scottish Water (i.e. in a monthly progress report). This should be undertaken when water quality samples are taken if sampling has been agreed as necessary. Proposals for monitoring should be submitted to **protectdwsources@scottishwater.co.uk.**

38. The appointed Contractor/Site Foreman or Ecological or Environmental Clerk of Works should have relevant knowledge and experience to provide advice and monitor compliance with measures for the protection of water quality in relation to abstractions for water supply.

39. Depending on the vulnerability of the public water supply, Scottish Water may request that a dedicated Environmental Manager be appointed and present on-site to assess and monitor any effects caused by the development.

Guidance documents

40. Please ensure that appropriate Guidance Documents are followed:

- Floating Roads on Peat. Forestry Civil Engineering and SNH. (August 2010).
- Constructed tracks in the Scottish Uplands, 2nd edition. SNH (June 2013).
- The UK Forestry Standard – The Governments approach to Sustainable Forestry 2017
- Forestry and Water Scotland (http://www.confor.org.uk/resources/forestry-water-scotland/guidance-documents/)
- General Binding Rules under the Controlled Activities Regulations (see The Water Environment (Controlled Activities) Scotland Regulations 2011 (as amended) A Practical Guide, Version 8.3 February 2019
- SEPA Pollution Prevention Guidance (http://www.sepa.org.uk/regulations/water/guidance/).
- CREW Rural Sustainable Drainage Systems (visit https://www.crew.ac.uk/sites/www.crew.ac.uk/files/sites/default/files/publication/Rural%20SuDS%20Design%20and%20Build%20Guide%20December%202016.pdf)

Protecting Scottish Water assets

41. If an activity associated with a development proposal is located within close proximity to Scottish Water assets, including water and waste water pipe infrastructure, treatment works and reservoirs etc., it is essential that these assets are protected from damage. To this end, the developer will be required to comply with Scottish Water's current process, guidance, standards and policies in relation to such matters.

42. Copies of Scottish Water's relevant record drawings can be obtained from the undernoted Asset Plan Providers. This is distinct from the right to seek access to and inspect apparatus plans at Scottish Waters area offices, for which no charge is applied.

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43. It should be noted that the site plans obtained via the Asset Plan providers are indicative and their accuracy cannot be relied upon.

44. It is recommended for EIA's, housing and mixed developments that the developer contacts the **Scottish Water Development Enablement Team via the Development Services portal at https://swastroprodweb.azurewebsites.net/home/default** for further advice if assets are shown to be located in the vicinity of the proposed development, and where the exact location and the nature of the infrastructure shown could be a key consideration for the proposed development. An appropriate site investigation may be required to confirm the actual position of assets in the ground. Scottish Water will not be liable for any loss, damage or costs caused by relying upon plans or from carrying out any such site investigation.

45. Proposals for Forestry, Hydro Projects, Mining/Quarries and Peatland Restoration should be sent to the HAUC Diversions Team via **the Development Services portal at https://swastroprodweb.azurewebsites.net/home/default** for further advice if assets are shown to be located in the vicinity of the proposed development, and where the exact location and the nature of the infrastructure shown could be a key consideration for the proposed development. An appropriate site investigation may be required to confirm the actual position of assets in the ground. Scottish Water will not be liable for any loss, damage or costs caused by relying upon plans or from carrying out any such site investigation.

46. Prior to any activity commencing, all known Scottish Water assets should be identified, located and marked-out.

47. Scottish Water expects Risk Assessment Method Statements (RAMS) and Safe Systems of Work (SSoW) to be prepared and submitted in advance to Scottish Water for formal review and acceptance. These documents shall consider and outline in detail how existing Scottish Water assets are to be protected and/or managed for the duration of any construction works and during operation of the development if relevant. These documents must be submitted to Scottish Water as detailed above, for formal written acceptance prior to any work commencing onsite.

48. The developer shall obtain written acceptance from Scottish Water where any site activities are intended to take place in the vicinity of Scottish Water's assets. The relevant team as detailed above, can advise on any potential risk mitigation measures that may be required.

49. Scottish Water and its representatives shall be allowed access to Scottish Water assets at all times for inspection, maintenance and repair. This will also ensure that the Scottish Water assets are protected and that any Scottish Water requirements are being observed.

50. Any obstruction or hindrance of access to Scottish Water assets should be avoided. The prompt and efficient use and manipulation of valves, hydrants, meters or other apparatus is required at all times. There should also be no interference with the free discharge from water main scours or sewer overflows.

51. In the event of an incident occurring that could affect Scottish Water, including any damage to assets, Scottish Water should be notified without delay, using the Customer Helpline number **0800 0778 778**, and the local contact if known. Scottish Water apparatus should not be interfered with or operated by anyone other than Scottish Water personnel.

