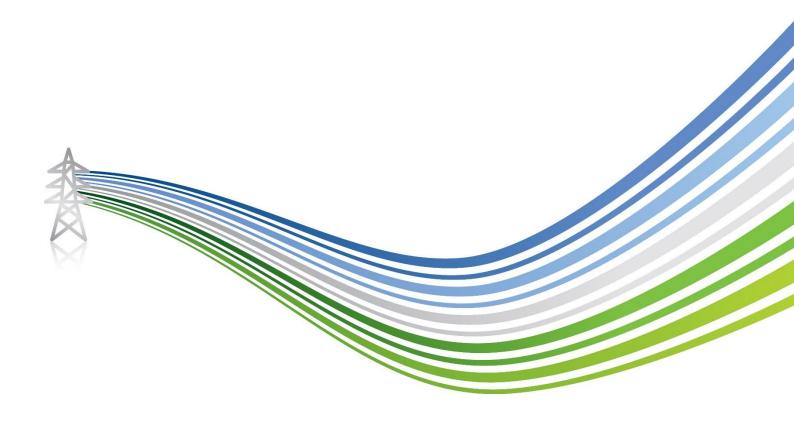


Report on Consultation - Alignment Selection Skye Reinforcement Project March 2022

REF: LT91





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Figure 1.0a to 1.6: Proposed Alignment and Design Solution



GLOSSARY

Term	Definition	
Alignment	A centre line of an overhead line, along with location of key angle structures.	
Alignment (preferred)	An alignment for the overhead line taken forward to stakeholder consultation following a comparative appraisal of alignment options.	
Alignment (proposed)	An alignment taken forward to consent application. It comprises a defined centre line for the overhead line and includes an indicative support structure (tower or pole) schedule, also specifying access arrangements and any associated construction facilities.	
Amenity	The natural environment, cultural heritage, landscape and visual quality. Also includes the impact of SSEN Transmission's works on communities, such as the effects of noise and disturbance from construction activities.	
AOD	Above Ordnance Datum	
Biodiversity Net Gain (BNG)	A process intended to leave nature in a better state than it started using good practice principles established by the Business and Biodiversity Offset Programme (BBOP) and organisations including CIRIA, CIEEM and IEMA.	
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, normally, with the objective of influencing decisions, policies or programmes of action.	
Design Solution	The design of the transmission infrastructure (location, structure type) between Fort Augustus and Ardmore	
Environmental Impact Assessment (EIA)	A formal process set down in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 used to systematically identify, predict and assess the likely significant environmental impacts of a proposed project or development.	
Habitat	Term most accurately meaning the place in which a species lives, but also used to describe plant communities or agglomerations of plant communities.	
Habitats Regulations Appraisal (HRA)	Under the Habitats Regulations ¹ , all competent authorities must consider whether any plan or project will have a 'likely significant effect' on a European site. Where such an effect is identified, the competent authority must carry out an 'appropriate assessment'. This is known as Habitats Regulations Appraisal (HRA).	
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).	
Limit of Deviation (LOD)	The area either side of the proposed alignment within which micrositing of structures may take place in accordance with the conditions of the Section 37 consent.	

¹ The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended), known as the Habitats Regulations, transpose the legal obligations of the Habitats Directive (Council Directive 92/43/EEC) to identify and protect sites that are internationally important for threatened habitats and protected species,



Term	Definition	
Micrositing	The process of positioning individual structures to avoid localised environmental or technical constraints.	
Mitigation	Term used to indicate avoidance, remediation or reduction of adverse impacts.	
National Scenic Area (NSA)	A national level designation applied to those landscapes considered to be of exceptional scenic value.	
New Suite of Transmission Structures (NeSTS)	A project to create and implement a new design of overhead transmission line structures.	
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.	
Reactive Compensation	Reactive compensation is the process of adding or injecting positive and/or negative power to a power system to essentially attain voltage control.	
Route	A linear area of approximately 1 km width (although this may be narrower/wider in specific locations in response to identified pinch points / constraints), which provides a continuous connection between defined connection points.	
Route (preferred)	A route for the overhead line taken forward to stakeholder consultation following a comparative appraisal of route options.	
Route (proposed)	A route taken forward following stakeholder consultation to the alignment selection stage of the overhead line routeing process.	
Routeing	The work undertaken which leads to the selection of a proposed alignment, capable of being taken forward into the consenting process under Section 37 of the Electricity Act 1989.	
Scheduled Monument	A monument which has been scheduled by the Scottish Ministers as being of national importance under the terms of the 'Ancient Monuments and Archaeological Areas Act 1979'.	
Section	Due to the length of the project, it has been necessary to split the broad corridor into 'sections' to more easily describe, identify and assess route and alignment options. There are seven sections from Section 0 to Section 6.	
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.	
Skye Reinforcement Project	The current project being consulted upon.	
Span	The section of overhead line between two supporting structures.	
Special Area of Conservation (SAC)	An area designated under the EC Habitats Directive to ensure that rare, endangered or vulnerable habitats or species of community interest are either maintained at or restored to a favourable conservation status.	
Special Protection Area (SPA)	An area designated under the Wild Birds Directive (Directive74/409/EEC) to protect important bird habitats.	
Stakeholders	Organisations and individuals who can affect or are affected by SSEN Transmission works.	



Term	Definition
The National Grid	The electricity transmission network in Great Britain.
Underground Cable	An electric cable installed below ground, protected by insulating layers and marked closer to the surface to prevent accidental damage through later earthworks.
Variant	An alternative alignment or design solution proposed to avoid localised constraints.
Volts	The international unit of electric potential and electromotive force.
Wayleave	A voluntary agreement entered into between SSEN Transmission and a landowner upon whose land an overhead line is to be constructed for the installation and retention of the transmission equipment.
Wild Land Area (WLA)	A series of 42 mapped areas which have been identified by NatureScot as comprising the most extensive areas of high wildness within Scotland, following a process of interpretive mapping and site survey. WLA is not a statutory designation but these areas are considered to be nationally important.



PREFACE

This Report on Consultation has been prepared by ASH Design + Assessment Limited on behalf of Scottish and Southern Electricity Networks Transmission (herein referred to as 'SSEN Transmission'), operating under licence as Scottish Hydro Electric Transmission plc. This report has been prepared to provide a summary of the responses received from stakeholders (including statutory and non-statutory consultees, local communities, landowners and individual residents) during consultation between September 2021 and January 2022 in response to the preferred alignment and design solution identified for the proposed Skye Reinforcement Project between Fort Augustus Substation and Ardmore Substation on the Isle of Skye.

The preferred alignment and design solution, and the reasons for the design decisions taken during the alignment selection stage of the project, are set out in a Consultation Document², published in September 2021. The Consultation Document: Alignment Selection (September 2021) is available online via the project web page at https://www.ssen-transmission.co.uk/projects/skye-reinforcement/

Public consultation events detailing the preferred alignment and design solution described in the Consultation Document: Alignment Selection (September 2021) were held at the following times and locations:

Dunvegan	28 th September 2021	15.00 – 19.00
Community Hall, Dunvegan		
Broadford Village Hall, Broadford	29 th September 2021	15.00 – 19.00
Glenelg Village Hall, Glenelg	30 th September 2021	1 5.00 – 19. 00
Kyleakin Village Hall, Kyleakin	04 th October 2021	15.00 – 19.00
Glengarry Community Hall,	05 th October 2021	1 5.00 – 19. 00
Invergarry		
Fort Augustus Village Hall, Fort	06 th October 2021	15.00 – 19.00
Augustus		

Virtual consultation events were also held via the project web page on 13th October 2021 between 13.00 – 15.00 and 17.00 to 19.00.

On receipt of the Consultation Document: Alignment Selection (September 2021) or attendance at a consultation event, comments were sought from stakeholders on the preferred alignment and design solution, a summary of which is provided in this report.

This Report on Consultation also confirms how SSEN Transmission have responded to comments received by stakeholders on the preferred alignment and design solution, and details the actions that will be taken as the project progresses through to the EIA and consenting stage.

² Skye Reinforcement Project: Consultation Document: Alignment Selection (September 2021), produced by SSEN Transmission



EXECUTIVE SUMMARY

Scottish and Southern Electricity Networks Transmission (herein referred to as 'SSEN Transmission'), operating under licence as Scottish Hydro Electric Transmission plc (herein referred to as 'SHE Transmission') are proposing to construct and operate a new 132 kV overhead transmission line (OHL) between Fort Augustus Substation and Ardmore Substation on the Isle of Skye, Scotland. The project being promoted is known as the Skye Reinforcement Project.

The existing 132 kV OHL from Fort Augustus to Ardmore on the Isle of Skye ("the existing OHL") is the sole connection from the mainland electricity transmission system to Skye and the Western Isles. Recent studies into the condition of the existing OHL have confirmed that the section between Quoich Substation and Ardmore Substation is required to be rebuilt and, upon completion of construction of the new OHL, the existing OHL would be removed. Furthermore, as a result of an increase in the renewable energy projects for which access to the electricity transmission network is being formally requested, there is a requirement to increase the capacity of the existing OHL for the entirety of its length between Ardmore and Fort Augustus. This includes replacing the recently constructed Skye Tee and Quoich to Aberchalder OHLs between Fort Augustus and Quoich. These OHLs would be decommissioned and dismantled on completion of the new higher capacity OHL.

To facilitate this asset replacement and meet this increased capacity requirement, a new double circuit 132 kV transmission connection is required between Fort Augustus Substation and Edinbane Substation. This will comprise a new double circuit steel lattice structure for the majority of the route, with underground cable proposed in two sections to mitigate a likely significant effect, or as a means of rationalising the OHL network. A new single circuit trident H wood pole (H pole) OHL, is also required between Edinbane Substation and Ardmore Substation. In total, the length of the transmission connection would be over 160 km. The existing OHL between Fort Augustus Substation and Broadford Substation would be removed, as well as the existing 132 kV wood pole line between Broadford Substation and Ardmore Substation. The new transmission connection is referred to in this Report on Consultation as "the Proposed Development".

Work to date on the project has focussed on the identification of a proposed route and preferred alignment / design solution to take forward to a future consent application.

In March 2020, a Consultation Document was prepared to set out the project need and describe the Skye Reinforcement Project, seeking comments from stakeholders and members of the public on the route option studies undertaken, and the rationale for, and approach to, the selection of the preferred route.³ Comments received were documented in a Report on Consultation (November 2020) which set out the consultation process for the project between mid-November 2019 and end of June 2020, during the route option stage of the project.⁴

The Report on Consultation (November 2020) confirmed that the preferred route put forward in the Consultation Document: Route Options (March 2020) in Sections 0, 1, 4, 5 and 6 would be taken forward as the proposed route for the consideration of alignment⁵ options. In Section 2 (North of Sligachan to Broadford) and Section 3 (Broadford to Kyle Rhea), the Report on Consultation (November 2020) confirmed that given the consultation responses received and the sensitivities and challenges present within these sections, further engineering and environmental review of the options available was required prior to identifying a proposed route, preferred alignment and design solution.

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³ SSEN Transmission, (March 2020): Skye Reinforcement Consultation Document: Route Options.

⁴ SSEN Transmission, (November 2020): Report on Consultation - Route Options: Skye Reinforcement Project.

 $^{^{\}mbox{\scriptsize 5}}$ A centre line of an overhead line, along with the location of key angle structures.



The Consultation Document: Alignment Selection (September 2021)⁶ described how the preferred alignment and design solution has been selected to provide an optimum balance of environmental, technical and economic factors, and has been informed through a collaborative working approach between environmental and engineering teams, as well as preliminary input from statutory consultees. The preferred alignment is generally routed adjacent to, or within the vicinity of, the existing OHL. The preferred design solution typically comprises single circuit wood pole OHL between Ardmore and Edinbane (Section 0), and steel lattice OHL between Edinbane and Fort Augustus Substation. In two areas; approximately 15 km between Glen Varragill Forest (north of Sligachan) and Luib (Section 2); and the final 9 km⁷ on approach to Fort Augustus Substation (Section 6), the preferred design solution presented in the Consultation Document: Alignment Selection (September 2021) is underground cable to mitigate likely significant landscape and visual effects, or to facilitate rationalisation of the electricity network.

This Report on Consultation documents the consultation process which has been undertaken for the project between September 2021 and January 2022. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for, and approach to, the selection of the preferred alignment and design solution.

This report summarises the responses received and provides detail on the actions proposed in response to the issues raised prior to the identification of a proposed alignment and design solution to be taken forward as the project progresses to the EIA and consenting stage.

⁶ SSEN Transmission, (September 2021): Skye Reinforcement Consultation Document: Alignment Selection.

 $^{^{7}}$ Shown as approximately 6 km in the Consultation Document (September 2021) but subsequently extended.



1. INTRODUCTION

1.1 Overview and Purpose of Document

- 1.1.1 SSEN Transmission is proposing to construct and operate a new double circuit steel structure 132 kV overhead transmission line (OHL) between Fort Augustus Substation and Edinbane Substation and a new single circuit trident H wood pole (H pole) OHL between Edinbane Substation and Ardmore Substation. The project would also comprise approximately 24 km of underground cable, split over two sections, proposed to mitigate a likely significant effect, or as a means of rationalising the OHL network. The project is referred to as the Skye Reinforcement Project (and hereafter as the Proposed Development).
- 1.1.2 The existing 132 kV electricity transmission OHL from Fort Augustus to Ardmore on the Isle of Skye ("the existing OHL") is the sole connection from the mainland electricity transmission system to Skye and the Western Isles. Recent studies into the condition of the existing OHL have confirmed that the section between Quoich Substation and Ardmore Substation is required to be rebuilt and, upon completion of construction of the Proposed Development, the existing OHL would be removed. Furthermore, as a result of an increase in renewable energy projects for which access to the electricity transmission network is being formally requested, there is a requirement to increase the capacity of the existing OHL for the entirety of its length between Ardmore and Fort Augustus. This includes replacing the recently constructed Skye Tee and Quoich to Aberchalder OHLs between Fort Augustus and Quoich. These OHLs would be decommissioned and dismantled on completion of the new higher capacity OHL.
- 1.1.3 To facilitate this asset replacement, and also meet increased capacity requirements, the Proposed Development represents a long-term approach in relation to planning for future transmission infrastructure requirements to Skye, particularly having regard to targets fixed by the Scottish and UK Governments to achieve net zero by 2045 and 2050 respectively. The policy objection of "net zero" is the reduction of carbon emissions by 100% from 1990 levels by 2050 in order to avoid the worst impacts of climate change and seeks to limit global warming to 1.5 degrees centigrade. This target also applies to all sectors of the economy, including energy.
- 1.1.4 This Report on Consultation documents the consultation process for the project between September 2021 and January 2022, during the alignment selection stage of the project. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the preferred alignment and design solution⁸.
- 1.1.5 The report also describes the key responses received and details the actions taken in response to the issues raised.

