

**Spittal to Loch Buidhe to Beauly 400 kV
OHL Connection
Environmental Impact Assessment
Volume 5 | Technical Appendix**

Appendix 6.3 | Scoping Matrix

July 2025



Table 1: Scoping Matrix

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
1	Ardgay & District Community Council (ADCC) ADCC01	Scoping Clarity	Request for environmental information. The community seeks detailed clarification on the proposed development due to uncertainty regarding the specifics of the pylons.	Annex A pages 99-110	Throughout this EIA Report	The Applicant has engaged with local communities and provided clarification on the specifics of the towers, including proposed locations and dimensions where available. This information is included within this Environmental Impact Assessment (EIA) Report.
2	ADCC02	Scoping Opinion	Legislation and guidance states that both environmental and social impacts of any proposed development should be included in an Environmental Impact Assessment. Specifically, issues which are potentially significant for natural and human factors and their interactions should be addressed. 'Where a scoping opinion is adopted, the EIA report must be based on that scoping opinion and must include the information that may reasonably be required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment.'	Annex A pages 99-110	Throughout this EIA Report	<p>The Application for consent for the Spittal to Loch Buidhe to Beauly 400 kilovolt (kV) overhead line (OHL) Connection has been carried out in line with the process laid out in the Section 37 of The Electricity Act 1989, including public consultation. Further to this SSEN Transmission's own route selection guidance has been followed. This process places emphasis on consultation at each phase of the project and is reported within Volume 2, Chapter 4: The Routeing Process and Alternatives of this EIA Report. All consultation responses related to Ecology and Nature Conservation have been considered.</p> <p>This EIA Report has identified environmental and social impacts of the development as per legislative guidance. The final assessment reflects the scoping opinion and includes all necessary details to facilitate a reasoned conclusion regarding the potential for significant effects on the environment, informed by current knowledge and appropriate methodologies.</p>

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3	ADCC03	Baseline Assessment	Baseline studies and methodology must be agreed with the relevant regulatory authorities so that the EIA addresses both positive and negative issues. The development size, features, physical location, land status, social/cultural setting as well as environmental issues (i.e. habitat, ecology etc.) should all be detailed. Positive and negative impacts, if they are significant, will require further research and the potential for requirement of management. This will inform proposed mitigation measures as it will qualify impact of the proposed development and suggest mitigation measures to reduce or even negate the negative impacts of a proposal.	Annex A pages 99-110	Throughout this EIA Report	The methodology used for assessing significance of effect is described in Volume 2, Chapter 5: EIA Process and Methodology.
4	ADCC04	Terms of Reference	Ardgay & District Community Council would like the opportunity to comment on the Terms of Reference when they are developed and ready to inform the process.	Annex A pages 99-110	N/A	The Applicant welcomes comments on the Proposed Development submitted for planning permission.
5	ADCC05	EIA Scoping	It is of paramount importance that the list of issues that Ardgay & District Community Council respond to as consultees is clear, relevant to the proposal and are accurately targeted thus, securing constructive feedback via this consultation process. This will ensure the EIA is accurately developed and takes cognisance of all the pertinent factors as raised by consultees.	Annex A pages 99-110	N/A	This EIA has been developed taking cognisance of all pertinent factors raised by consultees. Details of the consultation process are provided in Volume 2, Chapter 6: Scope and Consultation .
6	ADCC06	Limit of Deviation (LOD)	It is the view of A&DCC that there is a requirement for greater certainty in what is being proposed. A&DCC consider that an LOD of 100 m is unacceptable and that the whole concept of "micro-siting by condition placed on the consent" is inappropriate. The locations and the heights of the proposed pylons need to be confirmed.	Annex A pages 99-110	N/A	The concerns regarding the level of detail and certainty associated with pylons' locations and heights are noted. Locations and heights of the proposed towers are provided in this EIA Report.

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7	ADCC07	Ancillary Works	A&DCC stated that ancillary works associated with the proposed development should not be considered as having deemed consent and that the definition of cumulative effects clearly references that such matters as site preparation and earthworks, construction and operational phases should be taken into consideration.	Annex A pages 99-110	Throughout this EIA Report	The consenting strategy has been agreed with the Energy Consents Unit and The Highland Council. Site preparation and earthworks have been considered.
8	ADCC08	Section C of Proposed Route	The proposed route of the proposed line of pylons has been subdivided into 5 sections. In respect of Ardgay and District Community Councils area of coverage the main section of focus for A&DCC is Section C identified as "West of Dornoch". A&DCC state that it would be more accurately described as Kyle of Sutherland.	Annex A pages 99-110	Throughout this EIA Report	As part of Alignment Consultation, the name of Section C has been amended to Section C: Loch Buidhe to Dounie.
9	ADCC09	Cumulative Impacts	Cumulative impacts need to be assessed comprehensively. Particularly combination of the effects.	Annex A pages 99-110	Throughout this EIA Report	Cumulative impacts including in combination effects have been assessed in this EIA Report.
10	ADCC10	Cumulative impacts	A&DCC would contend that for Section C the list of sites include considered in the cumulative assessment include the following wind farms: Achany (Operational) Beinn Tharsuinn (Operational) Beinn nan Oighrean (Operational) Rosehall (Operational) Lairg Estate (Operational) Coire na Cloiche (Operational) Lairg II (Approved) Garvary (In planning) Achany Extension (Approved) Strathrory (Approved)	Annex A pages 99-110	Throughout this EIA Report	Operational wind farms are included in the environmental baseline. EIA developments submitted for approval or approved have been included in this EIA Report. Developments at scoping and screening stage have also been assessed where there is sufficient information to do so.

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			Strath Oykel Approved) Acheilidh (aka Lairg III) (In planning) Allt an Tuir (Scoping) Coille Beith (Scoping) Creachan (Scoping) Inveroykel (Scoping) Balblair (Scoping)			
	ADCC11	Cumulative Landscape and Visual Impact Assessment	A&DCC strongly advise that the list of proposed developments to which a cumulative landscape and visual impact assessment is undertaken is based on that which is in this response and any further proposed developments that come forward in the meantime.	Annex A pages 99-110	Throughout this EIA Report	As above.
	ADCC12	Landscape and Visual Impact Assessment	A&DCC stated the accuracy of the Landscape and Visual Impact Assessment will be questioned if it is based on the level of information as cited in the Scoping Report where it is stated that pylons may be “be 57 m above ground level in height on average, with a maximum extension height of up to 70 m”. Also note that the landscape and visual impact assessment cannot comply with established best practice and be considered competent until it is clear where the pylons are actually being sited.	Annex A pages 99-110	Volume 2, Chapter 7: Landscape and Visual Chapter	The LVIA has assessed the proposed design height to the towers and the Proposed Alignment. The LVIA has considered the potential for changes in the placement of the towers within the horizontal limit of deviation (hLOD) and the height of the towers, the vertical limit of deviation (vLOD). Where a change in the level of effect is anticipated as a result in a change to either the hLOD or vLOD this is noted in the reporting. Reasonable horizontal deviations may occur to minimise environmental impact but stay consistent with wayleave boundaries. The LVIA has been undertaken based on the latest route alignment design and shown in the Webmap.
	ADCC13	Landscape and Visual amenity	In respect to Issues Scoped Out: Landscape and Visual amenity A&DCC have concerns regarding light pollution, A&DCC request that baseline night surveys are undertaken in respect of the	Annex A pages 99-110	Volume 2, Chapter 7: Landscape and Visual Chapter	Night-time working is not anticipated and there is no permanent lighting associated with the towers. There are therefore no anticipated impacts from light pollution as a

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			zones of theoretical visibility and in reference to agreed viewpoints			result of the Proposed Development and night-time landscape effects are not assessed.
	ADCC14	Ecology and Nature Conservation	A&DCC consider it of paramount importance that accurate survey findings are presented to inform the EIA process.	Annex A pages 99-110	Volume 2, Chapter 8: Ecology and Nature Conservation	Survey findings are presented in this EIA Report.
	ADCC15	Ecology and Nature Conservation	In respect of nature conservation A&DCC welcome the Scoping Reports commitment that “a BNG Assessment Report will be produced, detailing the approach to assessment and toolkit results (including baseline units, post development units, temporary impacts and impacts on irreplaceable habitat). The BNG Assessment Report will include the proposed planting design to achieve the target biodiversity units. “However, A&DCC have concerns regarding the “impacts on irreplaceable habitat”. These concerns relate to which species habitat will be lost and how does the applicant propose to replace that which is “irreplaceable”? This very statement calls into question the legitimacy of the BNG and commitment of the applicant to Biodiversity Net Gain. There have been some concerns raised in respect of this concept in regard to what it actually means in reality. Will badger setts be lost but the net gain be more deciduous woodland which is appreciated by squirrels? Or will the sea eagle bird strikes on the powerlines be compensated by bat boxes randomly placed along the pylon route? A&DCC remain unconvinced regarding BNG when ANY mention is made to impacting on irreplaceable habitat such habitats should be identified and excluded from encroachment by the development or by the enabling works for said development or any cumulative	Annex A pages 99-110	Volume 2, Chapter 8: Ecology and Nature Conservation	<p>The Applicant is committed to net gain on all projects with results published within a Biodiversity Net Gain Report (Volume 5, Appendix 8.8).</p> <p>Through the routing selection process (Volume 2, Chapter 4: The Routeing Process and Alternatives) and into the post consent detailed design, SSEN Transmission work to minimise the impacts of their developments on the environment inclusive of “irreplaceable habitats”. Indeed, as these habitats cannot be replaced within the lifespan of the Proposed Development, they are reported on in an addendum to the BNG Report (Volume 5, Appendix 8.8). Whilst “irreplaceable habitats” cannot be replaced it may in some circumstances be possible to provide habitat planting which replicates the functionality of the habitat lost and provides connectivity to similar habitats, for example, planting woodland of a similar type to join fragmented pockets of woodland listed on the ancient woodland inventory (AWI). This, whilst not replacing the ancient woodland lost, provides habitat for the diversity of species which occupy that habitat.</p> <p>BNG is a purely habitat-based metric which does not (yet) consider the species which inhabit the habitats assessed.</p>

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			impact of this development and any other development (whether by the applicant or a third party).			As such a net gain must be achieved by providing greater biodiversity value through habitat provision, effectively overcompensating for those habitats lost as detailed in Volume 5, Appendix 8.8 .
	ADCC16	Issues scoped out of the Ecology and Nature Conservation assessment	Regarding issues scoped out of the ecology and nature conservation assessment: A&DCC do not agree with the methodology proposed given the degree of inaccuracy likely to be a consequence of the LoD and its impact on survey findings. A&DCC do not agree with the issues that are considered to be out of scope. A&DCC have serious concerns regarding the potentially critical cumulative impact of the development.	Annex A pages 99-110	Volume 2, Chapter 8: Ecology and Nature Conservation	The Applicant notes A&DCC's position on the issues scoped out of the Ecology and Nature Conservation Assessment. This EIA has adhered to guidance and best practice as per the noted chapter.
	ADCC17	Ornithology	A&DCC call into question the methodology of approach in respect of ornithology survey and the resulting findings. Given the level of ambiguity as a result of the LoD A&DCC cannot accurately comment in respect of methodology and any resultant survey findings. There therefore needs to be a greater level of clarity to influence surveys and finding. This then informs the potential for mitigation. A&DCC also request that migration routes and patterns are included in surveys.	Annex A pages 99-110	Volume 2, Chapter 9: Ornithology	The baseline bird surveys were designed to cover the LoD as well as the Proposed Alignment as well as a wider buffer area informed by the ecology of individual species. Surveys included recording of migratory routes during flight activity surveys.
	ADCC18	Ecology field surveys	A&DCC questions how ecology field surveys survey work can possibly be undertaken given the degree of work that is required to undertake the survey work as detailed in this report along the route within the LoD of that route. In addition, given that the sites of the compounds and borrow pits is NOT known. This calls into question the accuracy and validity of any survey work undertaken and therefore the validity of the findings presented. A&DCC consider it of paramount importance that accurate survey findings are presented to inform the EIA process.	Annex A pages 99-110	Volume 2, Chapter 8: Ecology and Nature Conservation	Ecological surveys for the Proposed Development have been underway since Spring 2024 with teams of surveyors walking over the alignment (inclusive of LoD) and in some cases alternative alignment options. Surveyors have collected evidence of protected species presence through identification of field signs and shelters, as reported in the noted chapter and further detailed in Volume 5, Appendix 8.4 . Further to this, habitats along the alignment (including the LoD) have been mapped in line with industry recognised habitat survey methods