52. The 'offset distance' is the distance between any Scottish Water asset and adjacent properties and structures. Scottish Water reserves the right to ask for an offset distance in accordance with its own current policy and standards and to suit specific circumstances. The details of this requirement should be confirmed with Scottish Water as an early part of the design process.

53. Stationary plant, equipment, scaffolding, construction or excavated material, etc. should not be placed over, or close to, any Scottish Water assets without the prior written consent of Scottish Water which may be withheld depending on circumstances on-site.

54. Special care should be taken to avoid the burying of Scottish Water assets or the obstruction of sewers or manholes with fill or other material. Arrangements for altering the level of any chambers should be agreed in advance with Scottish Water and these should be constructed in accordance with Scottish Water requirements. The cost of any work to Scottish Water assets will be met by the project developer.

55. Excavation works (e.g. of wind turbine foundations) should not be carried out in the proximity of a water or waste water main without due notice having been given to Scottish Water and prior written acceptance obtained. The developer will comply fully with any Scottish Water specific site requirements.

56. Any tree planting associated with the development (e.g. compensatory planting or screening etc.) should be undertaken in line with Water for Scotland 4th Edition 2019 to ensure that Scottish Water assets are not put at risk by future growth of tree roots.

57. Vibration in close proximity to Scottish Water pipelines or ancillary apparatus should be managed in accordance with British Standard 5228-1:2009 (Code of practice for noise and vibration control on construction and open sites). The predicted levels of vibration should be agreed in advance with Scottish Water as part of the Risk Assessment Method Statement (RAMS) and agreed vibration monitoring arrangements will be required.

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59. Scottish Water will not accept liability for any costs incurred in fulfilling any of the above requirements during the development planning, construction or operational phases, either by the developer, the developer's associates, and contractors or any other person or organisation involved in the project.

60. If the developer damages any Scottish Water asset they will be held liable for any costs resulting from this. Scottish Water may require costs associated with the development to be reimbursed by the developer or the developer's agents. Protecting Scottish Water assets

61. If an activity associated with any third party works is located within the vicinity of an existing Scottish Water asset, it is essential that these assets are protected from damage. To this end, the developer will be required to comply with Scottish Water's current process, guidance, standards and policies in relation to such matters.

62. Copies of Scottish Water's relevant record drawings can be obtained from the undernoted Asset Plan Providers. This is distinct from the right to seek access to and inspect apparatus plans at Scottish Waters area offices, for which no charge is applied.

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buildings, structures or any other obstructions that will restrict our access or put at risk the integrity of the assets is permitted within this distance.

2. For pressurised pipes there is a recommended distance to be used in order to protect adjacent buildings and structures should the asset burst. This is the recommended distance to minimise the risk of damage to adjacent properties and structures in the event of a water main failure. It is suggested that this distance may include garden areas but should not include inhabited structures.

The details of these requirements should be confirmed with Scottish Water as an early part of the design process.

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APPENDIX F ROUTEING CONSULTATION RESPONSES

Topic	Comment received	SSEN Transmission Response
Ornithology	NatureScot stated that the preferred route B runs adjacent to Loch Ashie Special Protection Area, classified for Slavonian Grebe, Passage. Loch Ashie SPA regularly supports a population of European importance of the species. With an autumn gathering of (up to 60 individuals, up to 15% of the GB population). This is the most important known moult site in Scotland. They advise that an application going forward needs to consider what impact the work will have on the site with particular focus on disturbance of birds during the moult in the autumn. They welcome the proposal to underground the cable as this will limit impacts on birds arriving and leaving the loch before and after the moult. NatureScot did not have any comments to make on the proposed substation extension.	During the alignment and Environmental Assessment stage, SSEN Transmission will assess the potential impact of the route on SPA qualifying species. Habitat Regulations Appraisal will be undertaken.
	RSPB Scotland stated that although the preferred route is in close proximity to the Loch Ashie SPA, careful consideration of timing of works should prevent impacts on moulting and breeding Slavonian grebe. They noted that it is proposed that work would start from November with work closest to the Loch being completed by the end of March. However, if work is likely to continue into the breeding season, then bird surveys will be required to inform timing of works and prevent disturbance and/or nest destruction. It was also stated on page 3 of the Consultation Document that '*Vantage point surveys are being undertaken in 2021/22 to understand the interaction between birds and potential overhead lines along the routes*.' However, RSPB Scotland felt it was unclear how/when this information will be incorporated into the decision making and consultation process and the current proposal relates to underground cable connection. RSPB Scotland welcome the aim to secure biodiversity net gain, but they have some concerns about the approach used and provide comments that might help refine this approach for other projects. The BNG Appraisal says to refer to the BNG report for further detail, but this does not seem to be available. RSPB Scotland stated that the data sources used to identify potential environmental constraints do not include any priority habitats away from designated sites and do not include searches for RSPB or Highland raptor study group data. It is therefore difficult to understand what the RAG rating for ornithology is based on and how much it differs from the 'designations' rating. In previous consultations on route appraisals, data from a data request to RSPB and Highland Raptor Study Group has been included to inform	During the alignment stage, SSEN Transmission will assess the potential impact of the route on SPA qualifying species. SSEN also acknowledge that if construction is to continue into the breeding bird season, then bird surveys will be required to inform timing of works and prevent disturbance and/or nest destruction. Vantage point surveys were mentioned in error and are not currently being undertaken. BNG assessment and reporting has been undertaken for the routeing and site selection stage. This will be refined and updated through the next stage of site and alignment selection. This will be assessed based on site survey. A data request to RSPB and the Highland raptor study group will be completed at the next stage of site and alignment selection.