1.2 Project Background

- 1.2.1 In March 2020, a Consultation Document³ was prepared to set out the project need and describe the Skye Reinforcement Project, seeking comments from stakeholders and members of the public on the route option studies undertaken, and the rationale for, and approach to, the selection of the preferred route. Comments received were documented in a Report on Consultation (November 2020)⁴ which set out the consultation process for the project between mid-November 2019 and end of June 2020, during the route option stage of the project.
- 1.2.2 The Report on Consultation (November 2020)⁴ also confirmed that the preferred route in Sections 0, 1, 4, 5 and 6 would be taken forward as the proposed route for the consideration of alignment⁹ options. In Sections 2 and

⁸ Identified within the Skye Reinforcement Consultation Document: Alignment Selection (September 2021), produced by SSEN Transmission

 $^{^{9}}$ A centre line of an overhead line, along with the location of key angle structures.



- TRANSMISSION
 - 3, given the consultation responses received and the sensitivities and challenges present within these sections, further engineering and environmental review of the options available was required prior to identifying a proposed route, preferred alignment and design solution.
- 1.2.3 Work has since been carried out to seek to determine a proposed route for Sections 2 and 3 and a preferred alignment and design solution for all sections of the OHL, whilst also considering alternative OHL alignment options and design solutions. The results of this work were summarised in the Consultation Document: Alignment Selection (September 2021).¹⁰

1.3 Objectives

- 1.3.1 The objectives of this report are:
 - To document the consultation process between September 2021 and January 2022;
 - To summarise feedback received from stakeholders;
 - To document actions undertaken in response to feedback where relevant; and
 - To clearly set out how the decisions that have been made as a result of the consultation.

1.4 Document Structure

- 1.4.1 This Report on Consultation is structured as follows:
 - Chapter 1: Introduction providing an overview and background to the project, and setting out the purpose of the Report on Consultation;
 - Chapter 2: Project Need and Overview sets out the project need and provides a description of the key components of the project;
 - Chapter 3: Consideration of Alignment Options summarises the process undertaken to identify the preferred alignment and design solution;
 - Chapter 4: The Consultation Process describes the framework for consultation and methods which have been employed;
 - Chapter 5: Consultation Responses from Statutory and Non-Statutory Consultees summarises the responses from these bodies;
 - Chapter 6: Community Responses summarises the responses received from the local community;
 - Chapter 7: Project Responses to Consultation describes how the comments and issues raised during consultation will be addressed as the project progresses; and
 - Chapter 8: Conclusions and Next Steps provides a summary of the conclusions reached and actions going forward.

1

 $^{^{10}}$ Skye Reinforcement Project: Consultation Document: Alignment Selection (September 2021), produced by SSEN Transmission



2. PROJECT NEED AND OVERVIEW

2.1 Introduction

- 2.1.1 An overview of the existing infrastructure, the need for the project and the work undertaken by SSEN Transmission to assess the electricity transmission infrastructure requirements (system planning pathway) has been set out in the Consultation Document at route options stage (March 2020)³. Subsequently, SSEN Transmission submitted its initial needs case to Ofgem¹¹, setting out an evidence based and economically justified case for replacement of the existing OHL between Fort Augustus and Ardmore on the Isle of Skye. That case has now been approved by Ofgem in their Initial Needs Case Consultation document¹².
- 2.1.2 An overview of the project need is provided in this Chapter. Further details on project need and consideration of other strategic reinforcement options to deliver the connection requirements are included in the initial needs case, also available at https://www.ssen-transmission.co.uk/projects/skye-reinforcement.

2.2 Existing Transmission Infrastructure

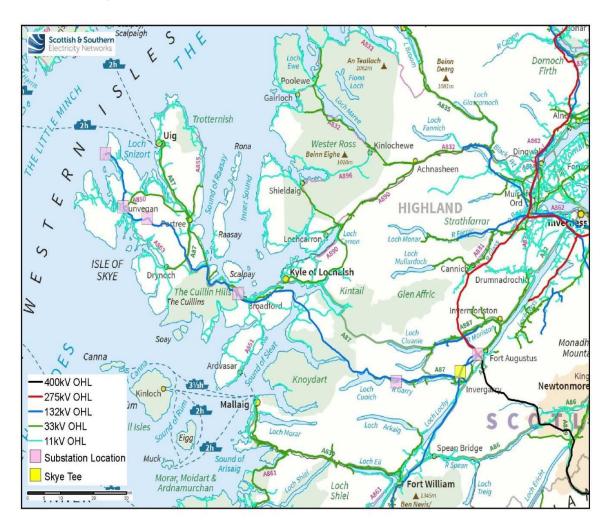
- 2.2.1 SSEN Transmission, operating under licence held by Scottish Hydro Electric Transmission plc, operates and develops the high voltage electricity transmission system in the north of Scotland and remote islands.
- 2.2.2 The existing single circuit 132 kV OHL from Fort Augustus to Ardmore on the Isle of Skye extends over 160 km in length and is the sole connection from the mainland national grid to Skye and onwards, via subsea cable to the Western Isles. The security of supply on Skye and the Western Isles is dependent on this circuit. The existing OHL to Skye is made up of distinct sections, which were constructed at different times over the last 65 to 70 years in response to changing needs. This comprises of the following (see also Plate 2.1):
 - 1. Fort Augustus Substation to Skye Tee (near Invergarry) a 9 km section of OHL from Fort Augustus to the Skye Tee point, of trident wood pole construction and completed in June 2017;
 - Aberchalder (Skye Tee) to Quoich Recently constructed OHL of trident wood pole construction. This
 OHL has been constructed as an asset replacement to the existing single circuit 132 kV steel lattice
 OHL through this area which was constructed in the mid 1950's to connect the Quoich hydroelectric
 power station to the grid;
 - Quoich to Broadford double circuit of steel lattice towers, strung with a single circuit 132 kV OHL constructed between 1979 and 1980; and
 - 4. Broadford to Ardmore single circuit of trident wood pole, strung with a single circuit 132 kV OHL constructed in 1989.
- 2.2.3 From Ardmore, there are two Scottish Hydro Electric Power Distribution (SHEPD) owned 33 kV subsea cables; one to Loch Carnan on South Uist and the other to the Isle of Harris. The line continues from the Isle of Harris as a 132 kV transmission circuit to Stornoway on the Isle of Lewis.
- 2.2.4 The security of supply on Skye and the Western Isles is dependent on the Skye circuit as the only connection to the mainland Great Britain electricity grid. To enhance supply security on the Western Isles, there are SHEPD owned backup diesel generators at Battery Point and Arnish (both connected at Stornoway) to support Lewis and Harris, and diesel generators at Loch Carnan and Barra to support the Uists. Additionally, SHEPD use mobile backup diesel generation to secure supplies on the Isle of Skye. Therefore, in the event of a fault on the main line, customer supplies are solely reliant on ageing backup generators, with associated impacts on greenhouse gas emissions.

 $^{^{11}}$ Skye 132 kV Reinforcement Initial Needs Case Submission (July 2021), produced by SSEN Transmission

 $^{^{12}}$ Isle of Skye project – Initial Needs Case consultation (December 2021), produced by Ofgem



Plate 2.1: Existing Network



2.3 The Need for the Project

- 2.3.1 Over the past few years, several assessments have been carried out to determine the condition of the existing OHL and associated electricity infrastructure, including existing substation equipment. In addition, more applications for the generation and demand connections on Skye have been received over that period. This has caused SSEN Transmission to review the needs case for the project and the approach for upgrading the Skye transmission network to ensure that the best sustainable long-term solutions are identified. The need for the Skye Reinforcement Project can be summarised as follows:
 - As a late 1970's build, the existing OHL between Quoich and Broadford is approaching the end of its economic and operational life. Studies have identified a loss of galvanisation in the more exposed areas where steel lattice towers are present, and on wood pole sections of the project, deterioration on poles caused by white rot fungi. As a result, the poles and towers themselves, as well as fittings, earthwires and phase conductors require upgrade or replacement throughout most of the circuit¹³.
 - As the Scottish Government's plan for Net Zero continues to drive increased numbers of renewable
 energy projects, it has become apparent that the area served by the existing OHL provides opportunity
 for new renewable generation projects but lacks available additional capacity to connect them to the

¹³ The Fort Augustus to Skye Tee and Quoich to Aberchalder OHLs have been replaced over recent years, and do not require replacement from an asset health standpoint. However, the replacement OHLs still lack the available capacity estimated for future renewable generation projects, and are therefore included for replacement in this project.



national grid. SSEN Transmission has already identified over 1GW of potential new generation on Skye via stakeholder engagement and discussion with The Highland Council. Furthermore, SSEN Transmission believe that further generation projects are likely, and determined therefore that future capacity in the area is required.

• The existing OHL is the sole connection from the mainland electricity transmission system to Skye and the Western Isles. The proposed reinforcement works will improve security of supply, and reduce the requirement to rely on the diesel generation backup at Loch Carnan and Barra.

2.4 Proposed Development Components

2.4.1 The following table provides a summary of the main components of the Proposed Development on a section by section basis:

Table 2-1 Summary of Main Components of the Proposed Development

Section	Design Solution	Other Ancillary / Associated Works
Section 0: Ardmore Substation to Edinbane Substation	Wood pole OHL for the entirety of this section (approximately 27 km). Wood pole structures approximately 13 m in height (including insulators and support), depending on ground conditions.	Temporary construction access, wood pole working areas, formation of new bellmouths off the public road, construction compounds and tree / vegetation clearance. Dismantling of the existing 132 kV wood pole OHL
Section 1 – Edinbane to North of Sligachan	Steel lattice OHL for the entirety of this section (approximately 20 km in length) from Edinbane Substation to a terminal tower and cable sealing end compound at approximate grid reference 148068 832110.	Temporary and permanent construction access and steel lattice tower working areas, cable sealing end compounds, formation of new bellmouths off the public road, construction compounds and borrow pits and tree / vegetation clearance. Dismantling of the existing 132 kV wood pole OHL
Section 2 – North of Sligachan to Broadford	Underground cable for approximately 15 km, from a new sealing end compound at approximate grid reference 148068 832110 (as per Section 1) to a new cable sealing end compound near Luib (approximate grid reference 156389 827438). From here, a new steel lattice OHL proposed to Broadford Substation.	Temporary and permanent construction access, underground cable and steel lattice tower working areas, cable sealing end compounds, formation of new bellmouths off the public road, construction compounds and borrow pits and tree / vegetation clearance. Dismantling of the existing 132 kV wood pole OHL
Section 3 – Broadford to Kyle Rhea	Steel lattice OHL for the entirety of this section (approximately 20 km in length) from Broadford Substation to the existing crossing towers at Kyle Rhea. An alternative option remains under consideration through Glen Arroch and Kylerhea due to sensitivities of routeing a new OHL through the Kinloch and Kyleakin Hills SAC. This alternative option would comprise a new steel lattice OHL from Broadford Substation to the existing OHL crossing towers at Kyle Rhea via Glen Arroch (approximately 20 km in length).	Temporary and permanent construction access and steel lattice tower working areas, formation of new bellmouths off the public road, construction compounds and borrow pits and tree / vegetation clearance. Dismantling of the existing 132 kV steel lattice OHL
Section 4 – Kyle Rhea to Loch Cuaich	Steel lattice OHL for the entirety of this section (approximately 38 km in length) from the existing crossing towers at Kyle Rhea to Loch Quoich Dam (approximate grid reference 207192 802419).	Temporary and permanent construction access and steel lattice tower working areas, formation of new bellmouths off the public road, construction compounds and borrow pits and tree / vegetation clearance. Dismantling of the existing 132 kV steel lattice OHL
Section 5 – Loch Cuaich to Invergarry	Steel lattice OHL for the entirety of this section (approximately 23 km in length) from Loch Quoich Dam (approximate grid reference 206992 802484) to a new cable sealing end compound near Loch Lundie (approximate grid reference 251139 805410).	Temporary and permanent construction access and steel lattice tower working areas, formation of new bellmouths off the public road, construction compounds and borrow pits and tree / vegetation clearance. Dismantling of the existing 132 kV wood pole (Quoich to Aberchalder) OHL and steel lattice towers.



Section	Design Solution	Other Ancillary / Associated Works
Section 6 – Invergarry to Fort Augustus	An underground cable for the entirety of this section 14, from a new cable sealing end compound near Loch Lundie (approximate grid reference 251139 805410) to Fort Augustus Substation, a distance of approximately 9 km.	Temporary and permanent construction access, underground cable working areas, cable sealing end compounds, construction compounds and borrow pits and tree / vegetation clearance. Dismantling of the existing 132 kV wood pole (Fort Augustus to Skye Tee) OHL

2.5 Other Related Works

- 2.5.1 The Skye Reinforcement Project will give rise to a need to upgrade some of the existing substation infrastructure along the route of the new OHL. Further modifications are also required to existing substations due to asset condition and the need to provide capacity to connect generation proposed on the Isle of Skye. The proposed substation works are summarised below:
 - Broadford Substation: Installation of a new 132 kV indoor switching station, a new 132/33 kV transformer, outdoor circuit breakers and indoor reactive compensation measures at the existing Broadford Substation site; and
 - Edinbane Substation: Installation of a new 132 kV indoor switching station and establishment of a new indoor substation at the existing Edinbane Substation site.
- 2.5.2 These works will require applications for planning permission under the Town and County Planning (Scotland) Act 1997 (as amended).
- 2.5.3 In addition, there would be a requirement for a new switching station at Quoich Tee, near to the existing tee off at Kingie. This project would be developed separately by SHEPD and does not form part of this project.
- 2.5.4 Modification of the existing 11 and 33 kV distribution network in some areas is also likely to be required to accommodate the new OHL.