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						Volume 5, Appendix 8.3. By following industry recognised guidance the results of surveys may be deemed valid. Accurate survey findings are presented within the technical appendices of this EIA Report, specifically Volume 5 and mapped within Volume 3.
	ADCC19	Hydrological connectivity	The scoping report states, "Hydrological connectivity to sites designated for nature conservation is not expected to exceed 2 km, as such designated sites beyond this threshold are scoped out of the assessment." A&DCC disagree with the premise of this statement when one considers the cumulative impact and as stated in the Report. The ecological impacts of development sites should be assessed on a whole catchment, from source to outfall and beyond, survey.	Annex A pages 99-110	Volume 2, Chapter 10: Water Environment	Hydrological connectivity distance to protected sites has been identified by hydrological specialists (Volume 2, Chapter 10: Water Environment) at 1 km. Within the noted chapter a precautionary approach has been applied extending this distance to 2 km. SEPA LUPS Guidance Note 31 ¹ has been used in respect to groundwater, to determine impacts up to 250 m from ecological features, this is further detailed within Volume 5, Appendix 8.2.
	ADCC20	Cultural Heritage	A&DCC have concerns regarding this approach to cultural heritage importance and assessment. The Planning, Listed Buildings and Conservation Areas (Scotland) Act 1997 makes no distinction between category of listed buildings. The setting of ALL listed buildings, regardless of category assigned is protected and is a material consideration in the assessment of any development proposal. To limit assessment of the OHL route to the Inventory Battlefield of Carbisdale and the Category A listed Shin Viaduct does not meet the basic requirements of the primary legislation relating to these cultural heritage receptors.	Annex A pages 99-110	Volume 2, Chapter 12: Cultural Heritage	All significant listed buildings and their settings have been considered in accordance with the Planning, Listed Buildings and Conservation Areas (Scotland) Act 1997 within Volume 2, Chapter 12: Cultural Heritage to enable a thorough assessment of the potential impacts on cultural heritage.

¹Land Use Planning System SEPA Guidance Note 31 <https://www.sepa.org.uk/media/144266/lups-gu31-guidance-on-assessing-the-impacts-of-development-proposals-on-groundwater-abstractions.pdf>

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	ADCC21	Water Environment (Hydrology and hydrogeology)	Proper assessment should be undertaken when route alignment and siting of the individual pylons has been determined.	Annex A pages 99-110	Volume 2, Chapter 10: Water Environment	Please see Volume 2, Chapter 10: Water Environment .
	ADCC22	Private water supplies	In regard to private water supplies nine have been identified within one kilometre of the proposed development. Given the LoD A&DCC question the accuracy of this figure and further, given the essential nature of water supply A&DCC do not find this degree of potential variable impacts from the proposed development acceptable.	Annex A pages 99-110	Volume 2, Chapter 10: Water Environment	Please see the Volume 2, Chapter 10: Water Environment for an assessment of private water supplies.
	ADCC23	Noise & Vibration	Given that the exact alignment was not known when consulting A&DCC, the inaccuracy of information makes it impossible to assess the approach to gathering the baseline or make any meaningful comment in this regard.	Annex A pages 99-110	N/A	Further consultation on the Proposed Alignment was held in February and March 2025.
	ADCC24	Noise & Vibration	A&DCC noted that the methodology for the assessment of noise sensitive receptors as detailed in paragraph 13.2.2 states that noise sensitive receptors are residential properties located within 500 meters of a nominal centre line of the proposed route. Given that the proposed route is not known and there is a significant line of deviation which has the potential to significantly change these receptors we question how meaningful the EIA will be in this regard. The community is concerned at the potential for corona discharge noise and hum from the proposed power lines along with aeolian noise which is likely to be greater given the location of the proposed development corridor within a predominantly rural area where such noises are alien.	Annex A pages 99-110	Volume 2, Chapter 15: Noise and Vibration	This has been noted. Volume 2, Chapter 15: Noise and Vibration follows best practice and guidance.

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	ADCC25	Recreation & Tourism	A&DCC note that both Ardgay and Culrain have been omitted from the list of settlements recorded as within the vicinity of the proposed development and stated that though they are smaller settlements they are never the less settlements within the vicinity of the proposed development and should not be overlooked in any EIA.	Annex A pages 99-110	Volume 2, Chapter 16: Tourism and Recreation	Ardgay and Culrain are within the study area for tourism and recreation (in Sections C and D respectively), and receptors in these areas have been included in the baseline and considered as part of the assessment in Volume 2, Chapter 16: Tourism and Recreation .
	ADCC26	Recreation & Tourism	A&DCC question how the significance of the noted likely impacts on tourism economy have been assessed.	Annex A pages 99-110	Volume 2, Chapter 16: Tourism and Recreation	Volume 2, Chapter 16: Tourism and Recreation provides an assessment of impacts on users of tourism and recreation receptors within the Study Area for the Proposed Development. Impacts on the wider tourism economy have been assessed as part of the Socio-economic Technical Assessment.
	ADCC27	Recreation & Tourism	A&DCC note that at paragraph 15.3.2 "these effects will be highlighted within a separate socio-economic report that will accompany the application" this contradicts the fact that socio economics are outwith scope.	Annex A pages 99-110	Socio-Economic Report	Socio-economics are outside of the scope of this EIA Report. Socio-economic effects are assessed in the Socio-economic Technical Assessment.
	ADCC28	Recreation & Tourism	A&DCC question where the baseline data for any socio-economic report will come from at a later date if socio economic are out of scope.	Annex A pages 99-110	Socio-Economic Report	The Socio-economic Technical Assessment provides a socio-economic baseline.
	ADCC29	Impacts scoped out	A&DCC do not agree that the following should be out of scope: <ul style="list-style-type: none"> Major Accidents and Disasters; the community believe that there is inevitably a risk for major accidents and disasters with a development of this scale carrying such a high voltage. There is increased risk from the current baseline and this should be in scope within any EIA for the proposal. Electric and Magnetic Fields; the community have raised concerns regarding potential significant detrimental impacts and increased EMI from the proposed OHL. 	Annex A pages 99-110	Socio-Economic Report	The scope of the assessment is agreed with the ECU. Socio-economic effects including jobs and GVA are assessed in the Socio-economic Technical Assessment

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			<ul style="list-style-type: none"> Radio and TV Interference; concern has been raised regarding the proposed OHL impacting on Radio and TV reception. Concern has also been raised for the potential interference the OHL will have in respect of “Smart Meters” downloading data. Population and Human Health; Demography – the site is located in an area that is deemed to be a fragile community where depopulation and the difficulty of population retention are key issues. The impacts of the proposal on demographic change should be in scope. The cumulative effects of renewable energy infrastructure on the wellbeing of the local population should be addressed. Socio Economics; A&DCC firmly believe that there are considerable socioeconomic impacts from the proposed pylons and overhead powerline. 			
	ADCC30	Alternatives	Ardgay and District Community Council’s preferred option for the transmission of electricity transfer to areas of demand remains via undergrounding and/subsea cable, A&DCC state that no one has presented a detailed argument as to why this cannot be the proposed option and in order to fully inform the EIA process it should be fully assessed. It seems that in other areas of Scotland (and the UK as a whole) undergrounding is possible and A&DCC maintain the position that for Section C it remains the preferred option. The dismissal of this potential approach “due to excessive cost” has never been fully explained and A&DCC doubt whether it has even been assessed.	Annex A pages 99-110	Volume 2, Chapter 2: Established Need for the Proposed Development	Please see Volume 2, Chapter 2: Established Need for the Proposed Development

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	ADCC31	Development Description	A&DCC state that as a community it is difficult to comment in detail on a proposed development when specific details such as the height of individual pylons and precise location (given the LoD).	Annex A pages 99-110	Volume 2, Chapter 3: Description of the Proposed Development.	The details of the Proposed Development are set out in Volume 2, Chapter 3: Description of the Proposed Development.
	ADCC32	Ancillary works	A&DCC consider that many of the works that the applicant seeks to be deemed as granted planning permission, given the potential impacts of these activities and the locations, are such that they will have a significant and long lasting (in many cases permanent) impact. A&DCC believe that the applicant is attempting to exclude these activities from the EIA in their entirety and A&DCC find that that is reprehensible.	Annex A page 66	Throughout this EIA Report	This EIA Report identifies the potential for significant effects on the environment resulting from ancillary works.
	Arqiva	Telecommunications	Arqiva have considered whether the development is likely to have an adverse effect on their operations and have concluded that for the majority of the route they have no concerns however, they have identified that the path goes very close to the following Arqiva assets and as such, they ask that pylons are not placed within 75m of the following locations thus avoiding any possible interference as outlined above. Balblair Wood – 259320 – 895270 Auchmore Wood – 248360 – 850150 Olrig Hill – 317765 – 965823 Rumster Forest – 319783 - 938545	Annex A page 66	N/A	Where practicable the Applicant will site towers 75 m from specified Arqiva assets.
	The British Horse Society Scotland (BHSS) BHSS01	Equestrian planning access arrangements	Equestrian users should be considered and accommodated alongside other non-motorised users when planning access arrangements during the construction phase and beyond. The BHS have stated they can provide guidance on suitable surfaces and infrastructure to accommodate equestrians and	Annex A pages 67-68	Volume 5, Appendix 16.1 Outdoor Access Management Plan	The Applicant acknowledges the need to consider equestrian users in the planning of access arrangements during both the construction phase and the operational phase of the development.