Topic	Comment received	SSEN Transmission Response
	assessments. RSPB Scotland therefore noted it would be useful to know why this does not seem to have been done in this case. RSPB Scotland stated that for Route B, the preferred route, (and routes A and C) there would be a predicted impact on Annex 1 habitat H91C0 Caledonian forest and ancient woodland sites. However, as the Caledonian forest has not been mapped there is no indication as to how much will be impacted and whether impacts could be avoided with micro-siting. It is also unclear if impacts on ancient woodland and Caledonian forest are included in the 'habitats' or 'forestry' RAG rating. Impacts on ancient woodland have not been included in the 'pros and cons' tables in the booklet. The report states: '*Biodiversity Units in underground cabling sections are presented as temporary loss, based on the assumption that the habitat will be restored once the cable has been laid*.' However, impacts on Caledonian forest cannot be mitigated, and it is assumed that this would make up part of the 1,284.45 'units' of irreplaceable habitats. RSPB Scotland hope that further detail on how and where biodiversity net gain will be delivered for this project will be provided at the next stage once the preferred route option is decided upon. RSPB Scotland had no comments on the preferred location for the site extension of the Knocknagael substation.	Caledonian forest will be fully considered at the alignment stage.
Woodland	A public comment at the public exhibition event noted the presence of native trees to the west of the unclassified public road (U1096) to the west of the existing Knocknagael substation in the vicinity of Ordnance Survey (OS) mapped 'wells'. The member of the public asked for the final alignment to consider avoidance of the need to fell the trees.	SSEN Transmission will seek an alignment that avoids trees wherever practicable.
Fisheries	Ness District Salmon Fishery Board agreed that the preferred option (Route B) is the most appropriate. Their interests in the area are mainly focussed on hydrology and Route B appears to have the least potential impact on the hydrology of the area and avoids the main catchments (primarily the upper reaches of the Holm Burn/Big Burn). This watercourse is already heavily impacted by abstraction and historic straightening. Ness District Salmon Fishery Board noted that if any data on fish populations within the proposed route is required, or there is a need for any fish surveys in connection with the cable route, they may be able to assist.	If any data on fish populations within the proposed route is required, or there is a need for any fish surveys in connection with the cable route SSEN Transmission will consult further Ness District Salmon Fishery Board.

Topic	Comment received	SSEN Transmission Response
Hydrology and Geology	<u>Drinking Water Protected Areas</u> Scottish Water noted there are no drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area where the substation is to be located. However, the cable route options do fall within drinking water catchments where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. Loch Ness supplies Invermoriston Water Treatment Works (WTW), Loch Ashie and Loch Duntelchaig supply Inverness Loch Ashie (WTW) and Loch and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water, they should be notified without delay using the Customer Helpline number 0800 0778 778. This presents a high risk to water quality and therefore Scottish Water would request further involvement at more detailed design stages to determine the most appropriate proposals and mitigation within the catchment to protect water quality and quantity. The fact that this area is located within a drinking water catchment should be noted in future documentation. Also anyone working on site should be made aware of this during site inductions. Further information should be sent to the Sustainable Land Management team by contacting us via protectdwsources@scottishwater.co.uk	During future stages of the project, SSEN Transmission will consult further with Scottish Water to identify the most appropriate mitigation to protect water quality.
	<u>Scottish Water Assets</u> There are no assets that appear to be affected by the proposed substation location. However, there are a large number of Scottish Water assets potentially affected by the cable route. This should be confirmed through obtaining plans from Scottish Water Asset Plan Providers. Details of their Asset Plan Providers are included in the Scottish Water list of precautions for assets, which can be found on the activities within their catchments page of their website at www.scottishwater.co.uk/slm. All Scottish Water assets potentially affected by the activity should be identified, with particular consideration being given to access roads and pipe crossings. If necessary, local Scottish Water personnel may be able to visit the site to offer advice. All of Scottish Water's processes, standards and policies in relation to dealing with asset conflicts must be complied with.	SSEN Transmission will review the Scottish Water Asset Plans and confirm any that would be potentially affected by the route. Contact would then be made with HAUC Diversions Team as required. Scottish Water provided copies of its list of precautions for which the Proposed Development will require to adhere to. These are included in Appendices A and B.