2.6 Access during Construction

- 2.6.1 The construction of a new transmission connection approximately 160 km in length is a major undertaking, presenting significant construction challenges not just in terms of scale but also remoteness, terrain and seasonal weather conditions.
- 2.6.2 The commissioning by SSEN Transmission of an experienced OHL contractor (see Part 2.7 of this Chapter) has enabled construction access considerations to be at the forefront during the design process. Whilst construction access details are yet to be finalised, an access track matrix has been developed by the project team considering both construction and operational access requirements, and with reference to NatureScot's good practice guide on constructing tracks in Scottish uplands¹⁵. Typical access solutions are set out below with respect to the different technology types under consideration, and will be subject to on-going review through the design process and EIA stages of the project.
- 2.6.3 In general, proposed construction site access would be taken via the existing public road network and would make use of existing forest and estate tracks as far as practicable, upgraded as required. Existing bellmouths would be utilised where possible, subject to improvements. New bell mouths would be required at a number of locations.

¹⁴ In the Skye Reinforcement Project: Consultation Document – Alignment Selection (September 2021), produced by SSEN Transmission, the design solution within Section 6 of the project comprised an OHL solution for approximately 3.5 km, and an underground cable solution for the final 6 km to Fort Augustus Substation. A decision has since been made by SSEN Transmission to extend the length of underground cable within this section to facilitate rationalisation of the electricity network in this area.

 $^{^{15}}$ Constructed tracks in the Scottish Uplands (Updated September 2015), Scottish Natural Heritage.



- TRANSMISSION
- 2.6.4 Where operational access is required, this would likely range from ATV routes with no formal track to a stone road suitable for 4x4 and waggon access. The selection of the type of track required will consider the proximity to a public road, structure type and potential maintenance activities / vehicles required in future to a given location (taking legal health & safety requirements into account). Access track details will be finalised through the EIA stage of the project and presented to illustrate where each access type will be deployed, and the rationale for that selection.
- 2.6.5 Materials required for the construction of any new stone access tracks are likely to be obtained from on-site borrow pits, or imported from local quarries. The exact location of borrow pits would be dependent upon site surveys, availability of suitable material and proximity to the required location.
 - Wood Pole Construction Access
- 2.6.6 For wood pole construction (i.e. in Section 0), vehicle access is required to each pole location during construction, moving along the line, to allow excavation and creation of foundations and pole installation. Preference will be given to lower impact access solutions including the use of low pressure tracked personnel vehicles and trackway in boggy / soft ground areas to reduce any damage to, and compaction of, the ground. These journeys would be kept to a minimum to minimise disruption to habitats along the route.
- 2.6.7 It is anticipated that helicopters would be used for the delivery of materials to each pole location for wood pole construction in Section 0. The key benefit of helicopter use for wood pole construction is that vehicular access to each pole location (as well as inline access) can be significantly reduced, with delivery of components and erection being facilitated by helicopter.
 - Steel Lattice OHL Construction Access
- 2.6.8 Typically, new stone tracks are likely to be required to access each steel tower location in Sections 1 to 5, as well as the requirement for inline access between towers. Stone tracks are designed to suit the heavy plant loads required for construction works for steel towers, and to suit the varied ground conditions along the route. It is anticipated that stone tracks would be approximately 4 to 6 m in width. On completion of construction, unless required for operational access, the stone tracks would be removed and the original material reinstated.
- 2.6.9 Where access to tower positions is difficult due to steep terrain, alternative methods would be proposed such as using smaller items of plant, specialist tracked plant, and in some cases using helicopters for moving materials.
- 2.6.10 Temporary trackways are an alternative method of providing access, dependent on ground conditions. Although there may be localised areas where trackway may be suitable, it is not considered an appropriate solution for the construction of steel lattice towers on this project in its entirety, due to the length of time they are required to be in place and the weight and size of construction plant that would be required to track over them. Stone tracks generally afford greater reliability and stability compared to trackway solutions. Similarly, the extensive use of wide tracked excavators and other plant without prior ground preparation are unlikely to be a viable solution for this project in its entirety, although they may be used for certain tasks during construction.
- 2.6.11 The use of helicopters for construction of steel lattice towers is feasible, however, the operational restrictions (e.g. weather, proximity to public roads and environmental factors), and the significant cost implications, for a project of this scale are key considerations. The use of helicopters is likely to be required in more remote sections of the project, and where particular environmental or geographical constraints necessitate their use. Where helicopters are used, construction plant would still require access to each tower location to facilitate construction and erection of towers. Helicopter landing zones would also require to be identified.



Underground Cable Construction Access

2.6.12 Installation of an underground cable would typically require a wide construction corridor (approximately 30 to 40 m) to accommodate excavation and cable installation equipment. A construction haul road would be required for much of the cable installation route. After construction, disturbed ground can be reinstated and restored.

Access during Operation

2.6.13 Permanent access tracks are likely to be required in more remote areas where access during construction requires a higher specification track, and where long term maintenance needs require permanent access. It is intended however to keep requirements for permanent access tracks to a minimum. Where required, permanent tracks would be reinstated to a width suitable for 4x4 vehicles.

Forestry Clearance

2.6.14 The Proposed Development would pass through or close to areas of woodland and commercial forestry. Where the Proposed Development passes through areas of woodland or forestry, a wayleave corridor would be required. The width of this corridor would be variable depending on the nature of the woodland or forestry.

2.7 OHL Contractor

- 2.7.1 To inform the alignment selection stage of this project, SSEN Transmission has engaged an experienced OHL construction contractor to carry out a detailed desk-based and site walkover survey to explore the advantages, disadvantages and constructability of OHL alignment options. This has proven valuable at this early stage of the project in terms of providing confidence in the buildability of alignment options, and construction access opportunities. Whilst the full access strategy is still being developed, construction and operational access requirements have been a key consideration in informing the preferred alignment and design solution, utilising existing access where possible and identifying access routes to facilitate the Proposed Development.
- 2.7.2 Other technical considerations such as avoiding cross overs of existing electrical infrastructure (in particular the existing 132 kV OHL) to minimise potential outages of the electricity network (resulting in cost implications and disruption to the consumer) have been a factor in the evaluation of alignment options.
- 2.7.3 Targeted ground investigation works are also being undertaken along the route of the line, which will further inform tower positions, foundation requirements and construction access requirements. This information should be available to inform the EIA stage of the project.

2.8 Biodiversity Net Gain

- 2.8.1 Biodiversity Net Gain (BNG) is a process which leaves nature in a better state than it started. Although it is an internationally recognised process and tool within the development industry, it is not a term that is widely used or implemented in Scotland¹⁶. A small handful of businesses are making voluntary commitments to incorporating BNG into their projects, including SSEN Transmission.
- 2.8.2 SSEN Transmission has developed a BNG toolkit based upon the Natural England metric¹⁷, which aims to quantify biodiversity based upon the value of habitats for nature. It is an efficient and effective method for demonstrating whether development projects have been able to maintain or increase the biodiversity value of a development site after construction works.

¹⁶ CIEEM. 2019. Biodiversity Net Gain in Scotland. CIEEM Scotland Policy Group. https://cieem.net/wp-content/uploads/2019/06/Biodiversity-Net-Gain-in-Scotland-Policy-Group.pdf

 $^{{}^{17}\,\}text{Natural England Biodiversity Metric 2.0 http://publications.naturalengland.org.uk/publication/5850908674228224}$



- 2.8.3 For BNG to be used appropriately and to generate long-term gains for nature, the good practice principles established by the Business and Biodiversity Offset Programme (BBOP)¹⁸ should be followed. These principles have been established in the context of UK development by the Construction Industry Research and Information Association (CIRIA), the Chartered Institute for Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA)⁶.
- 2.8.4 BNG does not apply to statutory designated sites or irreplaceable habitats (e.g. ancient woodland¹⁹, blanket bog)²⁰.

SSEN Transmission's Biodiversity Ambition

- 2.8.5 SSEN Transmission is committed to protecting and enhancing the environment by minimising the potential impacts from their construction and operational activities. As part of this approach, SSEN Transmission has made commitments within its Sustainability Strategy (2018)²¹, Sustainability Plan (2019)²² and RIIO-T2 Business Plan, for new infrastructure projects to:
 - Ensure natural environment considerations are included in decision making at each stage of a project's development;
 - Utilise the mitigation hierarchy to avoid impacts by consideration of biodiversity in project design;
 - Positively contribute to the UN and Scottish Government Biodiversity strategies by achieving an overall 'No Net Loss' on new infrastructure projects gaining consent in 2020 onwards and achieving Net Gain on projects gaining consent in 2025 onwards; and
 - Work with their supply chain to gain the maximum benefit during asset replacement and upgrades.
- 2.8.6 The design and evolution of this project will be carried out in line with these commitments.

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¹⁸ Guidance Notes to the Standard on Biodiversity Offsets (2012). Business and Biodiversity Offsets Programme (BBOP). https://www.forest-trends.org/wp-content/uploads/imported/BBOP_Standard_Guidance_Notes_20_Mar_2012_Final_WEB.pdf

¹⁹ Categories 1a and 2a.

²⁰ CIRIA, CIEEM, IEMA (2019). Biodiversity Net Gain: Good practice principles for development, A Practical Guide. https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf

²¹ Delivering a smart, sustainable energy future: The Scottish Hydro Electric Transmission Sustainability Strategy (2018) https://www.ssentransmission.co.uk/media/2701/sustainability-strategy.pdf

²² Our Sustainability Plan: Turning Ambition into Action. (2019) SHE Transmission. https://www.ssen-transmission.co.uk/media/3215/our-sustainability-plan-consultation-report off



3. CONSIDERATION OF ALIGNMENT OPTIONS

3.1 Introduction

- 3.1.1 The Consultation Document: Alignment Selection (September 2021)²³ sets out the approach to the consideration and appraisal of alignment options and design solutions, informed by SSEN Transmission's guidance 'Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above'. This document helps SSEN Transmission to meet its obligations under Schedule 9 of the Electricity Act 1989, which requires transmission license 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.
- 3.1.2 In consideration of the principles outlined in the guidance document, the method of identifying a preferred alignment and design solution has involved the following four key tasks:
 - Review and update, where required, of the baseline situation established at Stage 2 (Route Options);
 - Identification of alignment options;
 - · Technical and environmental analysis of alignment options and design solutions; and
 - Identification of a preferred alignment and design solution.

3.2 Identification of Preferred Alignment and Design Solution

- 3.2.1 As set out in Part 2.7 of this report, SSEN Transmission has engaged an experienced OHL construction contractor to carry out a detailed desk-based and site walkover survey to explore the advantages, disadvantages and constructability of OHL alignment options. Subsequently, an OHL alignment has been identified by the OHL contractor on the basis of it being the most technically feasible and economically viable alignment, giving due consideration to a range of technical and cost criteria over the construction and operation phases of a new OHL.
- 3.2.2 Alternative OHL alignment options and design solutions (referred to as 'variants') have also been considered by the OHL contractor and project environment and engineering teams as part of the iterative alignment selection process.
- 3.2.3 In considering the potential environmental constraints of alignment options and design solutions, the following tasks have been undertaken:
 - Desk-based review and targeted site survey by project landscape architects, ecologists, ornithologists, archaeologists, geologists and hydrologists to review alignment options and provide advice on variants or micrositing opportunities for positioning of towers and indicative construction access;
 - Targeted Phase 1 / National Vegetation Classification (NVC) habitat surveys and protected species surveys to supplement existing data;
 - Review of ornithological survey data and records for the area, including requests for data held by RSPB, and targeted bird surveys to supplement existing survey data;
 - Review of comments received from stakeholders during the route options stage following publication of the Skye Reinforcement Project Consultation Document (March 2020)³ as detailed within the Report on Consultation (November 2020)⁴;

²³ Skye Reinforcement Project: Consultation Document: Alignment Selection (September 2021), produced by SSEN Transmission



- Workshops with SSEN Transmission, the OHL contractor and environmental consultants to discuss alignment options and variants, prior to the identification of a preferred alignment and design solution;
- Site reconnaissance visits by the SSEN Transmission engineering team and environmental consultants to review alignment options; and
- Workshops with statutory consultees to present the preferred alignment and design solution, and seek preliminary feedback.
- 3.2.4 The preferred alignment and design solution was selected on the basis that it is considered to provide an optimum balance of environmental, technical and economic factors.



4. THE CONSULTATION PROCESS

4.1 Consultation Overview

4.1.1 In accordance with SSEN Transmission's guidance²⁴, a process of consultation on the preferred alignment and design solution has been undertaken. This followed a previous consultation exercise which sought to obtain comments from statutory and non-statutory consultees, including members of the public, during the route options stage of the project⁴.

4.2 Methods for Consultation

Workshops with Statutory Consultees

4.2.1 During the alignment selection process, workshops were held with statutory consultees to seek preliminary feedback on alignment options and design solutions for the project. Attendees included representatives from The Highland Council (THC), NatureScot (NS), Scottish Environment Protection Agency (SEPA), Historic Environment Scotland (HES) and Scottish Forestry (SF). Comments provided by statutory consultees were considered during the alignment selection process.

Consultation Document

- 4.2.2 The Consultation Document: Alignment Selection (September 2021)²⁵ was produced detailing the selection process for the preferred alignment and design solution, taking account of environmental, economic and technical factors. The Consultation Document was distributed to stakeholders for comment, and made available for download in September 2021 from https://www.ssen-transmission.co.uk/projects/skye-reinforcement/
- 4.2.3 **Table 4.1** details the stakeholders in receipt of the Consultation Document: Alignment Selection (September 2021) or otherwise informed of the website details:

Table 4.1: List of Stakeholders

Stakeholders		
Statutory Consultees		
The Highland Council	Historic Environment Scotland	
Scottish Environment Protection Agency	Scottish Forestry	
Nature Scot (previously Scottish Natural Heritage)		
Non-Statutory Consultees		
British Horse Society	British Telecom	
Civil Aviation Authority	Defence Infrastructure	
Fisheries Management Scotland	Highlands and Islands Airports Ltd	
International Otter Survival Fund	Kylerhea Community Forum	
John Muir Trust	Joint Radio Company	
Marine Scotland	Mountaineering Scotland	
National Air Traffic Services	Ness District Salmon Fishery Board	
Royal Society for the Protection of Birds	Scottish Rights of Way and Access Society	

²⁴ SSEN (September 2020), Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above

²⁵ Skye Reinforcement Project: Consultation Document: Alignment Selection (September 2021), produced by SSEN Transmission



Stakeholders		
Scottish Water	Scottish Wildlife Trust	
Scottish Wild Land Group	SEERAD	
Skye and Lochalsh Environment Forum	Transport Scotland	
Visit Scotland	The Woodland Trust Scotland	
West of Scotland Archaeology Service		
Councillors and Politicians		
Various, including Community Councils		
Landowners		
Various within the vicinity of route options.		