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			other access takers and are willing to work with the applicant on these aspects.			Volume 5, Appendix 16.1: Draft Outdoor Access Management Plan has been developed so that access arrangements are inclusive and minimise disruption for all stakeholders.
	BHSS02	Traffic and Transport	Vehicles travelling to and from work sites are likely to meet equestrians on the road and drivers should be advised of this risk. BHS have enclosed a copy of "Guidance to drivers of large vehicles" document.	Annex A pages 67-68	N/A	Noted. Guidance contained in this document will be included in the induction training for all HGV staff during the construction phase.
	Brora Community Council (BCC) BCC01	Alternative Routes Considered	Brora Community Council stated their preference is that the EIA contains a full and detailed evaluation of all the options considered rather than just a summary as suggested in section 3.4.5 of the Scoping Request.	Annex A pages 111 -112	Volume 2, Chapter 4: The Routeing Process and Alternatives	The alternative options considered and the reasons for identifying a Proposed Alignment and design solution are provided in Volume 2, Chapter 4: The Routeing Process and Alternatives . In addition, this information has been provided in the route and alignment stage Reports on Consultation.
	BCC02	The Loch Fleet, Loch Brora and Glen Loth SLA	Brora Community Council stated that this locally designated area forms the setting of their coastal community and is a precious resource for our residents and visitors. Therefore, it is primary importance that the effects on this special landscape are properly assessed with full consideration of the future validity of the SLA's special qualities in the light of what is proposed.	Annex A pages 111 -112	Volume 2, Chapter 7: Landscape and Visual	The LVIA chapter includes a comprehensive assessment of the potential effects on the Special Landscape Area (SLA). This assessment has considered the SLA's special qualities.
	BCC03	LVIA – Area of Search.	Brora Community Council suggest that there is greater flexibility regarding the area of search, which is limited to 10km, to cover some of the important longer northward views from Brora, Embo and Dornoch.	Annex A pages 111 -112	Volume 2, Chapter 7: Landscape and Visual	The LVIA Study Area has been defined following a desk study, fieldwork, preparation of visibility mapping, and consultation with THC and NatureScot. Based on an examination of the existing landscape, landform, and the predicted extent of visibility from sensitive visual receptors, the assessment considered the area extending up to 10 km from the proposed overhead line (OHL), focusing on key receptors identified within the 2 km Study Area where significant effects are predicted to occur. Any

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						effects on views and visual amenity beyond the 10 km radius from the proposed OHL alignment are predicted as negligible due to the static, transparent nature of the steel lattice tower, intervening vegetation, and/or rolling landforms.
	BCC04	LVIA - Mapping and Visualisations	<p>Brora Community Council noted that they support the use of The Highland Council Visualisation Standards for Wind Energy Developments (2016). These guidelines should be strictly adhered to particularly with respect to the photographic standards specified. The Council wish to be consulted on the local Viewpoint selection when the final OHL application route is decided and prior to work on the LVIA.</p> <p>The council suggest that for key viewpoints within this scenic stretch of coastline The Highland Council Single Frame Panoramic Viewer is utilised as described in Section 5 of their Standards.</p>	Annex A pages 111 -112	Volume 2, Chapter 7: Landscape and Visual	<p>The Highland Council Visualisation Standards for Wind Energy Developments (2016) guidelines have been followed particularly with respect to the photographic standards specified.</p> <p>Highland Council and Nature Scot have been consulted regarding viewpoints.</p> <p>The Applicant will consider the recommendation to utilise The Highland Council Single Frame Panoramic Viewer for key viewpoints within this scenic coastal stretch, as outlined in Section 5 of the Standards, to enhance the visual assessment process.</p>
	BCC05	LVIA - Mapping	<p>Brora Community Council strongly request that more detailed base mapping at 1:25 000 or at very least 1:50 000 OS is used in the application EIA.</p> <p>In addition, they further request that map references and AOD information is supplied for proposed pylon positions as part of the development information provided.</p> <p>All major access tracks should be included in all mapping of the OHL route, within the visualisation terrain model and be included in all the visualisations where they are likely to be visible. (THC Standards 2.23).</p>	Annex A pages 111 -112	Volume 2, Chapter 7: Landscape and Visual	<p>All information will be provided in the respective LVIA report for each section, along with associated mapping and visualisation. Key sources to inform the assessment are listed below:</p> <p>1:50,000 mapping – Ordnance Survey;</p> <p>5 m and 50 m Digital Terrain Model – Ordnance Survey;</p> <p>Scottish Landscape Character Assessment Data – NatureScot Datasets;</p> <p>Gardens and Designed Landscapes - Historic Environment Scotland Datasets;</p> <p>National Scenic Areas – NatureScot Datasets;</p> <p>Core Paths Inventory – The Highland Council</p>

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						Road Network – Meridian 2 Data; and Cumulative Data compiled by ERM GIS Team.
	British Telecoms (BT) BT01	Telecommunications	BT have requested the co-ords for all the structures of height along the proposed route. BT cannot study the proposed route with respect to EMC and related problems to BT point-to-point microwave radio links. Therefore, cannot confirm if the project would not cause interference to BT's current and presently planned radio network.	Response received after formal EIA Scoping	N/A	Co-ordinates of all the structures of height along the proposed route have been provided to BT to confirm if the Proposed Development would not cause interference to BT's current and presently planned radio network.
	MBNL01	Telecommunications	MBNL are seeking specific coordinates of the pylons and for a contact to discuss any issues.		N/A	Co-ordinates of the pylons have been provided.
	Contin, Strathpeffer, and Marybank, Scatwell and Strathconon Community Councils (CSMSSCC) CSMSSCC01	Description of the Proposed Development - Need for the Proposed Development	The council stated that a clear statement of need will be required. Seeking confirmation on the following: Exactly how much capacity for the link? Is this nameplate capacity, average power, or what? How much of the time will the design capacity be needed? How could peak requirement be managed down? What alternative approaches (route, technology, overall approach) have been considered, bearing in mind eventual needs for 2050? Schedule 4 Clause 2 of the 2017 Regulations is relevant here.	Annex A pages 113 - 122	Volume 2, Chapter 1: Introduction and Background Volume 2, Chapter 2: Established Need for the Proposed Development Volume 2, Chapter 3: Description of the Proposed Development Volume 2, Chapter 4: The Routeing	This EIA Report provides a description of the Proposed Development need and alternative approaches, including various routes and technologies.

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					Process & Alternatives	
	CSMSSCC03	Description of development - OHL Design	Seeking clarity on whether the maximum height is 70 m, or not?	Annex A pages 113 - 122	Volume 2, Chapter 3: Description of the Proposed Development	The details of the Proposed Development are set out in the noted Chapter.
	CSMSSCC04	Description of development - OHL Design	All locations where it is expected that tower height will exceed 57 m should be identified in the final plans. Inter-tower distances of <350 m will be needed occasionally to accommodate deviations and obstructions on the ground, locations where two or more distances consecutively are expected to be <350 m should be identified on plans.	Annex A pages 113 - 122	Volume 2, Chapter 3: Description of the Proposed Development	The details of the Proposed Development are set out in the noted Chapter.
	CSMSSCC05	Cumulative effects	EIA methodology must consider the cumulative effect of the proposed development, its associated and ancillary works (e.g. the new substations, the new permanent access tracks and timber clearances, and other electricity developments nearby, especially wind turbines and the additional transmission infrastructure that is likely to be required to service these developments.	Annex A pages 113 - 122	Volume 2, Chapter 5: EIA Process and Methodology	This has been noted. Volume 2, Chapter 5: EIA Process and Methodology details the EIA methodology.
	CSMSSCC06	Landscape and Visual	Request for the landscape impact to take account of the current, essentially rural, landscape and the effect that creeping change and cumulative impact are having on this rural character.	Annex A pages 113 - 122	Volume 2, Chapter 7: Landscape and Visual	The Applicant acknowledges the importance of evaluating the landscape impact in relation to the current rural setting. The noted chapter has considered the effects of the proposed development on the existing rural character.
	CSMSSCC07	Landscape and Visual	Stated support for the use of The Highland Council Visualisation Standards for Wind Energy Developments (2016).	Annex A pages 113 - 122	Volume 2, Chapter 7:	Visualisations of the Proposed Development have been prepared to The Highland Council Visualisation Standards for Wind Energy Developments (2016).

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
					Landscape and Visual	
	CSMSSCC08	Landscape and Visual - Viewpoints	<p>The council suggest additional viewpoints are needed from an appropriate point in Contin village, and from the Coul House Hotel and/or Mid Coul. There should be a view from a suitable point on Strathpeffer Golf Course, either the clubhouse or the 10th hole.</p> <p>The Councils wish to be consulted on the local Viewpoint selection when the final OHL application route is decided and prior to work on the LVIA.</p>	Annex A pages 113 - 122	Volume 2, Chapter 7: Landscape and Visual	The Highland Council and Nature Scot have been consulted regarding viewpoints.
	CSMSSCC09	Landscape and Visual – Mitigation	<p>The Council is concerned particularly about the impact on the large number of users of the highly accessible land around Loch Kinellan, and the users of the highly accessible parts of Contin Forest.</p> <p>The Council request that measures be taken to minimise the appearance of the OHL on the skyline, and that the skyline sections to be highlighted on plans. Suggested measures to reduce impact might include dividing the circuits, for which a precedent exists at NH 643 730.</p>	Annex A pages 113 - 122	Volume 2, Chapter 7: Landscape and Visual	Primary and secondary mitigation measures have been established and effectively implemented according to best practice GLVIA3 to address the likely visual effects resulting from the proposed OHL alignment around Loch Kinellan and Contin Forest.
	CSMSSCC10	Landscape and Visual	The council expect data collection to monitor access to key areas including Contin Forest and Loch Kinellan, over an adequately long time to capture seasonal variability in use.	Annex A pages 113 - 122	Volume 2, Chapter 7: Landscape and Visual	Visitor surveys have not been undertaken and publicly available information has been used where available.
	CSMSSCC11	LVIA	The council seek clarification conclusion on significance for the LVIA will be drawn in an un-biased way.	Annex A pages 113 - 122	Volume 2, Chapter 7: Landscape and Visual	The assessment has been conducted in line with industry guidance and best practice prepared by the UK's Landscape Institute. In this regard the judgements on significance have been made on the basis of a clear methodology and reasoning.

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	CSMSSCC12	Residential Visual Amenity	The council state that 'as far as possible' proviso attached to 170 m standoff is not acceptable, neither is 'wherever possible' attached to the 100 m minimum. The council expect the EIA to identify all sections of line within 170 m and 100 m of occupiable properties.	Annex A pages 113 - 122	Volume 2, Chapter 7: Landscape and Visual	This has been noted.
	CSMSSCC13	Landscape - Issues Scoped Out	The council have reservations about this statement in P6.14.5 of the scoping report: "Residential properties located at a distance greater than 170 m from the Proposed Development will generally not be assessed as part of the RVAA". At 170 m, the standard tower still presents a visual angle of 18.5°.	Annex A pages 113 - 122	Volume 2, Chapter 7: Landscape and Visual	This has been noted.
	CSMSSCC14	Cultural Heritage – Baseline Assessment	The council highlighted the need for comprehensive data on cultural heritage assets. Although information on designated cultural heritage assets and many non-designated assets is available via Historic Environment Scotland (HES), the data available on NRHE/Canmore is far from comprehensive in terms of non-designated assets. The Highland Historic Environment Record (HER) maintained by the Highland Council holds additional information on non-designated assets. The council stated that the 'extensive baseline assessment' in P9.3.1 of the scoping report is far from being comprehensive in terms of recorded sites.	Annex A pages 113 - 122	Volume 2, Chapter 12: Cultural Heritage	Further data including the HER has been used to inform the cultural heritage baseline. In addition, a cultural heritage walkover survey has been undertaken.
	CSMSSCC15	Cultural Heritage – Survey	The council stated that since very little of the area along the route has been systematically surveyed, there are, in all likelihood, huge numbers of unrecorded sites. The council asked whether a systematic survey will be undertaken.	Annex A pages 113 - 122	Volume 2, Chapter 12: Cultural Heritage	A cultural heritage walkover survey has been undertaken as part of the Proposed Development and reported in the noted chapter.