Topic	Comment received	SSEN Transmission Response
	In the event that asset conflicts are identified then early contact should be made with HAUC Diversions Team via the Development Services portal - https://swastroprodweb.azurewebsites.net/home/default. All detailed design proposals relating to the protection of Scottish Water's assets should be submitted to the HAUC for review and written acceptance. Works should not take place on site without prior written acceptance by Scottish Water. Scottish Water have produced a list of precautions for a range of activities. The list of precautions for assets details protection measures to be taken if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. The document/s and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm. It should be noted that the proposals will be required to comply with Sewers for Scotland and Water for Scotland 4th Editions 2018, including provision of appropriate clearance distances from Scottish Water assets.	
Access, Traffic and Transport	Transport Scotland noted that the three route options and five site options are located south of Inverness and northeast of Loch Ness, with the nearest connection to the A82(T) being approximately 6.3km to the north. Consequently, as the options will not impact on the trunk road network, Transport Scotland had no opinion to offer on either the route options or the substation site options. It should be noted, however, that Transport Scotland will require to be consulted on any subsequent application for the proposed Connection, with any potential transport related impacts being assessed and mitigated. In the absence of any further information, Transport Scotland has no further comment to make at this stage. They did however request a Transport Statement be submitted with any future application. All future consultations for Transport Scotland regarding this scheme etc. should be sent to TS Development Management: development_management@transport.gov.scot	A Transport Statement will be submitted with any future application.

Topic	Comment received	SSEN Transmission Response
	Dores and Essich Community Council would not support Route A as it is felt this is most likely affect properties along the route. Route B is preferred, subject to further assessment. Impact on traffic and road safety will be a key issue for Dores and Essich Community Council. There is also view within the community that the road safety improvements that were agreed when the original substation was consented, in particular on the Essich Road, have never been fully implemented. This should therefore be reviewed in the development of this project. It was also noted at the public exhibition event that Dores and Essich Community Council would welcome a local presentation of the next iteration of the scheme design so that the broader community may have the opportunity to comment.	A Transport Statement or similar will be produced to set out proposed traffic and transport details of the Proposed Development. SSEN Transmission will consult with Dores and Essich Community Council to organise a suitable opportunity to present the next iteration of the scheme design.
	A feedback form noted concern on the potential impact to access for walkers e.g. South Loch Ness Trail as well as road access for local and tourists.	Access and recreational resources including local walking paths and core paths, will be considered during the next stage of alignment and site selection.
Cultural Heritage	Historic Environment Scotland identified no significant concerns. However, Historic Environment Scotland highlighted that even though UGC is Permitted Development that this does not remove the need for other consents such as scheduled monument consent. Scheduled Monument Consent is required for any works that would demolish, destroy, damage, remove, repair, alter or add to a monument, or to carry out any flooding or tipping on a scheduled monument.	SSEN Transmission note the need for Scheduled Monument Consent where appropriate.
	West of Scotland Archaeology Service advised that they are the archaeological adviser (inter alia) to Argyll and Bute Council and does not include the Highland Council area.	No further action required regarding consultation with West of Scotland Archaeology Service. SSEN Transmission will consult with The Highland Council (THC) archaeology service via THC planning team where appropriate.
Telecommunications	BT noted no concerns to route A or B or Knocknagael substation extension. However if route C is to be progressed, BT have asked to be re-consulted.	SSEN Transmission acknowledge that should the preferred option change to Route C, that SSEN Transmission would contact BT.

Topic	Comment received	SSEN Transmission Response
Aviation	Highland and Islands Airports noted that their calculations show that, none of the proposed options are anticipated to infringe the safeguarding criteria for Inverness Airport. Therefore, based on the information received for this proposal and options, Highlands and Islands Airports Limited has no objections to the proposal and has no preference on which option is chosen.	No further action required.
Other Issues	NATS Safeguarding noted that the proposed development has been examined from a technical safeguarding aspect and does not conflict with their safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company (""NERL"") has no safeguarding objection to the proposal. However, NATS Safeguarding did state that this response applies specifically to the consultation document and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. Their response does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains SSEN Transmission responsibility to ensure that all the appropriate consultees are properly consulted. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.	SSEN Transmission acknowledge that should there be changes to the proposed information which become the basis of a revised, amended or further application for approval or design, that SSEN Transmission would contact NATS.
	The Coal Authority reviewed the proposed route against their data held and can confirm that the preferred route does not fall within the defined coalfield. On this basis, they had no specific comments to make.	No further action required.