- 4.2.4 Landowners, local Community Councils and councillors were made aware of the Consultation Document:
 Alignment Selection (September 2021) by SSEN Transmission, and either emailed a copy or directed to the project webpage where they could download a copy. A feedback form was also made available on the project webpage.
- 4.2.5 Feedback on the Consultation Document was requested by 19th November 2021, although some stakeholders requested an extension in order to provide feedback, which was accepted by SSEN Transmission.
- 4.2.6 Stakeholders were invited to provide feedback by answering a series of questions asked within the Consultation Document requesting comments on specific aspects of the project as follows:
 - Have we adequately explained the need for this Project?
 - Are you satisfied that your approach taken to selecting the preferred alignment and design solution has been adequately explained?
 - Are there any factors, or environmental features, that you consider may have been overlooked during the route and alignment selection process?
 - Do you have any other comments in relation to the drivers for the project, related to the transmission infrastructure requirements, or about the preferred alignment and design solution?

Public Consultation Events

4.2.7 Public consultation events were held at the following times and locations to seek comments and feedback on the preferred alignment and design solution:

Dunvegan	28 th September 2021	15.00 – 19.00
Community Hall, Dunvegan		
Broadford Village Hall, Broadford	29 th September 2021	15.00 – 19.00
Glenelg Village Hall, Glenelg	30 th September 2021	1 5.00 – 19. 00
Kyleakin Village Hall, Kyleakin	04 th October 2021	15.00 – 19.00
Glengarry Community Hall,	05 th October 2021	1 5.00 – 19. 00
Invergarry		
Fort Augustus Village Hall, Fort	06 th October 2021	15.00 – 19.00
Augustus		

4.2.8 Virtual consultation events were also held via the project webpage on 13th October 2021 between 13.00 – 15.00 and 17.00 to 19.00.



- 4.2.9 The virtual consultation events were advertised using various platforms, local newspapers, the West Highland Free Press, and the Press and Journal, SSEN Transmission's social media channels, Facebook and Twitter and the dedicated project webpage. In addition, a postcard was delivered to 9,194 homes and businesses within the locale advertising the dates, times and locations of the face to face and virtual consultation events.
- 4.2.10 Visitor counts during the virtual consultation events recorded 67 unique users (individual devices accessing the site) and 120 page views (the number of different pages loaded across the site) across the two interactive sessions. Only one chat was initiated with the project team via the live chat function to raise one query. In addition, one associated follow up email was received by SSEN Transmission further to the virtual consultation events.



5. CONSULTATION RESPONSES FROM STATUTORY AND NON STATUTORY CONSULTEES

5.1 Summary of Feedback

5.1.1 **Table 5.1** sets out a summary of the feedback received by statutory and non-statutory consultees following the consultation period (September 2021 to January 2022). A response to the feedback is also provided by SSEN Transmission, together with confirmation of the action to be taken, where relevant.

Table 5.1: Statutory and Non-Statutory Consultee Feedback

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Statutory Consu	ıltees	
The Highland Council (THC) Section 0: THC has no further comments to make at this stage on the alignment within Section 0, however, the lack of any specific comment at this stage does not mean that THC are satisfied as to the acceptability.		SSEN Transmission will continue to keep THC informed of the project through the EIA stage.
	Section 1: THC has no further comments to make at this stage on the alignment of Section 1, however, the lack of any specific comment at this stage does not mean that they are hereby satisfied as to the acceptability.	
	Section 2: THC acknowledge that the newly proposed extent of undergrounding as shown in the Consultation Document does not cover the entirety of the proposed route in Section 2 through the NSA, with the southern end of this cable to be an overhead line. Subject to provision of further information regarding the extent of visibility of this section of overhead line within the NSA, particularly from sensitive receptors such as users of the A87, THC are satisfied that this may be appropriate should it be suitably screened from intervening topography and not having a skylining effect which would detrimentally detract from views towards the distinctive Cuillin Hills' summits.	SSEN Transmission welcome comments made by THC in respect of the preferred alignment and design solution in Section 2 and acknowledge the sensitivities and challenges of installing an underground cable within this area. Nevertheless, SSEN Transmission believe that the design solution proposed is the most appropriate solution for this part of Section 2 given the landscape and visual sensitivities present. A detailed landscape and visual assessment will be carried out as part of the EIA stage of the project, and further mitigation measures to minimise adverse effects will be explored. A detailed restoration plan for undergrounding works within Section 2 will
	the line removes the dominating effect that any overhead line solution would have on the landscape setting and visual amenity of the heads of Loch Sligachan and Loch Ainort. THC suggest the proposed undergrounding solution is likely to give rise to other potential significant adverse	be developed during the EIA stage of the project. With respect to transportation options during construction, and potential for longer term retention of access tracks for walking / cycling use, this will be discussed further with the Council,



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	environmental effects, as well as deliverability challenges, however, SSEN Transmission have committed to finding a solution to deliver this. THC suggest the UGC is not without	interested parties and landowners during the EIA stage of the project.
	landscape and visual effects, with substantial mitigation likely to be required to help integrate the construction corridor into the landscape.	
	THC note that SSEN Transmission have also discussed the transportation implications of the preferred alignment and design solution in Section 2 with the Council's Transport Planning Team and are understood to be exploring options, including the possibility for creating a walking / cycling route.	
	Section 3: For Section 3, THC note that both route options would cross the Kinloch and Kyleakin Hills Special Area of Conservation (SAC) / Site of Special Scientific Interest (SSSI) and could result in an adverse effect on site integrity, whilst also giving rise to likely significant landscape and visual effects. Ongoing consultation is required with both the Planning Authority and NatureScot to consider and agree the finalised routing option for this section, however it would appear that the landscape and visual effects are judged to be greater should Route Option 3B be selected.	Within Section 3 of the project, through the Kinloch and Kyleakin Hills SAC, whilst a preferred alignment and design solution has been identified, an alternative option via Glen Arroch has not been ruled out at this stage. As such, both options continue to be assessed through the EIA stage of the project until a final decision has been made prior to the section 37 application being submitted. This decision will be informed through the Habitats Regulation Appraisal and EIA process, including continued consultation with THC and NatureScot.
	THC note that for Route Option 3A (the preferred alignment) there is already the presence of the existing line in the view, and whilst the preferred alignment would be at a higher elevation, it should not be skylining and its visibility could potentially be mitigated by further woodland planting. In contrast, should Route Option 3B be selected, this would introduce new visibility for Kylerhea and from the mainland settlements of Glenelg as well as from the small ferry crossing, with construction of the line here also requiring tree felling.	

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	THC suggests that in Section 3 weight in the decision-making process should be attributed to the European importance of the protected habitats of the Kinloch and Kyleakin Hills SAC, and to what degree these effects can be mitigated for both routing options.	
	Section 4: THC make note of the deviation to the preferred alignment at Loch Coire Shubh (near Kinloch Hourn) in comparison to the existing OHL, and acknowledge that the deviation is due to health and safety concerns associated with developing towers along the existing OHL alignment. THC also note that NatureScot have previously raised landscape and visual concerns at this location, noting that the OHL is likely to cause a significant adverse impact on the special qualities of the Knoydart NSA. It is therefore suggested by THC that a design workshop take place to agree the finalised alignment and tower positions.	The preferred alignment at Loch Coire Shubh has sought to minimise landscape and visual impacts where possible whilst also ensuring the constructability of the OHL in accordance with health and safety requirements and legislation. A further workshop was held with THC and NatureScot during January 2022. At this workshop, SSEN Transmission explained the challenges associated with alignment options within this location, particularly with respect to terrain and proximity to Loch Coire Shubh, and the decision making process to arrive at the preferred alignment. This reasoning was generally accepted by THC and NatureScot, albeit the sensitivities of this part of the route were highlighted.
	Section 5 and 6: THC note that work is also ongoing to rationalise the energy transmission network, specifically within Section 6 of the line. This matter was previously raised by Council Members, as was the potential for the provision of a substation to facilitate connections to the grid for individual households at Upper Glengarry within Section 5. It would be useful if scope for further rationalisation and for such localised connections could be examined further and explained through EIA and Scoping.	Since publication of the Consultation Document ²⁶ , it is now proposed to extend the length of underground cable within Section 6, from a new cable sealing end compound near Loch Lundie (approximate grid reference 251139 805410) to Fort Augustus Substation, a distance of approximately 9 km. Figure 1.6 shows the proposed alignment and design solution, in comparison with the preferred alignment and design solution. SSEN Transmission have taken this decision to facilitate rationalisation of the electricity network in this area. Other localised connections are outwith the scope of the Skye Reinforcement Project, but SSEN Transmission will continue to update THC on other connection projects.

²⁶ Skye Reinforcement Project: Consultation Document: Alignment Selection (September 2021), produced by SSEN Transmission



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	Access: THC outline that it would be helpful if they were to be kept in the loop with consultation on any matters relating to temporary access throughout the Skye Reinforcement Project. THC note that they fully appreciate that SSEN Transmission's main remit is to secure access and wayleave agreements for both temporary and permanent works, however such temporary works may offer communities the opportunity to improve public access such as improving existing routes or providing a link between them.	Further consultation will be carried out with THC's access officer as well as other interested groups to identify any legacy benefits. Such potential benefits will need to be balanced against other environmental and land use considerations to ensure they are appropriate for any particular location.
	Fibre Broadband: From the consultation documentation THC noted that the towers would require a fibre cable to be laid on the ground. Whilst it was explained that this would not usually be open to connectivity by any third party telecoms providers (in part due to wayleave agreements already being in place with land owners), the Planning Authority would encourage scope for this to be explored further with telecoms providers and local communities that may benefit from utilising this infrastructure should they not already have access to highspeed broadband.	Opportunities for connection to fibre broadband are not within the remit of this transmission project.
	NeSTS: Whilst the Planning Authority understands and agrees with SSEN Transmission reasoning for not proposing New Suite of Transmission Structures (NeSTS), except where these have already been installed to date at Quoich, THC suggest there could be other specific sections along the route which may warrant their introduction due to span width constraints and therefore they would encourage NeSTS use not to be fully discounted at this stage.	The use of NeSTS has been considered on this project during the alignment selection stage in particular areas to navigate challenging terrain, or to offer an alternative OHL solution that could potentially result in greater span lengths and fewer structures. Whilst NeSTS can offer these advantages, it was considered that the more solid appearance of the NeSTS towers would have similar, if not more prominence than the steel lattice towers in this landscape. The transition between structure types if NeSTS were proposed in isolated areas could also result in a visually confusing wirescape. Furthermore, although the taller towers allow greater spans, it is not always possible to take advantage of this due to topography. Therefore, at this stage, the use of NeSTS is not proposed as part of



Stakeholder	Summary of Feedback	Response by SSEN Transmission
		the Skye Reinforcement Project, but their use on other parts of the network owned and operated by SSEN Transmission will continue to be considered.
	Other: In principle support for the project has been outlined by THC, albeit further information and assessment is required That said, THC believe that the scheme is progressing in the right direction and that SSEN Transmission have taken on board the pre-application advice received from stakeholders to date.	SSEN Transmission welcome the preliminary support for the project noted by THC, and will continue to work closely with the Council as the project progresses.
NatureScot (NS)	Section 0: NatureScot (NS) note that the preferred alignment passes through the An Cleiach SSSI, protected for geological interests. NS recommend that siting of infrastructure is planned as to avoid direct impacts on the features of these sides so that rock faces and outcrops remain accessible and undamaged.	As noted in the Consultation Document: Alignment Selection (September 2021), it is considered the construction of the OHL could be achieved without likely significant effects on the notified features of the SSSI through the micro-siting of poles to avoid rocky outcrops.
	Section 1: NS note that the alignment in Section 1 crosses watercourses upstream of the nearby Sligachan Peatlands SSSI and SAC, therefore mitigation of potential impacts regarding silt and pollution prevention should be considered. The preferred alignment also brings the line closer to ornithological sensitivities, both north of the B885 and close to the Mugeary/Tungadal Forest. From an ornithology perspective, NS suggests it may be preferable to use an alignment either closer to, or east of, the existing OHL. However, that decision should be informed by further ornithological data, and the consideration of other aspects (e.g. landscape and peat).	The potential for indirect impacts on the Sligachan Peatlands SSSI and SAC will be considered in the EIA Report, along with appropriate mitigation measures to minimise the potential for effect. As noted in the Consultation Document: Alignment Selection (September 2021), moorland breeding bird surveys, flight activity surveys for white-tailed eagle and golden eagle, and searches for nest sites have been undertaken throughout 2021, to supplement existing data and inform alignment selection within Section 1. Ornithological sensitivities throughout Section 1 are noted, but SSEN Transmission and their ornithological advisers believe an OHL can be achieved, subject to assessment through the EIA process, and the implementation of appropriate mitigation measures. Peat probing surveys have been undertaken to inform the siting of tower positions, and a peat management plan will be developed as part of the EIA Report. The disruption to peatlands and