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	CSMSSCC16	Cultural Heritage – Scoping	<p>The council stated that in terms of cultural heritage, the scoping report fails to:</p> <ul style="list-style-type: none"> properly recognise the cultural value which many of these landscape features carry for local communities and visitors acknowledge in more than passing terms the value which sites have not just individually but as elements of the wider cultural heritage landscape take cognisance of the intangible heritage inextricably linked with the landscape along the route. The mention of assessment of intangible heritage as part of the last bullet point in 9.8.3 is less than reassuring, especially as no details are given as to how the assessment would actually be undertaken. Archaeologists are rarely expert in intangible heritage and this kind of research should be undertaken by appropriately qualified people with a deep understanding of the intangible heritage of the Highlands. 	Annex A pages 113 - 122	Volume 2, Chapter 12: Cultural Heritage	<p>EIA heritage assessment in the noted chapter follows guidance and best practice with additional consultation undertaken with THC and HES as required.</p> <p>The CEMP and written scheme of investigation (WSI) will provide guidance should any previously undiscovered heritage features be located during construction.</p>
	CSMSSCC17	Cultural Heritage	<p>The council stated that it is a major weakness of the methodology proposed in Section 9.8 of the scoping report that it fails to recognise the cultural importance of the many 'receptors' (recorded and as yet unrecorded) and historic/cultural landscapes along the route or to propose any way to assess the impacts (social and economic) which the development of massive OHL infrastructure will have on these.</p> <p>In addition, the assessment methodology also fails to identify or set out measures to measure the likely effects of degradation of the historic environment and intangible heritage assets in tourism terms.</p>	Annex A pages 113 - 122	Volume 2, Chapter 12: Cultural Heritage	<p>EIA heritage assessment in the noted chapter follows guidance and best practice with additional consultation undertaken with THC and HES as required.</p> <p>The CEMP and WSI will provide guidance should any previously undiscovered heritage features be located during construction.</p>
	CSMSSCC18	Cultural Heritage	The council noted that section 9.8.3 (list of research resources) of the scoping report fails to identify the major value of research	Annex A pages 113 - 122	Volume 2, Chapter 12:	Formal engagement has been undertaken with local heritage groups and organisations, although data transfer

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			carried out by local heritage organisations and amateur experts, often involving local people with archaeological qualifications and invaluable hands-on experience of surveying their local 'patches'.		Cultural Heritage	and communication has been largely on an ad hoc basis. It was therefore not included as a definitive source of information.
	CSMSSCC19	Water environment	Enquiries suggest that not all private water supplies in the area affected by option D1.3 have been identified by the approach used. Table 11.14 of the scoping report should be updated during production of the EIA because there are newly registered supplies	Annex A pages 113 - 122	Volume 2, Chapter 10: Water Environment	The noted chapter includes an updated list of private water supplies which have been assessed where applicable.
	CSMSSCC20	Water environment - Issues Scoped Out	Consideration needs to be given to the risk of damage to towers as a result of large debris carried by flood waters, e.g. trees	Annex A pages 113 - 122	Volume 2, Chapter 10: Water Environment	Towers have been strategically located outside of SEPA flood zones where feasible in order to minimise flooding impacts to the towers and upstream and downstream receptors.
	CSMSSCC21	Water environment - Issues Scoped Out	The council recommend that potentially hazardous activities are not undertaken in likely drinking water supply catchments, nor the catchments to stream headwaters. Such potentially hazardous activities include the storage of fuels and other toxic chemicals, the re-fuelling of vehicles, and the emplacement of cementitious material in the ground.	Annex A pages 113 - 122	Volume 2, Chapter 10: Water Environment	All works during the construction phase, including those referenced by the Community Councils, will be subject to best practice mitigation measures secured through the EIA, GEMPs and CEMP.
	CSMSSCC22	Water environment - Baseline	The council stated that use of the Sichardt equation is not supported by the hydrogeological profession, and it is not found in standard hydrogeology texts, see https://www.mdpi.com/2073-4441/14/2/149 . It appears to be based on radially symmetric porous medium flow, an assumption that cannot be justified in the fractured low-porosity rocks that dominate the line route. It also uses as input a hydraulic conductivity value, that is not going to be available. A significantly more nuanced approach is needed, accepting that fractured rocks are difficult.	Annex A pages 113 - 122	Volume 2, Chapter 10: Water Environment	As a first principal excavations of less than 1 m and more than 1 m will be located more than 100 m and 250 m respectively from any groundwater abstractions (including private water supplies) in accordance with SEPA Guidance (LUPS31). Where excavations are located within these buffers a standalone private water supply risk assessment will be completed, which will include a standalone assessment of the potential connectivity between private water supplies and construction works

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			Given that alternatives to the existing private water supplies are not practicable, a very conservative approach will be needed.			that will be completed in accordance with SEPA and THC guidance.
	CSMSSCC23	Traffic and transport - Baseline Conditions	It is important that the EIA identifies all locations where improvements to roads and bell-mouths are required	Annex A pages 113 - 122	Volume 2, Chapter 14: Traffic and Transport	Locations where improvements to roads and bell-mouths are required have been identified in this EIA Report.
	CSMSSCC24	Traffic and transport - Assessment Methodology	The council suggested that parts of the area is strongly seasonal and is affected by short-duration events such as public holidays. Therefore, the council suggest monitoring for a full twelve months is required instead of the proposal to monitor traffic for a week.	Annex A pages 113 - 122	Volume 2, Chapter 14: Traffic and Transport	Traffic counts have been undertaken outside of public holidays.
	CSMSSCC25	Traffic and transport	The council noted that the road network in the project area is very sparse and there are many bottlenecks. Abnormal loads have the potential to cause major disruption. For example, if the A835 between Contin and Garve (6 miles) is disrupted, the next shortest route is approx. 100 miles and involves single-track roads not suitable for all traffic. This section of trunk road is narrow and has many blind bends and summits.	Annex A pages 113 - 122	N/A	No abnormal loads are anticipated.
	CSMSSCC26	Noise and vibration - Baseline	The council request that all occupiable properties within 500 m of the chosen line are identified on a map.	Annex A pages 113 - 122	Volume 2, Chapter 15: Noise and Vibration	As part of design development, the OS AddressBase has been used to identify properties which have the potential to be impacted by the Proposed Development.
	CSMSSCC27	Noise and vibration - Surveys	The council would expect continuous noise monitoring and accept that this should be supplemented by spot measurements so that the continuous record can be set in context.	Annex A pages 113 - 122	Volume 2, Chapter 15: Noise and Vibration	The methodology of assessment for the Proposed Development has been discussed with the Local Planning Authority (THC) Environmental Health Officer (LPA EHO) (see Volume 2, Chapter 15: Noise and Vibration for further information).

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	CSMSSCC28	Consideration of Alternatives	It is essential that there are full details of the alternative options considered, and the process used to determine the power transmission requirement for the line, the appropriate technology, and the general alignment including the decision not to upgrade the present 275 kV corridor, as well as detailed route selection.	Annex A pages 113 - 122	Volume 2, Chapter 2: Established Need for the Proposed Development Volume 2, Chapter 4: The Routeing Process and Alternatives	Please see noted chapters.
	CSMSSCC29	Habitable Properties	The council request the identification of all habitable properties within 100 m, 170 m and 500 m of the Proposed Alignment.	Annex A pages 113 - 122	N/A	As part of design development, the OS AddressBase has been used to identify properties which have the potential to be impacted by the Proposed Development.
	CSMSSCC30	Socio-economics	The council seek a robust demonstration that the specific proposed development meets all of the requirements of NPF4 Policy 11.	Annex A pages 113 - 122	Socio-Economic Report	NPF4 has been considered in the Socio Economic Technical Report.
	CSMSSCC31	EIA Methodology	The council note that there are many places where it is indicated that the project team will make 'professional judgements' on matters local to the proposal. The council suggest that these judgements need to be properly informed by local circumstances with which the consultants may not be familiar and suggest strongly suggest that there needs to be community input to these judgements.	Annex A pages 113 - 122	All chapters	All assessments comply with best practice guidance.
	Creich Community Council (CCC) CCC01	Issues Scoped Out	The council consider that the following issues that have been proposed to be Scoped Out of the EIA Report should be considered:	Annex A pages 123 - 134	Volume 2, Chapter 2: Established Need for the	The scope of the assessment has been agreed with the ECU and Statutory Authorities including The Highland Council.

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
			<ul style="list-style-type: none"> Land Use, Population and Human Health, Socio-Economics: The council state that land use is intimately connected to the socio-economic structure of the community with its heavy emphasis on tourism and farming and also the well-being of the community. This visual amenity must not be thought of as only a tourist 'sightseeing' element – although that underpins commercial benefit. The view of the land and the relationship of the population to the land and the waters is close. It is part of their understanding as a community. Electric and Magnetic Fields: The council state that they do not accept that EMF may be 'scoped out' for HVAC overhead and buried lines – it remains a concern for many people. They state it can be avoided if DC transmission is used. Major Accidents and Disasters: The council are concerned that overhead power lines will face an increasing issue in future from presently unlikely events, bringing with it the risk of moor and woodland fire caused by clashing cables or pylon collapse. 		Proposed Development	
	CCC02		<p>The council are concerned about lack of background information on strategic decisions and discussion of engineering options in the Scoping Report. They are seeking answers to the following questions:</p> <ul style="list-style-type: none"> Why is this proposed OHL required? Is it capacity only? Can subsea cables not transmit the required power to the 'areas of need'? Would the present transmission system be adequate if substantial power were transmitted subsea? What are the 	Annex A pages 123 - 134	<p>Volume 2, Chapter 2: Established Need for the Proposed Development</p> <p>Volume 2, Chapter 4: The Routeing</p>	Please see noted chapters.

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
			<p>perceived weaknesses in the existing system that have not been explained?</p> <ul style="list-style-type: none"> What benefits does this new line give to the national grid system in the Highlands that would not be gained by a subsea route? Why has HVAC transmission been selected as opposed to HVDC which has been selected for the Western Isles link. The distance from generation to 'area of need' for this transmission is ideal for HVDC and not for AC. If there is a need that has not been specified for intermediate connections of renewable energy would this not be better served by a DC link as the renewable generators on land are mainly DC providers? 		Process and Alternatives	
	CCC03	Socio Economics	The council insist that they get to see the arguments to support this statement in section 5.2.4 of the Scoping Report: "...projects expected to provide substantive support to the economy of Scotland in terms of direct and indirect employment and business investment, with wider economic benefits support to employment and benefits to business".	Annex A pages 123 - 134	Socio Economic Technical Assessment	The assessment of direct and indirect employment and business investment, and wider economic benefits is provided in the Socio-economic Technical Assessment.
	CCC04	Consideration of Alternative	The council urge that alternative approaches in the transmission technology and location of the cables are adequately considered.	Annex A pages 123 - 134	<p>Volume 2, Chapter 2: Established Need for the Proposed Development</p> <p>Volume 2, Chapter 4: The Routeing</p>	See noted chapters.

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
					Process and Alternatives	
	Dunbeath and Berriedale Say No to Pylons Action Group (DBSNPAG) DBSNPAG01	Ecology and Nature Conservation	<p>The area under consideration for this project ecologically significant landscapes, including the Flow Country Peatlands, recently inscribed as a UNESCO World Heritage Site, Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Sites of Special and Scientific Interest (SSSIs).</p> <p>Wild Land Areas (WLAs): Including Causeymire – Knockfin Flows and Ben Klibreck – Armine Forest, which are highly valued for their wild character and unspoiled beauty.</p> <p>The EIA must rigorously examine the impact of construction, including potential habitat destruction, carbon release from disturbed peatlands, and visual impacts.</p>		<p>Volume 2, Chapter 8: Ecology and Nature Conservation</p> <p>Volume 2, Chapter 11: Geological Environment</p> <p>Volume 2, Chapter 7: Landscape and Visual</p>	<p>This EIA Report has assessed the impacts of the Proposed Development on the World Heritage Site – The Flow Country, in line with the assessment of other statutory designated sites located within or adjacent to the Proposed Development. Volume 2, Chapter 8: Ecology and Nature Conservation chapter has assessed the impacts on the World Heritage Site from an ecological perspective and assess the impacts on sensitive ecological receptors.</p> <p>In parallel to this EIA Report and to accompany the application for consent, THC Flow Country World Heritage Site Impact Assessment Toolkit has been completed for criterion ix for which the site has been inscribed.</p> <p>The Applicant acknowledges the ecological significance of the landscapes in the Proposed Development area. This EIA has rigorously assessed the potential impacts of construction activities, paying special attention to the risks of habitat loss, carbon release from disturbed peatlands, and visual impacts on these ecologically important areas in the chapters noted.</p> <p>Detailed peat depth surveys have been conducted to inform the layout and design process and to avoid areas of deep peat and limit potential carbon release. The Peatland Carbon Calculator assessment (see Volume 5, Appendix 11.3) has been undertaken to further determine the impact on peatland carbon sequestration capabilities.</p>

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	DBSNPAG02	Baseline Collection	<p>The group disagree with the adequacy of the proposed baseline collection and surveys for the following reasons: Peatland Integrity: The surveys must comprehensively measure the potential impact on peatland hydrology and carbon sequestration capabilities. Any disturbance could result in significant greenhouse gas emissions, undermining Scotland's Net Zero ambitions.</p> <p>Biodiversity Surveys: Insufficient attention has been paid to the potential displacement and mortality of wildlife, including protected species such as golden eagles, hen harriers, and freshwater pearl mussels. Long-term monitoring data is essential, not just short-term snapshots</p>		<p>Volume 2, Chapter 8: Ecology and Nature Conservation Chapter</p> <p>Volume 2, Chapter 10: Water Environment</p> <p>Volume 2, Chapter 11: Geological Environment</p>	<p>Peat depth surveys have been undertaken along all Proposed Alignment where peat is present. These surveys have been considered in the iterative design process, avoiding impacts on peatlands and their associated carbon sequestration capabilities where practicable.</p> <p>The Peat Carbon Assessment has been undertaken to further determine the impact on peatland carbon sequestration capabilities (see Volume 5, Appendix 11.3).</p> <p>The surveys undertaken to inform the ecology and nature conservation impact assessment have been undertaken in line with guidance, as appropriate, to inform a robust assessment.</p>
	DBSNPAG03	Biodiversity Surveys	The group stated that insufficient attention has been paid to the potential displacement and mortality of wildlife, including protected species such as golden eagles, hen harriers, and freshwater pearl mussels. The council stated that long-term monitoring data is essential, not just short-term snapshots.		<p>Volume 2, Chapter 8: Ecology and Nature Conservation</p> <p>Volume 2, Chapter 9: Ornithology.</p>	An assessment of potential displacement and mortality of wildlife is considered in Volume 2, Chapter 8: Ecology and Nature Conservation and Volume 2, Chapter 9: Ornithology .
	DBSNPAG04	Visual Impact Assessment	The group states that the scoping fails to adequately account for the irreversible impact on Scotland's iconic wild landscapes and the potential loss of tourism revenue tied to their preservation.		Volume 2, Chapter 7: Landscape and Visual Chapter	This EIA includes a detailed explanation of how the Proposed Development aligns with the Wild Land Areas (WLAs) and other designated and protected landscapes in Volume 2, Chapter 7: Landscape and Visual . This encompasses an assessment of the potential impacts on the landscape's Special Qualities, along with a discussion

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
					Socio-Economic Report	of mitigation measures to ensure the openness and wildness is preserved.
	DBSNPAG05	Baseline Data	<p>The group urge the inclusion of:</p> <ul style="list-style-type: none"> Climate Change Data: The project's full lifecycle carbon footprint must be assessed, especially given the importance of peatlands in mitigating climate change. Cultural and Tourism Impact Assessments: The economic consequences of visual intrusion on World Heritage Sites and wild land areas must be evaluated. Historical and Archaeological Surveys: The route may affect sites of archaeological significance, which should be protected 		<p>Volume 5, Appendix 11.4: Peatland Carbon Calculator Data</p> <p>Volume 2, Chapter 16: Tourism and Recreation</p> <p>Volume 2, Chapter 12: Cultural Heritage</p>	<p>The request for the information included can be found in the following:</p> <ul style="list-style-type: none"> Volume 5, Appendix 11.3: Peat Carbon Assessment Volume 2, Chapter 16: Tourism and Recreation Volume 2, Chapter 12: Cultural Heritage
	DBSNPAG06	Key Issues or Possible Effects Omitted	<p>The group identified several issues that have been omitted from the scoping and have stated the following:</p> <ul style="list-style-type: none"> Carbon Emissions from Peatland Disturbance: Peat extraction, drainage, and compression during construction will release stored carbon, countering the project's claimed renewable energy benefits. Cumulative Impacts: The report does not adequately consider cumulative effects from other infrastructure projects in the region, including wind farms and other transmission lines. Alternative Solutions: There is no substantive exploration of underground cabling or alternative routing, which could mitigate environmental damage. 		<p>Volume 2, Chapter 11: Geological Environment</p> <p>Volume 5, Appendix 11.2: Outline PMP</p> <p>Volume 5, Appendix 3.6 Outline Construction Environmental Management Plan</p>	<p>Detailed peat depth surveys have been undertaken along all proposed routes where peat is present, with additional data to allow for micro-siting and to limit peatland disturbance through design. Volume 5, Appendix 11.2: Outline Peat Management Plan (PMP) includes details of peat extraction and restoration. The key construction practices will be discussed in full in the CEMP. In addition, Volume 5, Appendix 11.3: Peat Carbon Assessment assesses the impact on peatland carbon sequestration across the Proposed Development.</p> <p>The approach to cumulative effects is detailed in Volume 2, Chapter 5: EIA Process and Methodology, which adequately considers cumulative effects from other infrastructure projects in the region, including wind farms and other transmission lines.</p>

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
					Volume 5, Appendix 11.4: Peatland Carbon Calculator Volume 2, Chapter 5: EIA Process and Methodology Volume 2, Chapter 4: The Routeing Process and Alternatives	The alternative options considered and the reasons for identifying a Proposed Alignment and design solution is set out in Volume 2, Chapter 4: The Routeing Process and Alternatives .
	DBSNPAG07	Issues Scoped Out	<p>The group disagree with the exclusion of the following issues and have stated the following:</p> <ul style="list-style-type: none"> Long-Term Ecosystem Recovery: Recovery of damaged peatland and ecosystems is highly uncertain and should not be scoped out. Tourism and Recreational Impact: The project threatens Scotland's reputation as a destination for natural beauty and outdoor activities, yet this has been minimized in the scoping. Noise and Light Pollution: These effects on wildlife and nearby communities during both construction and operation have been insufficiently addressed. 		<p>Outline Habitat Management Plan.</p> <p>Volume 2, Chapter 16: Tourism and Recreation</p> <p>Volume 2, Chapter 15: Noise and Vibration Chapter</p> <p>Volume 5, Appendix 3.6 Outline Construction</p>	<p>The proposed approach to compensation and enhancement for loss of peatland habitat is presented in the Outline Habitat Management Plan as an annex to Volume 5, Appendix 8.8: BNG Report.</p> <p>Volume 2, Chapter 16: Tourism and Recreation provides an assessment of impacts on users of tourism and recreation receptors within the Study Area for the Proposed Development. Impacts on the wider tourism economy have been assessed as part of the Socio-economic Technical Assessment.</p> <p>This EIA contains a construction noise/vibration assessment in Volume 2, Chapter 15: Noise and Vibration Chapter. The assessment has been carried out by a competent person, in accordance with BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open sites". The contractor will employ the best practicable means to reduce the impact of</p>

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					Environmental Management Plan	noise/vibration from construction activities at all times and details of these will be included in the CEMP. Night-time working is not anticipated and there is no permanent lighting associated with the towers. There are therefore no anticipated impacts from light pollution as a result of the Proposed Development.
	Golspie Community Council (GCC) GCC01	Ecology and Nature Conservation	There is deep local concern about the impact of the pylons on the immediate environment, both visually and in terms of flora and fauna. The natural landscape amenities are very highly valued by residents and visitors alike, and there is real fear of the relentless industrialisation which seems to be going on in respect of electricity infrastructure throughout Sutherland. SSEN should make available results from all the surveys commissioned into wildlife and birds particularly across the whole area; not just those in the selected corridors.	Annex A pages 135 - 137	Volume 2, Chapter 8: Ecology and Nature Conservation	The methods deployed when undertaking surveys and the results of surveys undertaken and used to inform this impact assessment are detailed within Volume 5, Appendix 8.3, 8.4 and 8.9.
	GCC02	Environmental Impact Assessment Methodology	The council state that there do not appear to be any clear criteria or quantitative metrics for the judgement and evaluation of effects in the 'significance assessment'. It should include visual impacts and harm to the natural landscape amenities appreciated by people (in a qualitative assessment), as well as undisturbed habitats for plants and animals (more quantitative analysis). The proposed route through the Golspie Community Area crosses the crofting and agricultural settlement of Backies. Both qualitative and quantitative baseline data on the short term and expected long term impacts on the livelihoods of Backies' residents must be collected to include in the prediction and significance assessment.	Annex A pages 135 - 137	Volume 2, Chapter 5: EIA Process and Methodology	The methodology for significance of effect is provided in Volume 2, Chapter 5: EIA Process and Methodology.

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	GCC03	Environmental Impact Assessment Methodology	The council state that it is essential that local communities are fully involved in both the choice of assessment criteria and the collection of baseline evidence.	Annex A pages 135 - 137	Throughout this EIA Report	This EIA Report has identified environmental and social impacts of the development as per legislative guidance. The final assessment reflects the scoping opinion and includes all necessary details to facilitate a reasoned conclusion regarding the potential for significant effects on the environment, informed by current knowledge and appropriate methodologies.
	GCC04	Bird Surveys	The council have concerns that the surveys of birds on Loch Fleet undertaken around thirty years ago are outdated, and that any assessment should include up to date survey evidence.	Annex A pages 135 - 137	Volume 2, Chapter 9: Ornithology	Survey methods and areas surveyed are presented in Volume 2, Chapter 9: Ornithology of this EIA Report and supporting appendices.
	GCC05	Environmental Impact Assessment Methodology	The council stated that the environmental impact assessment must look beyond immediate mundane disruption and noise to long term degradation of landscape amenities. The visual effect of pylons stretching across Loch Brora is one example of this, and the council has concern for the lack of information is available in the scoping document as to how that and the many other concerns will be evaluated.	Annex A pages 135 - 137	Volume 2, Chapter 7: Landscape and Visual	The Applicant acknowledges the importance of evaluating the landscape impact in relation to the current rural setting. Volume 2, Chapter 7: Landscape and Visual has considered the effects of the Proposed Development on the existing rural character. The assessment has been conducted in line with guidance and best practice.
	GCC06	Environmental Impact Assessment Methodology	Golspie Community Council would like an assurance that all these assessments will be carried out by an independent body, with no vested interest in the outcome.	Annex A pages 135 - 137	N/A	The Applicant is committed to ensuring transparency and impartiality in the assessment process. All assessments have been carried out by qualified independent consultants who have no vested interests in the outcome.
	GCC07	Landscape and Visual - Viewpoints	Any development which breaks the skyline must be subject to the same stringent appraisal as previous commercial wind farm applications and include affected communities in the choice of views and simulations used.	Annex A pages 135 - 137	Volume 2, Chapter 7: Landscape and Visual	THC and NatureScot have been consulted regarding viewpoints. The viewpoints include locations in the region of Golspie.
	GCC08	Key Issues	The council are seeking clarification on the following:	Annex A pages 135 - 137	Volume 2, Chapter 14:	1. This information is detailed in Volume 2, Chapter 14: Traffic and Transport Chapter.