Stakeholder	Summary of Feedback	Response by SSEN Transmission
		areas of deeper peat will be minimised as far as practicable.
		The preferred alignment and design solution therefore balances these concerns against the likely landscape and visual effects of a steel lattice OHL through this area.
	Section 2: NS welcome and support Variant 2A (the underground cabling option for North of Sligachan to Luib), and consider it will be less likely to result in significant effects on the special qualities of the Cuillin Hills National Scenic Area (NSA), as well as the Cuillin Wild Land Area (WLA). However, the installation of an underground cable within Section 2 would present a number of technical and environmental challenges. NS further advise that associated infrastructure, particularly access tracks, could significantly add to visual impacts in the short and potentially long term. NS would like to see careful siting of tracks and effective restoration, but particularly in areas with thin soils. As such, NS would advise that a Landscape Clerk of Works (LCoW) oversee the restoration of construction works within this section. The Cuilllin Hills Special Protection Area (SPA) covers much of Section 2 and well as some of Sections 1 and 3, and is protected for golden eagles. NS acknowledge that the preferred alignment is across lower ground, is close to the existing OHL, and is in part undergrounded through this section. Nevertheless, NS advise that survey and assessment work should be used to inform the alignment in order to minimise effects to the SPA and identify mitigation requirements. Such work will also be required to inform the HRA to demonstrate	Support for underground cabling as part of the design solution within Section 2 from NS is welcomed. Comments in relation to the challenges presented, and the importance of careful siting of tracks, and effective restoration, are noted. Further information will be provided in the EIA Report. The EIA Report will set out the likely significant effects on the Cuillins SPA, and effects on integrity would be considered within a HRA.
	no adverse effect on site integrity. Section 3: NS has previously advised that a	Advice from NS in relation to the potential
	new OHL within the currently proposed route has the potential to adversely affect the Kinloch and Kyleakin Hills SAC and SSSI. NS maintain that it will be difficult to	for adverse effects on site integrity of either Route Option 3A or 3B on the Kinloch and Kyleakin Hills SAC / SSSI is noted. Whilst a preferred alignment and design solution has been identified (3A),



demonstrate no adverse effect on site integrity as a result of the proposals. NS advise that all options continue to be kept open for consideration, including the possibility of undergrounding part or all of Route Option 38, until further assessment and a shadow HRA are concluded. NS request detailed habitat and species assessments for both route options, and would welcome continued dialogue. NS also advise that the final route decision needs to be weighted according to the legislative and policy context. They also note that some benefits suggested for one route could equally apply to another, e.g. the possibility for woodland regeneration. NS would also like to see details of operational access track requirements as well as how the existing OHL will be removed. NS reiterate previous advice on the sensitivity of a route through the SAC and the difficulty in demonstrating no adverse effect on site integrity. NS believe that Route Option 38 would traverse the lesser amount of the most sensitive habitats (blanket bog and broadleaved woodlands) in the SAC, and less damage to the SAC. This view is not final, however. Further information would be required on construction methods and operational management practices, as well as extent of habitat loss, to inform an Appropriate Assessment. If the integrity of the site will be adversely affected, NS are likely to object. The preferred alignment in Section 3 also crosses the edge of the Mointeach nan Lochain Dubha SAC and SSI which is protected for fen, bog and loch habitats. The preferred alignment is south of the existing OHL, potentially placing the new line inside the protected area, although the intention to avoid direct impacts is noted. It is likely that indirect impacts so note that the preferred alignment has sought to
alignment for Section 4 has the potential to

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	result in significant effects on the special landscape qualities of the Knoydart NSA and the Kinlochhourn – Knoydart – Morar WLA. NS note that Variant 4H now crosses the road twice (near Loch Coire Shubh) rather than staying east and north of it for its duration. This would affect recreational users on the minor road to Kinloch Hourn, a popular route for tourists seeking a remote experience. Advice on the scope of the LVIA to inform assessment of such impacts is provided. NS note that the preferred alignment passes through or close to the Druim Losal and Quoich Spillway SSSIs, protected for geological interests. They recommend that siting of infrastructure is planned as to avoid direct impacts on the features of these sides so that rock faces and outcrops remain accessible and undamaged.	where possible, whilst also ensuring the constructability of the OHL in accordance with health and safety requirements and legislation. A further workshop was held with THC and NS during January 2022. At this workshop, SSEN Transmission explained the challenges associated with alignment options within this location, particularly with respect to terrain and proximity to Loch Coire Shubh, and the decision making process to arrive at the preferred alignment. This reasoning was generally accepted by THC and NS, albeit the sensitivities of this part of the route were highlighted. The proposed scope of the LVIA has been set out in the Scoping Report (December, 2021). Further consultation with NS on the scope of the LVIA will be undertaken, as required. It is considered the construction of the OHL could be achieved without likely significant effects on the notified features of these SSSI's, but this will be considered further in the EIA Report.
	Section 5 and 6: NS highlight that the preferred alignment at the far western part of Section 5 lies adjacent to the Kinlochhourn – Knoydart – Morar WLA, the effects on which should be considered. NS refer to the three NeSTS towers that have recently been built near Quoich dam. NS advise that the bulkier form of the NeSTS towers appears to be a prominent and more obvious structure, when viewed in combination with steel lattice towers. NS appreciate that this is a test site for NeSTS but suggest some exploration of design solution that might improve the transition between tower types. The preferred alignment within Sections 5 and 6 passes close to component parts of the West Inverness-shire Lochs SPA, which is protected for breeding common scoters and black-throated divers. There is potential	Comments in relation to NeSTS towers are noted. At this stage, the use of NeSTS is not proposed as part of the Skye Reinforcement Project, but their use on other parts of the network owned and operated by SSEN Transmission will continue to be considered. Comments in relation to the potential effects on the West Inverness-shire Lochs SPA are noted, and an assessment of the project on the qualifying features of this site will be considered during the EIA stage of the project, and as part of a HRA. Since publication of the Consultation Document ²⁷ , it is now proposed to extend the length of underground cable within Section 6, from a new cable sealing end compound near Loch Lundie (approximate grid reference 251139 805410) to Fort

²⁷ Skye Reinforcement Project: Consultation Document: Alignment Selection (September 2021), produced by SSEN Transmission



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	here for a significant effect from disturbance, displacement and collision risk, and a HRA will need to consider these issues. NS advise that the results of survey and assessment are used to inform the final alignment and design solution to minimise impacts on the SPA, and identify opportunities for mitigation (e.g. undergrounding). NS highlight that the common scoter population is very small and potentially in decline, so any impacts on them could be very significant. With respect to black-	Augustus Substation, a distance of approximately 9 km. SSEN Transmission have taken this decision to facilitate rationalisation of the electricity network in this area.
	throated divers, NS note the proximity of the preferred alignment to Loch Loyne, being constructed on the west side of the existing OHL and therefore somewhat closer to the loch in comparison. Advice on the scope of assessment work is provided.	
Scottish Environmental Protection Agency (SEPA)	No response received.	Previous consultation responses from SEPA remain relevant, with respect to consideration of flood risk, GWDTEs, peat depth, disturbance and re-use, and engineering activities which may have an adverse effect on the environment. These points have been considered during the alignment selection stage and will continue to be considered during the EIA stages of the project.
Historic Environment Scotland (HES)	General: In general, HES welcome that the historic environment has been a key consideration in the environmental factors considered during the alignment selection stage. HES has previously provided comments on alignment options to SSEN Transmission following preliminary workshops held during the alignment stage.	Comments received from HES following preliminary workshops have been considered during the alignment selection stage. During the preliminary consultation, HES requested additional wirelines from and to particular designated cultural heritage sites. On receipt of this information, HES concluded that the preferred alignment and design solution now presented was favourable to other variants with respect to potential setting effects on those designated sites.
	Section 0: HES main concerns relate to Trumpan Church (SM 949) and Dun Hallin broch (SM 916). Though, after reviewing the information provided for the preferred alignment, HES are content that the	With respect to these concerns, SSEN Transmission provided HES with wirelines to and from this SM of the preferred alignment and variant in this location. As noted, HES agreed that the preferred



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	preferred alignment would not have significant effects on these two scheduled monuments or other assets in the surrounding area.	alignment was the favourable option with respect to potential effects on the setting of this designated cultural heritage asset.
	Section 1: HES are satisfied that the preferred alignment would not have a significant impact on the setting of the scheduled monument, Dun Arkaig, broch (SM 13662) or other assets in HES' remit in the surrounding area.	HES's comments with respect to the preferred alignment and design solution in Section 1 are welcomed by SSEN Transmission.
	Section 2: HES noted the changes to the proposed design solution for this section of the project, including the use of UGC rather than OHL for a section of approximately 15 km. There are no assets within HES' remit in the vicinity of this section of the project and therefore, no detailed comments are provided.	HES's comments with respect to the preferred alignment and design solution in Section 2 are welcomed by SSEN Transmission.
	Section 3: HES welcome that the preferred alignment would move the OHL further away from Old Corry, cairns, but noted that it will be important that direct physical impacts on the scheduled area are avoided during construction of the new OHL and removal of the existing OHL following decommissioning. HES recommend that the precise legal scheduled area is marked as a constraint on any maps and that the area is physically marked out whenever works are taking place in the vicinity of the asset to ensure that accidental damage is avoided. HES suggest the intervening forestry should not be relied upon to provide screening as it is subject to felling, changing land management priorities, windblow, etc. Visualisations (wireframes may be most suitable as current forestry cover is not guaranteed long-term) showing outward views from the monument should be produced to demonstrate any resulting impacts and help inform mitigation such as location and micro-siting of towers. However, given the existing OHL which forms part of the baseline setting of this monument, HES are content that with	HES's comments with respect to the preferred alignment and design solution in Section 3 are welcomed by SSEN Transmission, and recommendations for avoidance of direct impacts will be incorporated into mitigation measures identified during the EIA stage of the project. Visualisations (wireframes) will be provided from this SM, and an assessment of effects as a result of the Proposed Development will be reported within the cultural heritage assessment of the EIA Report.



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	careful design the impacts on the setting of this monument are likely to be neutral.	
	Section 4: Following workshops held with statutory consultees at the alignment selection stage, HES identified that with careful design the OHL alignment presented at that time could have a neutral impact on the scheduled monuments in the vicinity of the project, with particular focus on Bernera Barracks (SM 950), Dun Telve and Dun Troddan, brochs, Glenelg (SM 90152 & PiC), and Dun Grugaig, dun, Gleann Beag (SM 914). HES also noted that, given the proximity of the access track to Dun Grugaig dun (SM 914) potential impacts from this aspect of the project needed to be carefully assessed. Whilst the preferred alignment would move the OHL closer to Bernera Barracks (SM 950) at the western extent of this section of the project, HES are content that, given the proximity to the existing OHL in that area, impacts on the setting of this monument will not be significantly increased and will likely be neutral.	The EIA stage of the project will include an assessment on the potential setting effects of the Proposed Development on the designated cultural heritage assets noted by HES in Section 4. As HES note, it is not anticipated that the preferred alignment would result in an adverse effect on setting to or from these assets. Where visibility is predicted, visualisations or wirelines will be prepared to demonstrate this visibility. The assessment will also consider the potential effects (direct and indirect) associated with construction and operational access.
	HES note that careful design of the preferred alignment should be undertaken in relation to the location of towers in the vicinity of the scheduled duns to avoid increasing adverse impacts on the setting of the monuments and if possible, reduce impacts. HES recommend that visualisations are provided looking from the monuments towards the proposed OHL in the EIA.	
	Section 5: There are no assets within HES remit in the vicinity of this section of the project and therefore HES have no detailed comments to offer.	It is acknowledged there are few cultural heritage designated sites within the vicinity of the Proposed Development in Section 5. Nevertheless, an assessment of the potential effects of the Proposed Development on cultural heritage will be undertaken during the EIA stage of the project.
	Section 6: HES concerns originally related to Torr Dhuin, fort, Fort Augustus (SM 794). HES note that the preferred alignment and design solution is now underground cable to rationalise electricity infrastructure in this	It is acknowledged that the undergrounding proposed within Section 6 to rationalise the electricity network in this area will mitigate any potential indirect

Stakeholder	Summary of Feedback	Response by SSEN Transmission
	area of the project. This would mitigate the effects of the project and would no longer present the same level of impact on the setting of the monument as compared to an OHL. HES are content that the preferred alignment will not have adverse impact on the setting of Torr Dhuin, fort, Fort Augustus (SM 794).	effects of an OHL solution on Torr Dhuin SM. An assessment of the potential effects of the Proposed Development on cultural heritage will be undertaken during the EIA stage of the project to assess the potential effects of undergrounding within this section on cultural heritage.
Forestry Land Scotland (FLS)	Forestry: FLS's main concern at present is the proposed route of the new OHL coming into Inchnacardoch / Auchterawe (Section 6). FLS referred to previous correspondence at the route option stage of the project (FLS letter of 30 March 2018) which confirms FLS's position in respect of any proposed new OHL through the National Forests and Land at Auchterawe. FLS state that they are disappointed that the current proposals still favour a new OHL adjacent to the existing OHL route, and they confirm that FLS will not endorse a further additional OHL into Auchterawe along this proposed route. They recommend that SSEN Transmission consider and promote an underground route so as to reduce the visual impact and be in the best interests of the local community and reduce the removal of woodland. FLS suggest they are willing to help facilitate an alternative route option within the National Forests and Land should there be a suitable location for it. In addition, FLS state they are aware of a number of separate utility/renewable projects all of which seek to take grid connections into Fort Augustus Substation. If these projects all progress without a wider strategic approach being taken, then FLS suggest the impact upon the National Forests and Land, as well as the Auchterawe community, will be significant. They suggest there is a need for an urgent strategic approach to the known future grid connections, and until this happens, FLS state that they are unwilling to endorse any further additional OHL's into Auchterawe.	SSEN Transmission acknowledge the comments and concerns raised by FLS with regard to additional overhead line infrastructure at Inchnacardoch and Auchterawe. Since publication of the Consultation Document ²⁸ , it is now proposed to extend the length of underground cable within Section 6, from a new cable sealing end compound near Loch Lundie (approximate grid reference 251139 805410) to Fort Augustus Substation, a distance of approximately 9 km (refer to Figure 1.6). SSEN Transmission have taken this decision to facilitate rationalisation of the electricity network in this area. SSEN Transmission will continue to engage with FLS on this project, and will keep FLS informed on strategies for future projects.

²⁸ Skye Reinforcement Project: Consultation Document: Alignment Selection (September 2021), produced by SSEN Transmission

Stakeholder	Summary of Feedback	Response by SSEN Transmission
Marine Scotland	Specifically in response to the consideration of subsea options within Sections 2 and 3 of the project, Marine Scotland suggested the views of other marine stakeholders were sought to provide advice on the conclusions reached. ²⁹	SSEN Transmission also sought the views of other marine stakeholders, including the Marine Coastguard Agency and the Ministry of Defence. No particular comments were made from these organisations with respect to the conclusions of the study into subsea options for Sections 2 and 3 of the project.
Non – Statutory	Consultees	
International Otter Survival Fund	The International Otter Survival Fund queried the potential impact on otters within Section 3 given the change in alignment now follows the coast and so has potential for having a serious impact on otters. They also note that there are a number of other areas which would need to be checked for otters. The International Otter Survival Fund asked if surveys have been done for otters and if so is it possible to see a copy of the results.	It is acknowledged that otter are a qualifying feature of the Kinloch and Kyleakin Hills SAC and SSSI, through which the preferred alignment passes, and are known to be present in other areas throughout the route. Otter survey data collected within the SAC over several years has shown that otter is commonplace within the area with a high volume of otter field signs recorded, along with numerous protected features such as holts and resting up areas (couches). The majority of otter signs and all protected features for otter are generally restricted to the coastline, or within 50 m of it. Given that the preferred alignment is generally well set-back from the coastline, and with much naturally screening woodland and vegetation in-between, and a lack of suitable foraging habitat inland at this location, interfaces with otter are expected to be minimal within the SAC. Potential effects on otter within the SAC (and across the rest of the project) will be assessed during the EIA stage of the project (and as part of the HRA for the SAC). SSEN Transmission are willing to share relevant survey data with the International
		Otter Survival Fund.
John Muir Trust	Landscape and Visual, including Landscape Designations: John Muir Trust states that in Section 2, it is clear, from the undergrounding of the line as it passes the	SSEN Transmission welcome the support from John Muir Trust with regard to undergrounding part of the line within Section 2. Opportunities to mitigate the

²⁹ As summarised within the Skye Reinforcement Project Consultation Document: Alignment Selection (September 2021).