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
			<ol style="list-style-type: none"> Where will the access roads be and what volume of traffic is expected in different areas? What mitigation measures will be taken to reduce the damage to fragile ecosystems and soils? Is there any plan for removal of obsolete infrastructure if and when the high voltage line is completed? What is the estimated carbon footprint of construction (steel from China, fabrication abroad etc.), and does that outweigh the expected gain in domestic energy security and power generation from renewables? What consideration has been given to the recycling/repurposing of the line and/or materials at the end of its/their productive life? The scoping report acknowledges that there will be a need to work on existing corridors where there are pylons and it would be important to make clear what this work is and if work is being undertaken on existing corridors, why it is that these corridors cannot take the new heavy duty pylons, thus obviating the need for a new pathway. 		<p>Traffic and Transport</p> <p>Volume 2, Chapter 11: Geological Environment</p> <p>Volume 5, Appendix 11.2: Outline Peat Management Plan</p> <p>Volume 5, Appendix 11.3: Peat Carbon Assessment</p>	<ol style="list-style-type: none"> This information is detailed in Volume 2, Chapter 11: Geological Environment Chapter. Proposed design methods to reduce the impact on areas of deep peat, such as floating tracks, are included in Volume 5, Appendix 11.2: Outline Peat Management Plan. This will be considered on a case by case basis. A Peat Carbon Assessment (see Volume 5, Appendix 11.3) has been undertaken to understand the impact on peatland carbon sequestration capabilities. The Applicant will seek to manage and minimise waste in line with the waste hierarchy. Should there be any waste arising from the construction of the Proposed Development this would be treated in line with the prevailing waste regulations. Further details will be provided within the waste management plan to be developed by the Principal Contractors. The route selection process is summarised in Chapter 4.
	GCC09	Alternatives Considered	<p>In the public meetings local people have asked about alternatives such as underground or offshore subsea routes and also about the use of existing corridors.</p> <p>The council are seeking more detail on justification for high voltage power lines overhead option for upgrading the electricity grid infrastructure over these alternatives and suggests that alternatives are described in detail so the case for the pylons can be made more clearly.</p>	Annex A pages 135 - 137	Volume 2, Chapter 4: The Routeing Process and Alternatives	The alternative options considered are described in Volume 2, Chapter 4: The Routeing Process and Alternatives

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
	Helmsdale and District Community Council (HDCC) HDCC01	Future Development	The Scottish Government continues to encourage and approve extensive wind energy development in the North which would indicate that significant further strengthening of the grid, including further OHLs, substations and associated development is likely to be required in the decades beyond 2030 in addition to that being currently proposed up to 2030. HDCC feels that it is essential to understand the full extent of potential developments in the coming decades in order to identify the full implications for the District. HDCC ask that the Applicant provides a comprehensive assessment of future needs for further grid expansion beyond 2030 and that the current proposed OHL is presented in this longer-term context.			The National Electricity Systems Operator (NESO) are responsible for balancing electricity supply and demand across Great Britain, including Scotland. NESO also manages contracts for connecting to the electricity transmission system.
	HDCC02	Special Landscape Area (SLA)	HDCC note that the proposed route for the OHL through the District includes a large section of The Highland Council's Loch Fleet, Loch Brora and Glen Loth SLA. HDCC ask that the Applicant explain in detail how the proposals will fit within this designation.		Volume 2, Chapter 7: Landscape and Visual	The Environmental Impact Assessment (EIA) includes a detailed explanation of how the proposed overhead line (OHL) aligns with the designated SLA in the chapter noted. This encompasses an assessment of the potential impacts on the landscape's special qualities, as well as a discussion of mitigation measures to ensure that the integrity of the SLA is preserved..
	HDCC03	Access tracks	HDCC note that access tracks are likely to be extensive along the route. HDCC ask that the Applicant provide details of their locations and include their visual impact as part of the Visualisation submissions.		Volume 2, Chapter 3: Description of the Proposed Development Volume 2, Chapter 7: Landscape and Visual	This EIA Report includes detailed information on the locations of access tracks, as well as an assessment of their visual impact in the noted chapters.

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	Historic Environment Scotland (HES) HES01	Cultural Heritage	The HES recommend that the applicant refers to the EIA Handbook for best practice advice on assessing cultural heritage impacts which offers Guidance for competent authorities, consultation bodies, and others involved in the Environmental Impact Assessment process in Scotland.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	The Applicant acknowledges the recommendation from HES to refer to the EIA Handbook for best practice guidance on assessing cultural heritage impacts. This EIA has been informed by this guidance so that the assessment of cultural heritage is thorough and compliant with established best practices.
	HES02	Cultural Heritage	HES recommend that further pre-application engagement is undertaken with them to ensure appropriate design and mitigation measures are implemented for the historic environment.	Annex A pages 29-49	N/A	The Applicant has engaged with HES throughout the design process to ensure appropriate design and mitigation measures are implemented for the historic environment.
	HES03	Cultural Heritage	HES recommend that an appropriately detailed ZTV should be used to identify potential setting impacts.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	ZTV analysis has been used to assess how the Proposed Development may affect the settings of historic environment assets.
	HES04	Cultural Heritage	HES state that the potential alignment route runs through one of the densest concentrations of scheduled monuments in Scotland, and as a consequence there are a large number of nationally important sites that have the potential to be subjected to significant adverse impacts on their site and setting as a result of this scheme.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	This is recognised and this EIA Report includes analysis of the potential adverse impacts on these nationally important sites and their settings. Where practicable and in consultation with HES the design has been modified to reduce the potential for impact e.g. micro-siting of infrastructure to avoid direct impacts and reduce setting impacts.
	HES05	Cultural Heritage	HES suggest that more weight may need to be given to the historic environment than has been given so far when considering the route, alignment and more detailed design of the proposed 400kV OHL. As the scheme stands, there are a large number of locations where the severity of impacts on the settings of scheduled monuments is likely to raise issues of national interest that means HES would need to object.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	The area through which the Proposed Development passes is highly constrained by multiple environmental factors including, but additional to, the historic environment. The Proposed Alignment has been designed to balance environmental factors alongside technical and economic factors. It has not been possible to avoid significant effects to Scheduled Monuments in every location.

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	HES06	Cultural Heritage	Gallow Hillock, cairn on Backlass Hill (SM450): The potential alignment of the 400kV OHL is located around 1.4km to the west of the cairn and would be very close to the monument in these key western outward views. The alternative alignment would see the line routed much closer to the monument, with the corridor coming within approximately 15m of the scheduled area. Photomontages should be provided in due course, with any significant impacts assessed and ideally avoided.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES07	Cultural Heritage	Bail A Chairn, Broch (SM13634), Carn A Chladha, Broch (SM13632) and Scouthal Burn, Chapel & The Clow (SM721): These sites form a cluster of monuments along the Burn of Acharole with a deliberate relationship with the routeway along the Burn and over the wider flatter ground on either side. It seems probable that views along the burn that take in the monuments and their relationships have the potential to be affected. For the alternative alignment the integrity of these monument's setting would be significantly adversely affected. Photomontages should be provided and the impacts assessed and mitigated as the development progresses.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES08	Cultural Heritage	Achkinloch, stone setting SW of Loch Stemster (SM420) and Achkinloch, chambered cairn 755m SW of Loch Stemster (SM419): The severity of impact on the setting of this monument is likely to be such that HES would object to the scheme in its current form and alignment. A full set of photomontages, showing the full impact of the line along views to the west, north and south of the monument needs to be provided and the impacts fully assessed, with significant impacts mitigated by design.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.

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	HES09	Cultural Heritage	<p>Minera, hut circles 330m SSE of, 370m ESE of and 270m E of (SM6015), Minera standing stone 470m S of (SM457) and Minera, broch 90m SSE of (SM568):</p> <p>The route corridor sits very close to and possibly oversails all three of these monuments. Should the line shift any further west than currently envisaged it would result in significant adverse impacts on these monument's settings. Should this be the case, the potential impacts should be assessed, photomontages provided, and significant impacts avoided by design.</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>
	HES10	Cultural Heritage	<p>Buolacrabher, chambered cairn 1350m SSW of (SM5224), Buolacrabher, chambered cairn 1550m S of (SM445) and Buolacrabher, settlement 1170m S of (SM6014): The severity of impact on the settings of these monuments is likely to be such that HES would object to the scheme in its current form and alignment. A set of photomontages should be provided to demonstrate the scale of impacts and the impacts fully assessed. The design should seek to mitigate the significant scale of impacts currently shown.</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>
	HES11	Cultural Heritage	<p>Bridge of Badnagie, chambered cairn 610m NNW of (SM425), Bridge of Badnagie, settlement 400m NW of (SM5186) and Bridge of Badnagie, standing stone 600m N of (SM5304): It is possible that the line could have a significant adverse impact on their settings. Photomontages should be provided, the impacts assessed, and any significant adverse impacts avoided.</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>
	HES11	Cultural Heritage	<p>Bridge of Rhemullen, broch 450m NWE of (SM574): It seems likely at this stage (without any supporting information) that any impacts would not be significantly adverse.</p> <p>Photomontages from the monument and of it from the area to the southeast should be provided to confirm this. However,</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>

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			should the line shift further east within the corridor then the likelihood of significant impacts would substantially increase, and care should be taken to avoid this.			
	HES12	Cultural Heritage	(SM5088) and Dun Beath, broch, Dunbeath (SM546): Dunbeath Strath contains one of the best-preserved upland landscapes in Scotland containing a large number of scheduled monuments that demonstrate multiple phases of occupation and use of upland areas from the Late Neolithic to the last century. The OHL would cross the mouth of the glen, it would significantly disrupt the experience of entering this upland area and its open, abandoned, and isolated setting. It would also dominate key views from a number of the component elements of the scheduled monuments and oversail and dominate others. The integrity of the settings of a number of individual monuments and the integrity of the group would be significantly adversely affected. The scale of impacts is likely to be of such a scale that we would be likely to object to the proposals if they were to come through in their current form.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES13	Cultural Heritage	Loedebest, settlement (SM5152): Whilst the existing OHL is of limited perceptibility on the skyline beyond, the proposed 400kv OHL is shown crossing the strath, with pylons footed on either side of incision for the river and the line itself visible in views looking towards the coast. Whilst this will clearly represent an adverse impact on the character of the setting of the monument, photomontages are required in order to demonstrate the severity of that impact and inform meaningful mitigation through redesign or relocation.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.

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	HES14	Cultural Heritage	Achorn Bridge, settlements 1100m NNE of (SM5150): Visualisations, assessment and avoidance of impacts will need to be undertaken as the proposals progress	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES15	Cultural Heritage	Balcraggie Lodge, settlement 700m N of (SM5230): 360° photomontages will be required and a full assessment undertaken. Avoidance of significant impacts through mitigation by design should be undertaken.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES16	Cultural Heritage	Cairn Liath, long cairn and round cairn (SM438), Loedebest, cairn 500m SSE of (SM5191), Loedebest, chambered cairn 400m WNW of (SM5163) and Cnoc na Maranaich, chambered cairn, burial cist and standing stone (SM443): The severity of impact on the settings of these monuments is likely to be such that HES would object to the scheme in its current form and alignment. Full photomontages will be required in due course, along with a full assessment. Mitigation by design to avoid these impacts should be undertaken.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES17	Cultural Heritage	Balantrath, broch 135m WNW of (SM522), Achorn, broch 200m NW of (SM511), Achorn Bridge, prehistoric and post medieval settlement 400m ENE of (SM512) and Balcraggie Lodge, four hut circles 300m SSE of (SM3521): The severity of impact on the settings of Achorn Bridge Settlement alone is likely to be such that HES would be likely to object to the scheme in its current form and alignment. It is likely that the impacts on the other monuments would be similarly significant adverse.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.