Stakeholder **Summary of Feedback** Response by SSEN Transmission Cuillin Hills NSA, that SSEN Transmission potential landscape and visual effect of the listened to stakeholder feedback, so John cable sealing end compounds will be Muir Trust thanks SSEN Transmission for considered during the EIA stage of the that. John Muir Trust have noted the need project. for above-ground sealing end compounds at With respect to comments made in Section either end of undergrounded sections and 4, consideration will also be given here to that siting these can result in landscape and mitigate landscape and visual effects visual impacts depending on where they are. where practicable. The proposed scope of John Muir Trust suggest SSEN the EIA Report has been set out in the Transmission could screening such as Scoping Report (December 2021). Within native woodland planting or allowing natural the Scoping Report, it is stated that given regeneration to minimise impacts. The sites the presence of the existing OHL to be for planting native woodland however need replaced through most of this section, it is to be assessed as suitable for planting. considered that a full Wild Land For Section 4, through the northern part of Assessment within Section 4 will not be the Kinlochhourn-Knoydart-Morar WLA to required. However, a review of the the north-west of Loch Hourn along the Proposed Development with respect to the route of the existing OHL, John Muir Trust Key Qualities of WLA 18. Kinlochhourn-questioned if SSEN Transmission will Knoydart - Morar will be included in the consider any options for screening the visual LVIA. impact of the steel lattice structures, and if SSEN Transmission will complete a Wild Land Impact Assessment for this section. Access: John Muir Trust suggest it would Detailed information relating to the cable have been helpful to have seen a map route and construction access are still showing the additional fencing along the being developed but will be provided at the cable and any additional tracks required, EIA stage of the project. The construction given a fenced cable line around the John phase would require elements of the cable Muir Trust's Sconser property could be a construction corridor to be fenced in line barrier to accessing the property for their with health and safety requirements. land team and for the local graziers and However, this would be during the visitors. John Muir Trust have been construction phase only and fencing would reassured by SSEN Transmission that these be removed once construction works are conversations will follow and look forward to completed. Limited and discrete fencing this. John Muir Trust also suggest it would may be required at joint bay locations have been helpful to have more along the cable route. interpretation of how access to popular A Draft Outdoor Access Plan will be mountain routes will be maintained during included with the EIA Report to describe construction and whether routes will remain how access to walking and other the same after construction has concluded. recreational routes would be managed during the construction stage. It is anticipated that access to existing recreational routes will be maintained during the construction phase, subject to appropriate measures to ensure the safety

of members of the public. Where this is not



Stakeholder	Summary of Feedback	Response by SSEN Transmission
		possible, alternative access will be provided.
	Mitigation and Habitat Restoration: John Muir Trust are happy to be contacted to discuss any mitigation plans and habitat restoration plans that SSEN Transmission are developing for along the route.	SSEN Transmission will develop a detailed restoration plan and will be happy to consult with JMT and others once available
	Carbon Emissions: John Muir Trust welcome the undergrounding of the cable for part of Section 2, but they suggest that this mitigation raises questions about carbon costs from peaty soils. John Muir Trust suggest they would expect the carbon emissions associated with groundwork preparation, installation and operation of each section of the OHL to have been considered and for SSEN Transmission to be seeking to reduce emissions wherever possible, including a mitigation plan to keep carbon emissions to a minimum.	SSEN Transmission will seek to minimise disruption of peatland habitats and the release of carbon from peat soils during installation of the underground cable, and other parts of the route where relevant. This will be informed by peat depth data collected for the project, and managed through a Peat Management Plan, a draft of which will be provided within the EIA Report.
	BNG: John Muir Trust encourage SSEN Transmission to consider the different methods for laying cables and to choose the option that will support better long term outcomes for biodiversity and the land's recovery. They suggest opting to run the cables through a duct inserted into a trench which could enable faster reinstatement (and therefore faster recovery of habitats) rather than opting to dig a trench, lay cables and pack special material or aggregate around them before reinstating the trench. They suggest the reinstatement of temporary tracks and re-use of existing tracks will be a way to reduce the ecological harm of this development. John Muir Trust would welcome more information on everything SSEN Transmission are going to do to minimise the carbon and environmental costs of this development for each section of the line.	An underground cable solution for this project would comprise a double circuit, with a cable rating required to match the corresponding OHL at 348 Mega Volt Amps (MVA). Installation of an underground cable would typically require a wide construction corridor (approximately 30 to 40 m) to accommodate excavation and cable installation equipment. A construction haul road would be required for much of the cable installation route. After construction, disturbed ground can be reinstated and restored. To facilitate a more efficient installation cables would be installed via ducts, laid in an open cut trench. These plastic ducts would be installed prior to the cable pull job to minimise open ground works / excavations. Crossings of watercourses over 2 metres wide are likely to be performed using Horizontal Direct Drill (HDD) where

Stakeholder	Summary of Feedback	Response by SSEN Transmission
		Further information on the methods that are likely to be adopted for laying underground cable will be provided within the EIA Report. A detailed restoration plan will also be developed.
JRC Ltd.	Interference with radio systems: To fully assess the impact of the Proposed Development to interfere with radio systems, JRC outlined that they would require the coordinates and heights of any pole or tower structures.	SSEN Transmission will provide this information to JRC once available.
Mountaineering Scotland	Landscape and Visual, including Landscape Designations: Mountaineering Scotland noted that the Proposed Development follows the existing 132 kV OHL closely through the National Scenic Area and Wild Land Area (in Section 4). In Mountaineering Scotland's view, this is the least damaging option, and they have no further comment on the alignment of the route at this time.	This comment, and support for the preferred route in Section 4, is noted.
	Access: Mountaineering Scotland request the width of permanent access tracks is confirmed, along with the finish of the track, and that a central strip would be grassed over to allow it to blend quicker into the landscape.	The width and finish of access tracks will be stated within the EIA Report. It is anticipated that permanent tracks would be reduced to approximately 2.5 m in width.
Transport Scotland	Access: Transport Scotland highlight that any proposed works at, or changes to, the trunk road network must be discussed and approved by the appropriate Transport Scotland Area Manager.	Consultation with Transport Scotland will be undertaken as the design and EIA progress.
	Traffic, HGVs and Abnormal loads: Given the scale of the project, Transport Scotland would consider that the number of HGVs involved in the construction could potentially have traffic and associated environmental impacts on the trunk road network. Transport Scotland will require an assessment of the number of loads generated during the construction stage. This should include an assessment of environmental impacts such as driver delay, pedestrian amenity, severance, safety etc,	Where the relevant thresholds ³⁰ are exceeded, an assessment will be provided as part of the EIA Report to include the likely number of construction traffic movements and the capacity of local roads to accommodate construction traffic, with reference to the potential effects of severance; fear and intimidation; accidents and safety; driver delay; pedestrian amenity; and pedestrian delay. A Construction Traffic Management Plan (CTMP) would be developed to ensure

 $^{^{}m 30}$ As noted in the IEMA Guidelines for the Environmental Assessment of Road Traffic (1993)



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	using the Institute of Environmental Management and Assessment Guidelines. These specify that road links should be taken forward for assessment if:	road safety for all other road users during construction works, and for suitable management of any abnormal loads involved, if required.
	Traffic flows will increase by more than 30%, or	
	The number of HGVs will increase by more than 30%, or	
	Traffic flows will increase by 10% or more in sensitive areas.	
	Transport Scotland is satisfied that no further assessment is required if the above thresholds are not exceeded.	
	It is not clear to Transport Scotland whether any abnormal load deliveries will be required during the construction period. A full Abnormal Loads Assessment report should be provided that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.	
Woodland Trust Scotland	Ancient Woodland: The Woodland Trust Scotland have stated that they strongly oppose the alignment of the Proposed Development on the basis of potential damage and loss to a number of woodlands designated on the Ancient Woodland Inventory (AWI). The Woodland Trust believe that ancient woodland, including semi-natural ancient woodland, is amongst the most precious and biodiverse habitats in the UK and is a finite resource which should be protected. They suggest that the removal of woodland is contrary to two important pieces of Scottish Government policy, the Scottish Planning Policy (SPP) and the Control of Woodland Removal Policy. Based on their assessment, Woodland Trust Scotland state that at least 20 ancient woodlands will be within the path of the Proposed Development, which is likely to lead to direct loss and removal of	The preferred alignment has sought to minimise impacts on ancient woodland wherever possible. Confirmation of woodland loss as a result of the Proposed Development will be provided and assessed within the EIA Report, with appropriate measures put in place to mitigation where possible, or compensate for any woodland loss.



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	Woodland Trust Scotland are particularly concerned regarding direct loss of ancient woodland, impacts of noise and dust pollution, fragmentation of semi-natural habitats, trampling of associated habitats and the creation of wayleave corridors through woodland.	
RSPB	Section 1: RSPB consider the preferred alignment within Section 1 would have serious adverse impacts on two white-tailed eagle territories, one golden eagle territory, two hen harrier territories, numerous immature white-tailed eagles who use Mugeary forest as a preferred sheltered roost site, breeding curlew, greenshank and golden plover. The route travels through active blanket bog on Skye, with peat depths up to 4 m and more, which could be impacted by hydrology changes caused by the construction of stone access roads. RSPB suggests that Section 1 be undergrounded along Route Variants 1C and 1A in order to minimise effects on habitats and peatland, and minimise impacts on the listed conservation species, as well as reduce the landscape and visual effects cited as reasoning to use the preferred alignment.	As noted in the Consultation Document: Alignment Selection (September 2021), moorland breeding bird surveys, flight activity surveys for white-tailed eagle and golden eagle, and searches for nest sites have been undertaken throughout 2021, to supplement existing data and inform alignment selection within Section 1. Ornithological sensitivities throughout Section 1 are noted, but SSEN Transmission and their ornithological advisers believe an OHL can be achieved without significant adverse effects on ornithology, subject to further assessment through the EIA process, and the implementation of appropriate mitigation measures. Peat probing surveys have been undertaken to inform the siting of tower positions, and a peat management plan will be developed as part of the EIA Report. The disruption to peatlands and areas of deeper peat will be minimised as
	Section 3: RSPB wish to reiterate serious concern over Route Option 3B through Glen Arroch, as it presents on-going long-term negative impacts for several Schedule 1 and Annex 1 species including white-tailed eagle, golden eagle and hen harrier. They refer to their full comments in their response to the Routing Consultation Report in August 2020. Section 5: RSPB have substantial concerns regarding the OHL construction between Loch Garry and Loch Loyne. The new higher lines may potentially impact common scoters and black-throated divers (both qualifying features of the SPA) commuting between different parts of the SPA, creating serious collision issues for common scoters	far as practicable. The project will not seek to extend the areas of proposed undergrounding over and above the areas proposed (i.e. in Section 2 and 6 of the project) identified, or at any other sections of the overhead line. Installing large sections of underground cable on the network not only comes at a significant additional cost, 2-3 times the cost of overhead solutions, but also creates network performance issues that need to be addressed using specific technical and engineering solutions. Due to the lengths of cable proposed on the Skye Reinforcement Project at present, approximately 24 km of the 160 km OHL, large reactive compensatory equipment is



Stakeholder	Summary of Feedback	Response by SSEN Transmission
	who migrate and move across between the lochs at night. Therefore, the RSPB strongly advise undergrounding of this section, and note the intensive recovery plan, designed to prevent their extinction, which includes NatureScot, SSE Renewables, and Forest and Land Scotland alongside the RSPB. A negative pressure on this work such as new collision risks could negate it.	needed at both Broadford and Edinbane substations to rebalance the system issues created by the cable in order to allow operation of the transmission network in compliance with the required codes and standards. This has meant that the size of these substation sites has had to increase substantially to accommodate the footprints of the necessary additional equipment. Any extension to the proposed cable lengths would require further system studies to assess the feasibility of the system to remain compliant and operate properly under this scenario, and if feasible would lead to further increases in the size of the substation sites to accommodate the greater footprint of larger and additional equipment needed to run the network accordingly, as well as substantially increasing the cost of delivering the
		Concerns stated with respect to Route Option 3B (Glen Arroch) are noted, and were a factor in the decision to choose Route Option 3A as the preferred route. Comments in relation to Section 5 are also noted and will be considered during the EIA stage of the project. As noted above, there are no plans to underground this part of the line.



6. COMMUNITY RESPONSES

6.1 Summary of Feedback

6.1.1 Table 6.1 sets out the feedback on a section by section basis received by the local community, landowners, general public and community groups following the consultation period (September 2021 to January 2022), including comments received during the consultation events. Responses by SSEN Transmission are also included, setting out the action to be taken where relevant.

Table 6.1: Public and Local Community Consultation Comments

Feedback Comments	Response by SSEN Transmission
Section 0: Ardmore to Edinbane	
There were no specific written responses received for Section 0. Feedback received at consultation events was generally positive and supportive of the project, and preferred alignment and design solution in this section.	No response required.

Section 1: Edinbane to North of Sligachan

Five written responses were received citing similar concerns with the preferred alignment and design solution in Section 1. These included concerns with respect to the potential impact and disruption to golden eagle and white tailed eagle, in particular a white tailed eagle nest near Mugeary. Responders noted that the glen in general is a hunting ground for these species (Curlew also present).

Responses also noted the visual impact of steel lattice towers through this section, particularly from properties at Glenmore and Mugeary, and queried whether undergrounding the OHL here would be considered.

As noted in the Consultation Document: Alignment Selection (September 2021), moorland breeding bird surveys, flight activity surveys for white-tailed eagle and golden eagle, and searches for nest sites have been undertaken throughout 2021, to supplement existing data and inform alignment selection within Section 1.

Ornithological sensitivities throughout Section 1 are noted, but SSEN Transmission and their ornithological advisers believe an OHL can be achieved without significant adverse effects on ornithology, subject to further assessment through the EIA process, and the implementation of appropriate mitigation measures.

A steel lattice OHL is required within Section 1 to meet the capacity requirements from renewable generation on Skye.

The preferred alignment, situated along the edge of the forest, has been selected to minimise potential significant visual effects from receptors at Glenmore and Mugeary, given the distance and the backcloth effect of the forest, despite being in the main view.

An underground cable route through this section would require substantial expansion to Edinbane and Broadford Substations and a significant cost increase for the project as a whole. SSEN Transmission need to balance



Feedback Comments	Response by SSEN Transmission
	cost, technical and environmental factors when developing a project, and believe this has been achieved with the current alignment and design solution within Section 1. Further details of additional undergrounding constraints are noted in the RSPB response in Table 5.1.
Section 2: North of Sligachan to Broadford	
There was a positive response from attendees at consultation events with respect to the proposed undergrounding of approximately 15 km of the OHL through Section 2. This is also reflected in written responses from members of the community to SSEN Transmission.	SSEN Transmission welcomed the support shown for undergrounding within Section 2. This decision has been taken to mitigate likely significant landscape and visual effects of an OHL through this sensitive area.
One responder strongly supports the undergrounding within Section 2 but is concerned that more consideration needs to be given to the visual impact of steel lattice towers between Broadford and the start of the underground section at Luib. The current wood pole is already having a visual impact as it rises above Broadford and skirts the edge of the Red Cuillin Hills. This is made worse by recent and ongoing felling in the area which is making the power lines even more visible due to the removal of tree cover. The responder is looking for an explanation as to why the undergrounding plan does not extend further along section 2 to include all of the Cuillin Hills NSA, and believes the undergrounding should go all the way to Broadford.	SSEN Transmission need to balance cost, technical and environmental factors when developing a project. The undergrounding of approximately 15 km through Section 2 has been done to minimise significant landscape and visual effects, and has been focussed on the particularly sensitive areas within the NSA. Extending the length of underground cable to Broadford would increase the cost of the project considerably, as well as the requirements for reactive compensation at Broadford Substation. Further details of additional undergrounding constraints are noted in the RSPB response in Table 5.1.
One response suggested a permanent shelter-belt of forestry should be included as part of the proposed extension to Broadford Substation to shield the development from view.	The extension of Broadford Substation is subject to a separate planning consent. Nevertheless, SSEN Transmission will be considering landscape mitigation measures as part of that project.

Section 3: Broadford to Kyle Rhea

A letter prepared on behalf of the local community at Kylerhea was provided to the Energy Consents Unit of the Scottish Government, copied to SSEN Transmission, stating the unanimous support of the local community for Route Option 3A, within which the preferred alignment is located, thereby avoiding the requirement for a new powerline through Glen Arroch and Kylerhea (Route Option 3B). The community have gathered a 3000-signature petition against Route Option 3B.

SSEN Transmission recognises the significant level of support from the local community toward Route Option 3A, as opposed to Route Option 3B (Glen Arroch). The potential impact of an OHL on the community, and landscape and visual receptors through this sensitive landscape, has been a key reason in the decision to route the preferred alignment within Route Option 3A. However, whilst a preferred alignment and design solution has been identified, an alternative option via Glen



Feedback Comments	Response by SSEN Transmission
	Arroch has not been ruled out at this stage given the sensitivities of the Kinloch and Kyleakin Hills SAC / SSSI, crossed by both options. As such, both options continue to be assessed through the EIA stage of the project until a final decision has been made prior to the section 37 application being submitted. This decision will be informed through the Habitats Regulation Appraisal and EIA process.
There was an overwhelming positive response from attendees at consultation events with respect to the preferred alignment being routed within Route Option 3A.	SSEN Transmission acknowledges the support shown for the preferred alignment by the local community. As noted above, both options continue to be assessed through the EIA stage of the project until a final decision has been made prior to the section 37 application being submitted. This decision will be informed through the Habitats Regulation Appraisal and EIA process.
A number of written responses were received directly by SSEN Transmission from members of the local community, citing their strong support for Route Option 3A over Route Option 3B. A summary of these responses is included below: Support for Route Option 3A to preserve the natural beauty of the area (along Route Option 3B) as well as avoid a detrimental effect on their village's quality of life (Kylerhea). One response notes its support of Route Option 3A to balance the "need to safeguard the historic crofting community at Kylerhea and its beautiful unspoilt terrain." Another responder states that Glen Arroch "is a special place, the Kyle Rhea crossing being the original route from Edinburgh to the outer isles," and that "the ancient drove road and its associated listed buildings are an important part of Scotland's cultural and engineering history," being "of national significance." They mention the area's significance as the ancient ferry crossing "over the sea to Skye," is an internationally famous route. Another response notes this approach across Kyle Rhea as 'the single most dramatic entry to Skye'. A response noted that the 1970's transmission route was able to avoid the Glen Arroch area at the final approval stage, and so this new project should also be able to do so. The responder feels that, considering the additional effort put in to undergrounding parts of Section 2 to address landscape and visual concerns and sidestepping ancient woodland, the same could be done for Kylerhea.	SSEN Transmission acknowledges these responses from the local community. The potential impact of an OHL on the community, and landscape and visual receptors through this sensitive landscape and environment, has been a key reason in the decision to route the preferred alignment within Route Option 3A. However, whilst a preferred alignment and design solution has been identified, an alternative option via Glen Arroch has not been ruled out at this stage given the sensitivities of the Kinloch and Kyleakin Hills SAC / SSSI, crossed by both options. As such, both options continue to be assessed through the EIA stage of the project until a final decision has been made prior to the section 37 application being submitted. This decision will be informed through the Habitats Regulation Appraisal and EIA process.



Feedback Comments	Response by SSEN Transmission
A response strongly supporting Route Option 3A notes their personal experience spending time in Glen Arroch, and that the alternative Route Option 3B (Glen Arroch) would have a devastating effect on this sensitive area and to the wildlife living there if chosen.	
A response believes that the preferred alignment between Kyle Rhea Narrows and Broadford finds the right balance between considering human and natural habitats, ensuring that "this important gateway to Skye" keeps its natural beauty and avoids compromising wildlife or human wellbeing.	
A responder, preferring Route Option 3A, is concerned that Route Option 3B is still a possibility, and worries about "significant adverse effects on the health and wellbeing of the Kylerhea community" as well as the Class 1 peat bog nearby.	
A response notes a "possible 18th-C military lookout building recorded on Highland HER at https://her.highland.gov.uk/Monument/MHG31003. This may be associated with government troops stationed at Kinloch Hourn post-Culloden." The responder would like to see it ensured that this site won't be disturbed by access track or tower construction.	This comment is noted. The Proposed Development will be subject to a detailed assessment of potential impacts on cultural heritage, and appropriate mitigation measures put in place to ensure impacts are avoided, or minimised.
Some responses in favour of Route Option 3A express an additional desire that the OHL be sited high up the hillside as to avoid sessile oaks and blanket bog in the area.	The preferred alignment and design solution has been situated to minimise impacts of old sessile oaks and blanket bog as far as practicable.
The Kyleakin & Kylerhea Community Council are pleased that Route Option 3A is considered the preferred route as they are concerned about the negative impact on the local community that Route Option 3B would have if implemented.	SSEN Transmission acknowledges this comment from the Community Council. The potential impact of an OHL on the community, and landscape and visual receptors through this sensitive landscape, has been a key reason in the decision to route the preferred alignment and design solution within Route Option 3A. However, whilst a preferred alignment and design solution has been identified, an alternative option via Glen Arroch has not been ruled out at this stage given the sensitivities of the Kinloch and Kyleakin Hills SAC / SSSI, crossed by both options. As such, both options continue to be assessed through the EIA stage of the project until a final decision has been made prior to the section 37 application being submitted. This decision will be informed through the Habitats Regulation Appraisal and EIA process.



Feedback Comments

The Kylerhea Community Forum state their preference for Route Option 3A being considered the preferred route over Route Option 3B, as they have similar concerns to the Community Council regarding the negative impact the latter could cause.

Response by SSEN Transmission

SSEN Transmission acknowledges this comment from the Kylerhea Community Forum. The potential impact of an OHL on the community, and landscape and visual receptors through this sensitive landscape, has been a key reason in the decision to route the preferred alignment within Route Option 3A. However, whilst a preferred alignment and design solution has been identified, an alternative option via Glen Arroch has not been ruled out at this stage given the sensitivities of the Kinloch and Kyleakin Hills SAC / SSSI, crossed by both options. As such, both options continue to be assessed through the EIA stage of the project until a final decision has been made prior to the section 37 application being submitted. This decision will be informed through the Habitats Regulation Appraisal and EIA process.

Section 4: Kyle Rhea to Loch Cuaich

A response objects to the preferred alignment through Loch Coire Shubh and its likely impact on this dramatic landscape, noted by its designation as a National Scenic Area and one of the few remaining non-industrial parts of Glengarry land, and an important 19th Century cultural landscape popular with visitors and locals alike. The responder also notes that the existing OHL is fairly inconspicuous, makes use of natural features for concealment, and the presence of existing tracks, still visible up the hillside.

Two similar responses focus more on the "breathtaking dive down to Kinloch Hourn," considering this natural area one of the most beautiful in the country; a "wild place which merits protection for future generations." One of the responders notes that the existing pylons don't impact this, but feel that the planned diversion in the new route will be devastating.

Kinloch Hourn Estate consider it important to rethink the alignment at Loch Coire Shubh and hopes this is something SSEN are prepared to re-assess, and be able to offer a "better solution for the wider public's benefit".

A responder would like to see the current power lines at Ca Mhor, west of Kinloch Hourn, be prioritised for remediation The preferred alignment and design solution within the vicinity of Loch Coire Shubh has sought to minimise landscape and visual impacts where possible, whilst also ensuring the constructability of the OHL in accordance with health and safety requirements and legislation.

As noted in the Consultation Document: Alignment Selection (September 2021), options to the east of Loch Coire Shubh (where the existing OHL is located) were ruled out on technical grounds due to steep, and / or wet ground, rocky outcrops and extremely challenging construction access. This meant that options were restricted to the east side of the minor road, across flatter ground to the west of Loch Coire Shubh, or to the west of the minor road. It was considered that the option to the west of the minor road (i.e. the preferred alignment) moved the OHL away from the lochs as much as possible and allowed the visual connection between the road and the lochs to be less impeded than the option to the east of the road.

The existing OHL would be dismantled upon completion and energisation of the new OHL.



Feedback Comments	Response by SSEN Transmission
post project-completion as they are particularly visually prominent.	At this stage, it is not possible to confirm the sequencing of dismantling works.
Section 5: Loch Cuaich to Invergarry	
There were no specific written responses received for Section 5.	No response required.
Section 6: Invergarry to Fort Augustus	
A responder would like to see the section of the line that moves past their house undergrounded. They say this would leave additional space at the back of Auchterawe for the upcoming Coire Glas line.	It is now proposed to underground approximately 9 km of the OHL within Section 6.
Other Points	
One response asked for justification from SSEN Transmission as to the colour of the steel lattice (a metallic silver/grey colour), as they believe the current wood pole (from Broadford to Ardmore) is at least less distinct when viewed from a distance, and the recolouring of the steel lattice to a green or brown colour might reduce visual impact.	Steel lattice towers have a galvanised steel finish which is mid-grey in colour. Although the initially shiny appearance can stand out more obviously within the landscape this quickly dulls to a matt finish. Although a green or brown colour may appear to "camouflage" towers within a certain view, when moving through the landscape, these colours can increase the prominence of towers in other views with difference backdrops, such as the sea or sky, or at different times of the year when colours in the landscape change. Painting towers would also lead to an additional maintenance requirement. The matt grey finish and tone of the galvanised steel is considered to work well within a range of backdrops including darker tones of the landscape and the lighter colours of the sky and it is not considered that changing the colours of towers would lead to any very noticeable improvement which would merit the additional maintenance.
One response takes issue with the electricity supply surcharge in the Highlands and Islands, despite the north providing much energy in terms of oil, gas and renewables to the south. The tariff is contributing to fuel poverty in the area.	This is not within the remit of this project.
One responder is concerned about the increased emissions of the construction process and the potential for subsequent biodiversity loss.	A BNG Report setting out the assessment of biodiversity impacts and proposals for biodiversity enhancement will be undertaken during the EIA stage of the project. The aim o BNG is to minimise the ecological impacts and



Feedback Comments	Response by SSEN Transmission
	provide opportunities for enhancing biodiversity.
A responder is concerned about the re-use of some existing aged infrastructure. They also want to know if seabed routing has been fully explored and financially evaluated. They do believe upgrades are needed.	This project will replace existing OHL infrastructure. Options to route part of this project by subsea cables has been explored but discounted, as set on in the Consultation Document: Alignment Selection (September 2021).
A responder would like the structures to be as discreet as possible and follow the old lines.	For the majority of the route, the Proposed Development follows the route of the existing OHL closely.
A resident of Skye is worried about how the new power lines will affect the natural beauty of the isle, its wildlife, the health implications of living close to the lines, and the potential damage to their property value. They would like to see undergrounding considered.	Undergrounding is proposed to minimise likely significant landscape and visual effects within Section 2 of the project, between Sligachan and Luib. In other parts, the alignment selection process undertaken has sought to minimise other environmental effects, including proximity to properties, as far as practicable.



7. PROJECT RESPONSES TO CONSULTATIONS

7.1 Overview

7.1.1 This part of the Report on Consultation documents how the project team has considered the consultation responses received between September 2021 and January 2022 following publication of the preferred alignment and design solution as described within the Skye Reinforcement Project Consultation Document: Alignment Selection (September 2021), and during consultation events. Confirmation of the proposed alignment and design solution is also provided.

7.2 Summary of Responses and Progression to the EIA Stage

Section 0

- 7.2.1 Responses received from statutory and non-statutory consultees provided general support for the preferred alignment and design solution identified, subject to further review of the detailed assessment to be provided in the EIA Report. NS noted that the preferred alignment passes through the An Cleiach SSSI, protected for geological interests, and recommended that the siting of infrastructure is planned as to avoid direct impacts on the features of these sides so that rock faces and outcrops remain accessible and undamaged.
- 7.2.2 There were no particular queries raised in written responses from the local community with respect to the preferred alignment and design solution in this section of the project.
- 7.2.3 Whilst the preferred alignment and design solution will be considered further during the EIA stage of the project, and further refinement may be proposed, on balance it is considered that the preferred alignment and design solution in this section is taken forward as the proposed alignment and design solution.