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			Wide photomontages are needed from all of these monuments, the impacts should be fully assessed and any significant impacts should be mitigated by design			
	HES18	Cultural Heritage	Burg Ruaidh, or Borgue Roy, broch, Berridale Water (SM526): The current potential alignment would not result in significant impacts on the setting of Burg Ruaidh, or Borgue Roy, broch, Berridale Water (SM526). However, should the line shift further west within the corridor the level of impacts could substantially increase. If the line is likely to move in this direction photomontages should be provided, the impacts assessed and any significant impacts avoided by design.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact. Micro-siting of infrastructure within the LoD would not result in any greater degree of impact than that already identified.
	HES19	Cultural Heritage	Upper Borgue, broch (SM596), Upper Borgue, standing stone 410m SSE of (SM502) and Clais-Cairn, chambered cairn 550m SW of (SM424): Although no visualisations have been produced, the severity of impact on the settings of the monuments is likely to be such that we would object to the scheme in its current form and alignment. Wide photomontages from all three sites, including others showing key views towards them should be provided and impacts should then be assessed. Significant impacts should be avoided by mitigation by design.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES20	Cultural Heritage	Rinsary, homestead 500m WNW of, Berriedale (SM3473): The proposed new OHL would be positioned within 38m to the west of the monument. The monument would end up being cut off from all outward and inward views and dominated by lines and pylons on both sides. This would result in a cumulative impact on its setting of a severity such that HES would be likely to object to the scheme in its current form and alignment. 360°	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.

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			<p>photomontages are required, the impacts should be assessed and any significant impacts avoided by design.</p> <p>Any variation of the OHL within the corridor would need to take account of monuments on either side of it: Tulloch Bad a'Chailich, hut circles, settlements, and cairns 400m ENE of (SM3475) and Rinsary, broch and post-medieval farmstead 300m SSW of Berridale (SM577). Appropriate assessment and visualisations would be required should this be explored.</p>			
	HES21	Cultural Heritage	<p>Cnoc Fionn, hut circle 250m SW of (SM3559) and Cnoc Fionn, hut circle 250m SSW of (SM3537):</p> <p>As the current potential alignment would run along and close to the line of the existing OHL in eastern views from both monuments, it is unlikely that it would result in substantially additional impacts on their settings. However, should the lines move westwards within the corridor the potential for significant impacts is likely to increase. Photomontages, assessments, and avoidance of impacts would then be required.</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>
	HES22	Cultural Heritage	<p>Langwell Tulloch, broch 400m SE of Tural Rock (SM3441):</p> <p>All views related to the monument would be completely severed and it would be entirely surrounded and dominated by a pair of OHLs. This would be a significant adverse impact on the monument's setting.</p> <p>360° photomontages of outward views from the monument as well as showing inward views from the south, west and east are required in order to inform the assessment. Mitigation by design to avoid these impacts should be undertaken.</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>

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	HES23	Cultural Heritage	<p>Turnal Rock, hut circle complex 250m NW of Langwell Tulloch Broch (SM13631): The proposed 400kV OHL would come considerably closer to Turnal Rock, hut circle complex 250m NW of Langwell Tulloch Broch (SM13631) than the existing OHL. Whilst it is possible that these impacts could be accommodated into this monument's setting without substantial additional impacts, this needs to be supported by photomontages showing outward views from it.</p> <p>Any proposals to move the line further west within the corridor will need to take this monument into account in order to avoid significant impacts occurring, and appropriate visualisations will need to be provided. Such a move could also bring it closer to Tulloch Turnal, broch 500m WNW of Turnal Rock, Langwell (SM3440), so this too should be considered in relation to any westward realignment. Any movement of the line further east could have similar consequences for Borgue Langwell, homestead 150m NW of broch, Berridale (SM525) and Borgue Langwell, broch, outworks and later settlement, Berriedale (SM524).</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>
	HES24	Cultural Heritage	<p>Cnoc Bad Asgaraidh, chambered cairn 570m E of, Langwell (SM423): The proposed 400kV OHL would cross the valley of the Langwell Water around 400m east of the cairn when viewed along the axis of the chambers. As such, there is a high potential that the OHL would sever the visual relationship that the monument has looking east down to the river valley below. This would represent an adverse impact on the character of the setting of the monument. However, it is not possible to assess the severity of that impact in the absence of visualisations. Photomontages will be required, along with an assessment and</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>

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			any necessary mitigation to reduce or remove significant impacts.			
	HES25	Cultural Heritage	Allt a'Bhurg, broch, Ord of Caithness (SM515): The potential alignment would take the new line to the north of the existing OHL where it crosses Ousdale Burn. However, the corridor sits very close to Allt a'Bhurg, broch, Ord of Caithness (SM515), which has an evocative and remote setting and is widely promoted and visited. Any realignment closer to the monument than the existing would have significant adverse impacts on the integrity of this monument's setting and be of such significance that we might object. Photomontages showing views out from the broch, full assessment of impacts and mitigation to avoid significant impacts would then be required.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES26	Cultural Heritage	Lothbeg Bridge, long cairn 210m ESE of (SM1808): Two route corridor options are suggested around and south of Helmsdale. The southern route is unlikely to result in any significant historic environment impacts as there are few scheduled monuments along this stretch. The only possible exception is at Lothbeg Bridge, long cairn 210m ESE of (SM1808). Provided the new OHL stayed north of the existing this would be unlikely to result in any significant additional impacts on this monument's setting. HES would recommend this route be reconsidered. The northern alternative route, which seems to be the preferred option would, however, be likely to result in a series of significant impacts on scheduled monuments' settings, that would be likely to result in an objection from HES should this option be progressed in its current form.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.

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	HES27	Cultural Heritage	<p>Caen, long cairn 460m NNW of (SM1771), Caen, long cairn and round cairn 470m and 490m W of (SM1770) and Caen, long cairn 530m NW of, Helmsdale (SM432): The severity of impact on the integrity of the setting of these three monuments is likely to be such that HES would object to the scheme in its current form and alignment. Planar photomontages will be needed in order to understand the full scale of impacts.</p> <p>Carn Burn West, 935m WNW of Caen (SM13647) and the cairns at Kilphedir, hut circles & chambered cairns 700m E of (SM290) are likely to be an extension of this group, emphasising the relationship between them and the routeway up the Helmsdale Burn. Along with Salscraggie Lodge, souterrain 40m SW of (SM1884), Kilphedir, hut circle 740m ESE of (SM2814) and Eldeble, broch SW of (SM1863), Carn Burn West sits within the northern route corridor. Any use of this corridor option would have to consider and seek to avoid impacts upon them or their settings. Kilphedir, hut circles & field system 150m-600m E of (SM2809) sits immediately outwith this alignment and would also have to be brought into any consideration of impacts should this corridor be used.</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>This design option has been taken following consultation with HES. The LoD and Proposed Development elements do not interact with the Scheduled Monuments within the Caen valley or the Marrel crossing.</p> <p>As regards the second section, a middle option route has been progressed, moving the northern option south to round on the north side of Beinn Mhealaich.</p> <p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>
	HES28	Cultural Heritage	<p>Clach Mhic Mhios, standing stone, Glen Loth 4000m N of Lothbeg Bridge (SM1778): The monument sits close to the middle of the corridor and the proposed 400kv OHL would pass directly to the east and south of the standing stone, coming within 250m from the monument at its closest. The severity of impact is likely to be such that HES would object to the scheme in its current form and alignment. Planar photomontages showing views from the monument are required.</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>

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	HES29	Cultural Heritage	Carn nan Uaigh, prehistoric settlement (SM13627): The proposed 400kV OHL here would also pass very close to Carn nan Uaigh, prehistoric settlement (SM13627), which also sits within the corridor. Given the proximity of the development here, adverse impacts on its setting seem likely. Planar photomontages should be provided and consideration should be given to this monument in any design updates.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES30	Cultural Heritage	Carrol, fish farm 430m SE, 410m SSE, 660m and 890m SW of (SM13617) and Carrol, broch 600m SSW of, Loch Brora (SM1846): The northern route would not result in significant impacts on these monuments or their settings. Should the corridor be reconsidered then care should be taken to avoid the scheduled areas, to not oversail or dominate them and to maintain the relationship between the broch and the views down to and over the loch and lochside. If this is the case, photomontages should be provided	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	The northern route option has been taken into account in relation to this monument. An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES31	Cultural Heritage	East Kinnauld School, broch NE of (SM1862) and East Kinnauld, fort 1000m NE of Eiden (SM1861): The proposed 400kV OHL would be around 200m east of the broch. Both monuments would become enclosed by the lines as well as physically and visually separated from their surroundings. The draft visualisations provided to HES show a proposed pylon immediately to the south-east of the broch that would be footed directly in line with the narrow view from the broch to the sea beyond, blocking this key outward view. The draft visualisations from the fort show the proposed OHL crossing the key view east along the estuary.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.

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			360° photomontages from both monuments will be required. However, the severity of impact is likely to be such that HES would object to the scheme in its current form and alignment.			
	HES32	Cultural Heritage	<p>Carn Liath, cairn & chambered cairn 1200m WNW of Torboll (SM1772):</p> <p>The potential alignment would pass just in front of the existing OHL as it passes Carn Liath, cairn & chambered cairn 1200m WNW of Torboll (SM1772). It seems likely that these views have already been compromised and the new 400kV OHL would not substantially add to existing impacts, but this needs to be substantiated by a photomontage. Carn Liath sits in both corridor options. Should either be explored further potential impacts should be considered and avoided.</p> <p>Along with Carn Liath, Loch a'Bhiocair, two hut circles and clearance cairns 800m NW of (SM1822) sits within the southern corridor here, with Morvich Lodge, cairns, hut circles & clearance cairns 400m E of (SM1809) sitting immediately outside it. Should this southern option be reconsidered then impacts on these monuments should be assessed and impacts both demonstrated and significant impacts avoided by design.</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p> <p>The southern option remains excluded.</p>
	HES33	Cultural Heritage	<p>Invershin Primary School, settlement 600m E of (SM5498), Invershin Farm, settlement and burnt mound 1200m E of (SM5470) and Invershin Farm, settlement and burnt mound 500m E of (SM5497):</p> <p>Both the potential and alternative alignments and the corridor pass very close to a number of monuments near Invershin: Invershin Primary School, settlement 600m E of (SM5498), Invershin Farm, settlement and burnt mound 1200m E of (SM5470) and Invershin Farm, settlement and burnt mound</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>

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			500m E of (SM5497). These sit between 50m and 100m from both options. It seems likely that the settings of all of these are likely to be affected by the proposals due to sheer proximity. Photomontages are required in order to understand what the full scale of impacts might be.			
	HES34	Cultural Heritage	Invershin Farm, standing stone 220m ENE of (SM1791): The proposed 400kv OHL would cross the Kyle of Sutherland around 350m south of the monument. An existing 132kv runs broadly parallel with the estuary and thus at right angles to the proposed line. Cumulatively these impacts would be a significant, additional and clearly visible detractor from the stones' setting. They would therefore be an adverse impact on the character of the setting of the monument. 360° photomontages are required to demonstrate the scale of impacts.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES35	Cultural Heritage	Battle of Carbisdale (BTL19): The potential alignment is routed around and just outwith the northern and western edges of the battlefield. Whilst it is likely that the steep topography and wooded margins of the battlefield would remain capable of being understood and appreciated, it is not possible to establish the severity of impacts on the character of the battlefield landscape in the absence of visualisations. Photomontages from key points within the battlefield will be required. The corridor here, however, encroaches directly into the battlefield and impacts would need to be fully assessed, including those on buried archaeology and other remains, were the line to shift further east	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	Photomontages from key points within the battlefield are provided. No towers are proposed within the designated battlefield.