- 7.2.4 NS noted proximity to the nearby Sligachan Peatlands SSSI and SAC, and the requirement for mitigation, as well as ornithological sensitivities, both north of the B885 and close to the Mugeary/Tungadal Forest. From an ornithology perspective, NS suggests it may be preferable to use an alignment either closer to, or east of, the existing OHL. However, that decision should be informed by further ornithological data, and the consideration of other aspects (e.g. landscape and peat).
- 7.2.5 RSPB noted that the preferred alignment and design solution would have serious adverse impacts on two white-tailed eagle territories, one golden eagle territory, two hen harrier territories, numerous immature white-tailed eagles, breeding curlew, greenshank and golden plover. RSPB also note that the preferred alignment travels through active blanket bog, with peat depths up to 4 m and more, which could be impacted by hydrology changes caused by the construction of stone access roads. RSPB suggest that Section 1 be undergrounded along Route Variants 1C and 1A in order to minimise effects on ornithology. habitats and peatland, as well as reduce the landscape and visual effects cited as reasoning to use the preferred alignment.
- 7.2.6 No particular concerns were raised by other statutory and non-statutory consultees with respect to the preferred alignment and design solution in Section 1, subject to further review of the detailed assessment to be provided in the EIA Report.
- 7.2.7 Comments received from the local community in relation to Section 1 focused on the potential impact and disruption to golden eagle and white-tailed eagle, in particular a white tailed eagle nest near Mugeary. Furthermore, responses also noted the visual impact of steel lattice towers through this section, particularly from properties at Glenmore and Mugeary, and queried whether undergrounding the OHL here would be considered.



- 7.2.8 In response to the comments made, SSEN Transmission would highlight that moorland breeding bird surveys, flight activity surveys for white-tailed eagle and golden eagle, and searches for nest sites have been undertaken throughout 2021, to supplement existing data and inform alignment selection within Section 1. The ornithological sensitivities throughout Section 1 are noted, but SSEN Transmission and their ornithological advisers believe an OHL can be achieved without significant adverse effects on ornithology, subject to further assessment through the EIA process, and the implementation of appropriate mitigation measures. Furthermore, the preferred alignment, situated along the edge of the forest, has been selected to minimise potential significant visual effects from receptors at Glenmore and Mugeary, given the distance and the backcloth effect of the forest, despite being in the main view. Peat probing surveys have also been undertaken to inform the siting of tower positions and minimise disruption to peatlands as far as practicable.
- 7.2.9 The project will not seek to extend the areas of proposed undergrounding over and above the areas proposed (i.e., within Sections 2 and 6 of the project), or at any other sections of the overhead line. Installing large sections of underground cable on the network not only comes at a significant additional cost, 2-3 times the cost of overhead solutions, but also creates network performance issues that need to be addressed using specific technical and engineering solutions. Due to the lengths of cable proposed on the Skye Reinforcement Project at present, approximately 24 km of the 160 km OHL, large reactive compensatory equipment is needed at both Broadford and Edinbane substations to rebalance the system issues created by the cable in order to allow operation of the transmission network in compliance with the required codes and standards. This has meant that the size of these substation sites has had to increase substantially to accommodate the footprints of the necessary additional equipment. Any extension to the proposed cable lengths would require further system studies to assess the feasibility of the system to remain compliant and operate properly under this scenario, and if feasible would lead to further increases in the size of the substation sites to accommodate the greater footprint of larger and additional equipment needed to run the network accordingly, as well as substantially increasing the cost of delivering the project.
- 7.2.10 SSEN Transmission need to balance cost, technical and environmental factors when developing a project, and believe this has been achieved with the current alignment and design solution within Section 1. As such, and subject to further review and assessment through the EIA stage of the project, SSEN Transmission propose that, on balance, the preferred alignment and design solution in this section is taken forward as the proposed alignment and design solution.

- 7.2.11 Responses received from statutory and non-statutory consultees provided general support for the preferred alignment and design solution identified, in particular the decision to underground approximately 15 km of the OHL through the Cuillins NSA. Nevertheless, THC, NS and other consultees did highlight the potential for significant environmental effects as a result of the construction of an underground cable through this section, and the requirement for suitable mitigation measures to ensure the success of this solution. THC also noted the proposed undergrounding does not cover the entirety of the proposed route in Section 2 through the NSA, with the southern end of this cable to be an OHL, albeit they are satisfied that this may be appropriate should it be suitably screened from intervening topography and not having a skylining effect which would detrimentally detract from views towards the distinctive Cuillin Hills' summits. NS also highlighted the sensitivities associated with proximity to the Cuillin Hills SPA.
- 7.2.12 There was a positive response from the local community with respect to the proposed undergrounding of approximately 15 km of the OHL through Section 2. One responder who strongly supports the undergrounding within Section 2 suggests more consideration needs to be given to the visual impact of steel lattice towers between Broadford and the start of the underground section at Luib.
- 7.2.13 SSEN Transmission welcome the support shown for undergrounding approximately 15 km of the OHL within Section 2. This decision has been taken to mitigate likely significant landscape and visual effects of an OHL through this sensitive area. Nevertheless, it is recognised that challenges and sensitivities existing with



installing an underground cable within this area, and this will be subject to further review through the EIA stage of the project.

- 7.2.14 With respect to extending the length of the underground cable to Broadford, SSEN Transmission need to balance cost, technical and environmental factors when developing a project. The undergrounding of approximately 15 km through Section 2 has been done to minimise significant landscape and visual effects, and has been focussed on the particularly sensitive areas within the NSA. Extending the length of underground cable to Broadford would increase the cost of the project considerably, as well as the requirements for reactive compensation at Broadford Substation. This is referred to in paragraph 7.2.10 of this Chapter.
- 7.2.15 As such, and subject to further review and assessment through the EIA stage of the project, SSEN Transmission propose that, on balance, the preferred alignment and design solution in this section is taken forward as the proposed alignment and design solution.

- 7.2.16 There were contrasting views expressed by statutory and non-statutory consultees in this section.
- 7.2.17 NS continue to advise that a new OHL within the currently proposed route has the potential to adversely affect the Kinloch and Kyleakin Hills SAC and SSSI. NS advise that all options continue to be kept open for consideration. NS also advise that the final route decision needs to be weighted according to the legislative and policy context. NS believe that Route Option 3B would traverse the lesser amount of the most sensitive habitats (blanket bog and broadleaved woodlands) in the SAC, and result in less damage to the SAC. This view is not final, however, and is subject to further information being provided.
- 7.2.18 THC note that both route options would cross the Kinloch and Kyleakin Hills SAC / SSSI and could result in an adverse effect on site integrity, whilst also giving rise to likely significant landscape and visual effects. THC note that for Route Option 3A (the preferred alignment) there is already the presence of the existing line in the view, and whilst the preferred alignment would be at a higher elevation, it should not be skylining and its visibility could potentially be mitigated by further woodland planting. In contrast, should Route Option 3B be selected, this would introduce new visibility for Kylerhea and from the mainland settlements of Glenelg as well as from the small ferry crossing, with construction of the line here also requiring tree felling. Nevertheless, THC suggests that in Section 3 weight in the decision-making process should be attributed to the European importance of the protected habitats of the Kinloch and Kyleakin Hills SAC, and to what degree these effects can be mitigated for both routing options. RSPB reiterated their serious concern over Route Option 3B through Glen Arroch, as it presents on-going long-term negative impacts for several Schedule 1 and Annex 1 species including white-tailed eagle, golden eagle and hen harrier.
- 7.2.19 There was an overwhelming response from the local community in favour of the preferred alignment and design solution in this section. The community provided numerous responses, including a 3,000 signatory petition, supporting the preferred alignment, and stating their opposition to the alternative option, referred to as Route Option 3B through Glen Arroch and Kylerhea. Responses stated the natural beauty of the area, the ferry route across Kyle Rhea and route through Glen Arroch, and potential impact on habitats and species who are present and frequent the area as key reasons in their opposition of Route Option 3B, and support for the preferred alignment.
- 7.2.20 SSEN Transmission recognises the significant level of support from the local community toward the preferred alignment, as opposed to Route Option 3B (Glen Arroch). The potential impact of an OHL on the community, and landscape and visual receptors through this sensitive landscape, has been a key reason in the decision to route the preferred alignment within Route Option 3A. However, whilst a preferred alignment and design solution has been identified, an alternative option via Glen Arroch has not been ruled out at this stage given the sensitivities of the Kinloch and Kyleakin Hills SAC / SSSI, crossed by both options. As such, both options continue to be assessed through the EIA stage of the project until a final decision has been made prior to the



section 37 application being submitted. This decision will be informed through the Habitats Regulation Appraisal and EIA process.

Section 4

- 7.2.21 Responses from THC and NS in Section 4 focussed on the alignment at Loch Coire Shubh, near Kinloch Hourn. THC note the deviation to the preferred alignment here in comparison to the existing OHL, acknowledging this is due to health and safety concerns associated with developing towers along the existing OHL alignment. NS advise that the preferred alignment for Section 4 has the potential to result in significant effects on the special landscape qualities of the Knoydart NSA and the Kinlochhourn Knoydart Morar WLA.
- 7.2.22 HES note that care should be taken in relation to the siting of tower positions within the vicinity of scheduled monuments at the western extent of this section, but believe that with care the preferred alignment would not increase the level of impact in comparison to the existing OHL. Woodland Trust Scotland identified a number of ancient woodlands that could be impacted by the preferred alignment and design solution in this section.
- 7.2.23 Responses from the local community and relevant landowners in Section 4 also focussed on the alignment at Loch Coire Shubh, near Kinloch Hourn. Responders felt that the preferred alignment and design solution would impact on this dramatic and beautiful landscape, noting that the existing OHL is set back from the main view toward Kinloch Hourn.
- 7.2.24 SSEN Transmission recognise the sensitivities of the landscape within Section 4, and the concerns noted with regard to the preferred alignment at Loch Coire Shubh. The preferred alignment has sought to minimise landscape and visual impacts where possible, whilst also ensuring the constructability of the OHL in accordance with health and safety requirements and legislation. A design workshop was held with NS and THC during January 2022 to explain these challenges and constraints within this area. On balance, it is considered that the preferred alignment and design solution in this section is taken forward as the proposed alignment and design solution.

- 7.2.25 NS highlight that the preferred alignment at the far western part of Section 5 lies adjacent to the Kinlochhourn Knoydart Morar WLA, the effects on which should be considered. Furthermore, the preferred alignment passes close to component parts of the West Inverness-shire Lochs SPA, which is protected for breeding common scoters and black-throated divers. There is potential here for a significant effect from disturbance, displacement and collision risk. Potential for impact and opportunities for mitigation should be identified.
- 7.2.26 The Woodland Trust identified a number of ancient woodlands that could be impacted by the preferred alignment and design solution in this section. Whist RSPB stated substantial concerns regarding the OHL construction between Loch Garry and Loch Loyne, and the potential impact on common scoters and black-throated divers (both qualifying features of the West-Inverness-shire Lochs SPA), and advise undergrounding of this section.
- 7.2.27 There were no specific written responses received for Section 5 from the local community.
- 7.2.28 In response to the comments received by Woodland Trust, SSEN Transmission will seek to minimise loss or damage to areas of woodland as far as practicable. With respect to comments by NS and RSPB, these are noted and will be considered during the EIA stage of the project. There are no plans to underground this part of the line.
- 7.2.29 As such, and subject to further review and assessment through the EIA stage of the project, SSEN Transmission propose that, on balance, the preferred alignment and design solution in this section is taken forward as the proposed alignment and design solution.



Section 6

- 7.2.30 THC, FLS and HES all share concerns with respect to an OHL connection within Section 6, particularly on approach to and connection into Fort Augustus Substation. NS highlighted proximity to the West Invernessshire Lochs SPA.
- 7.2.31 Similarly, responses from the local community were also focussed on the potential impact at Auchterawe of further overhead lines.
- 7.2.32 SSEN Transmission noted these concerns during previous consultation responses and it is now proposed to extend the extent of underground cabling in Section 6 to approximately 9 km to facilitate rationalisation of the electricity network in this area.

7.3 Proposed Alignment and Design Solution

- 7.3.1 The proposed alignment and design solution is shown on Figures 1.0a to 1.6 and largely adopts the preferred alignment and design solution presented within the Skye Reinforcement Project Consultation Document: Alignment Selection (September 2021), and at consultation events, albeit an extension to the length of undergrounding in Section 6 is now proposed to facilitate rationalisation of the electricity network in this area.
- 7.3.2 Within Section 3 of the project, whilst a preferred alignment and design solution has been identified, an alternative option via Glen Arroch has not been ruled out at this stage given the sensitivities of the Kinloch and Kyleakin Hills SAC / SSSI, crossed by both options. As such, a proposed alignment and design solution is not yet confirmed as both options continue to be assessed through the EIA stage of the project, with a final decision being made prior to the section 37 application being submitted. This decision will be informed through the HRA and EIA process.



8. CONCLUSIONS AND NEXT STEPS

8.1 Conclusion

- 8.1.1 This Report on Consultation documents the consultation process which has been undertaken for the project between September 2021 and January 2022 during the alignment selection stage of the project. The programme of consultation was designed to engage with stakeholders including statutory and non-statutory consultees, local communities, landowners and individual residents in order to invite feedback on the rationale for and approach to, the selection of the preferred alignment and design solution.
- 8.1.2 This report has described the key responses received and provides detail on the actions proposed in response to the issues raised. The consultation process has confirmed that the preferred alignment and design solution set out within the Consultation Document: Alignment Selection (September 2021) shared with stakeholders should in general be taken forward as the proposed alignment and design solution into Stage 4: EIA and consenting, albeit an extension to the length of undergrounding in Section 6 is now proposed to facilitate rationalisation of the electricity network in this area.
- 8.1.3 Within Section 3 of the project through the Kinloch and Kyleakin Hills SAC / SSSI, further review of both options during the EIA and HRA process is required before a final decision on a proposed alignment and design solution is made prior to the section 37 application being submitted.

8.2 Next Steps

- 8.2.1 The project has now been taken into Stage 4 (EIA and consenting).
- 8.2.2 As part of this stage of the project, a request for a Scoping Opinion was made to the Scottish Ministers under Regulation 12 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 in December 2021. A Scoping Report³¹ was submitted to support the request, which sought input from statutory and non-statutory consultees regarding the information to be provided within an EIA Report to accompany a section 37 application under the Electricity Act 1989. Such an application is anticipated to be made during July 2022.
- 8.2.3 Should further site and desk-based analysis at the EIA and consenting stage identify a particular constraint, a further review of the proposed alignment and design solution may be required.

Skye Reinforcement Project: Report on Consultation – Alignment Selection

 $^{^{31}}$ Scoping Report - Skye Reinforcement Project - December 2021, produced by SSEN Transmission