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
	HES36	Cultural Heritage	<p>Boath, three chambered cairns NE and NNE of Easter Ballone Farm (SM6644):</p> <p>The potential alignment would pass close to Boath, three chambered cairns NE and NNE of Easter Ballone Farm (SM6644). It seems likely that the line would be absorbed into wider views from and to the cairns but this needs to be substantiated by photomontages from the three cairns. Should the line shift further east within the corridor then the potential for significant impacts is likely to increase. Care will need to be undertaken to prevent this and be informed by a full assessment.</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>
	HES37	Cultural Heritage	<p>Balnacrae, chambered cairn 230m WSW of (SM2396):</p> <p>The draft visualisations show that the proposed 400kV OHL would pass close to and downslope of the cairn. This would be likely to separate the monument from its relationship to Strath Sgitheach and the river below. The severity of impact is likely to be such that HES would object to the scheme in its current form and alignment. Photomontages will be required in order to fully assess the level of impacts and inform mitigation by design to avoid such significant impacts</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>
	HES38	Cultural Heritage	<p>Strath Sgitheach, settlement NW of Cnoc a'Mhuillinn (SM10495) and Firth View, settlement 1300m NW of (SM4728):</p> <p>The potential alignment would pass immediately to the north of Strath Sgitheach, settlement NW of Cnoc a'Mhuillinn (SM10495) and Firth View, settlement 1300m NW of (SM4728), while an alternative alignment crosses directly through them. It is not likely that scheduled monument consent would be granted for any pylons within the scheduled areas. The proposed OHL is shown directly oversailing both monuments, with pylons footed in close proximity to the scheduled areas. The alternative route</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>Following consultation with HES, the alignment has been moved to the north and there is now no oversailing of these Scheduled Monuments. The LoD is now 170 m to the north of the monuments. The resultant alignment change brings Tower 129 into proximity (circa 40 m) south of SM2396.</p> <p>An extensive set of photomontages and wireframes are provided.</p> <p>Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.</p>

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
			would be likely to oversail and dominate these monuments through the level of proximity. It is not clear how much the potential alignment might impact upon their settings. Planar photomontages will be required along with a full assessment.			
	HES39	Cultural Heritage	Loch Kinellan, crannog (SM3987): The proposed 400kV OHL passes to the west of the bowl of land surrounding Loch Kinellan, crannog (SM3987). It seems likely that in this location the OHL could be accommodated into wider outward views but this needs to be demonstrated by a photomontage. Should the line move further east within the corridor the potential for significant impacts is likely to increase. Care should be taken to understand, assess and avoid significant impacts on the setting of this asset.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES40	Cultural Heritage	Dun Garbhlaich, fort, Kilmorack (SM2422), Dun Mor, fort (SM4979), Dun Fhamhair, fort (SM5212) and Dun a Chliabhain, fort (SM2424): The draft visualisations provided to HES show that the proximity to Dun Garbhlaich and Dun Mor in particular is likely to have an adverse impact on their settings of a severity that is likely to be such that HES would object to the scheme in its current form and alignment. Likely impacts on key views from Dun Fhamhair and Dun a Chliabhain looking towards the other forts could not be determined from the draft visualisations. Photomontages showing outward views from all four monuments and key inward views of them will be required to fully understand the full scale of impacts and any required mitigation by design.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	An extensive set of photomontages and wireframes are provided. Any significant adverse impacts identified will be subject to mitigation to avoid or minimise the impact.
	HES41	Cultural Heritage	HES welcome the proposal to assess the impact on the following assets:	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	This EIA Report includes a detailed evaluation of potential impacts on these heritage assets, and their significance

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
			<ul style="list-style-type: none"> Coul House Hotel formerly Coul House (LB1769) Fairburn Inventory Garden and Designed Landscape (GDL00174) Fairburn Tower (LB14030) 			and settings has been thoroughly considered in the design and planning process.
	HES42	Cultural Heritage	<p>HES noted that the following heritage assets are unlikely to experience significant adverse impacts:</p> <ul style="list-style-type: none"> Achingale Mill (LB14976) Dunbeath Castle (LB7936) Dunbeath Castle Inventory Garden and Designed Landscape (GDL00150) Helmsdale Bridge (LB7193) Loth Parish Church (LB7149) Foulis Castle (LB7911) Tulloch Castle, Caisteal Gorach (LB24520) Castle Leod (LB7826). Novar (GDL00303); Castle Leod (GDL00094). Contin Bridge over River Black Water (LB1789) <p>HES are content with these assets being scoped out of assessment at this stage. However, if the proposed route were to be altered, HES would expect them to be reassessed.</p>	Annex A pages 29-49	N/A	<p>The Applicant acknowledges the assessment from HES regarding the listed heritage assets, which are considered unlikely to experience significant adverse impacts.</p> <p>Should there be any alterations to the proposed route, the Applicant commits to re-evaluating these heritage assets so that any potential impacts are appropriately assessed.</p>
	HES43	Cultural Heritage	<p>For the Shin Viaduct near Kyle of Sutherland (LB279) HES have previously identified that impacts may not raise issues of national interest but noted that visibility is still highly likely. HES noted it would helpful if justification can be provided should it be</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	<p>Noted. LB279 has been included in the setting assessment, to provide a rationale alongside the impact assessment.</p> <p>There are unlikely to be any significant impacts in relation to this asset.</p>

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
			determined to scope out entirely the potential impacts on the setting of this asset.			
	HES44	Cultural Heritage Assessment Methodology	HES recommend that an appropriate cultural heritage assessment methodology such as that laid out in Appendix 1 of the EIA Handbook is used for the assessment and welcome the references to the EIA Handbook and to the HES Managing Change guidance series.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	The Applicant acknowledges the recommendation from HES to employ an appropriate cultural heritage assessment methodology, as outlined in Appendix 1 of the EIA Handbook. This EIA has regard to this methodology and provides a robust and thorough assessment of cultural heritage impacts.
	HES45	Cultural Heritage	HES welcome that field surveys are being carried out and recommend that site visits to assess the potential impacts on the settings of assets are also carried out.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	A comprehensive site walkover and settings assessment site visits has been undertaken. The results of these surveys have been factored into the assessment baseline and has informed the impact assessment.
	HES46	Zone of Theoretical Visibility	<p>HES do not generally recommend the use of a specific radius (e.g. 10km study area) is used for the identification of assets which may receive impacts to their settings.</p> <p>HES generally recommend that a ZTV is used in the first instance to identify assets which may receive impacts and any assets which might themselves fall outwith the ZTV but where important views towards them may have visibility of the infrastructure in the background of the asset.</p> <p>HES welcome that section 9.8.4 confirms that a ZTV will be used to identify assets that may receive impacts to their setting.</p>	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	The Applicant acknowledges the methodological note and recommendation. The 10km study area has been used as a guide and influenced by an appropriate ZTV as well and expert knowledge to interpret the 'fuzzy' boundaries of the study areas.
	HES47	Cultural Heritage - Baseline	HES have provided a list of historic environment assets which may be affected by the proposed development, both within and outwith the proposed route. It may be possible to exclude some assets at a later stage once a ZTV has been produced.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	The Applicant acknowledges the list of historic environment assets provided by HES that may be affected by the proposed development. This EIA has taken into account these assets during the assessment process.

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	HES48	Cultural Heritage Chapter	HES welcome that provision of visualisations to demonstrate potential impacts on the setting of historic environment assets is proposed. HES recognise that it may not be possible to produce visualisations for every site, and advise that attention is given to certain sites where this is likely to be particularly relevant. In most cases, full photomontages, often using a 360° or planar view, will be required.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	The Applicant acknowledges the support from HES for the proposed visualisations aimed at demonstrating potential impacts on the setting of historic environment assets. The Applicant has focused on producing full photomontages, particularly for sites where significant impacts are anticipated.
	HES49	Cultural Heritage – Mitigation	Mitigation measures should be considered at an early stage so that they can be incorporated into the design of the project to avoid significant impacts rather than relying on off-setting or compensatory mitigation.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	The Applicant acknowledges the importance of integrating mitigation measures early in the Proposed Development design to proactively avoid significant impacts. This EIA has considered potential mitigation strategies from the outset, ensuring that they are incorporated into the Proposed Development design rather than relying solely on offsetting or compensatory measures.
	HES50	Limit of Deviation (LOD)	LODs will need to be significantly reduced where pylons are proposed near designated assets. In most cases, mitigation through avoidance of impacts should be the primary consideration.	Annex A pages 29-49	Volume 2: Chapter 3 Description of the Proposed Development	The Applicant acknowledges the importance of inputting to the development of a concise LOD with avoidance as a first principle for heritage design input.
	HES51	Cumulative Effects	HES note that section 9.8.7 states that cumulative effects of the proposed development will be assessed and HES welcome this confirmation given the potential for significant cumulative effects, particularly in areas around existing and proposed substations and existing transmission infrastructure.	Annex A pages 29-49	Volume 2: Chapter 12 Cultural Heritage	The Applicant acknowledges the observations from HES regarding the assessment of cumulative effects.
	HES52	Consultation	HES welcome that sections 9.8.2 and 9.9.2 state that consultation with HES and the Councils will continue to identify and address issues as they arise and confirm approaches to	Annex A pages 29-49	N/A	The Applicant has been committed to maintaining continuous consultation with HES and the Council as throughout the project process.

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			mitigation. HES are happy to continue to engage with the applicants as the project progresses.			
	Highlands and Islands Airports Limited (HIAL) HIAL01	Aviation	Highlands and Islands Airports Limited have reviewed the Scoping Opinion and stated that the proposed development options may conflict with the Instrument Flight Procedures for Inverness and Wick Airport. Highlands and Islands Airports Limited need the exact co-ordinates (Eastings and Northings) for each tower to carry out an initial Safeguarding Assessment.	Annex A page 72	N/A	The Applicant acknowledges the concerns raised by Highlands and Islands Airports Limited regarding potential conflicts with the Instrument Flight Procedures for Inverness and Wick Airport. The Applicant has provided the exact coordinates (Eastings and Northings) for each tower location as part of the forthcoming submission.
	HIAL02	Aviation	Highlands and Islands Airports Limited also stated that they require aviation lighting on each of the towers. Highlands and Islands Airports Limited refer to Advice Note 2 'Lighting' for further information (available at http://www.aoa.org.uk/policy-campaigns/operations-safety). Highlands and Islands Airports Limited also ask to consider the lighting requirements as documented in The Air Navigation Order 2016, Article 222.	Annex A page 72	N/A	The Applicant continued to consult with Highlands and Islands Airport Limited regarding the Proposed Development. The need for obstruction lighting is not required.
	Health and Safety Executive (HSE) HSE01	Major Accidents	HSE state that the proposed development, being an overhead line, does not appear to be of a type that would store or process hazardous substances in quantities relevant to the potential for industrial major accidents with respect to The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015.	Annex A page 71	N/A	This has been noted.
	HSE02	Major Accidents	HSE state that the development is not located within a safeguarding zone of an explosives site licensed under the Explosives Regulations 2014 or the Dangerous Goods in Harbour Area Regulations 2016.	Annex A page 71	N/A	This has been noted.
	HSE03	Major Accidents	HSE state that the development is not located within HSE's land-use-planning consultation zones for hazardous substances consented sites	Annex A page 71	N/A	This has been noted.

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
	HSE04	Major Accidents	<p>HSE state that the development crosses the route of a major accident hazard pipeline, the Aberdeen/Conon Bridge high pressure gas pipeline (8105_2364) operated by Scotland Gas Networks. There is potential to initiate a major accident at the major accident hazard pipeline, for example during the development construction phase. HSE suggests that the EIA should show that the operator of the pipeline has been consulted regarding the following issues or that these issues have been considered in the assessment:</p> <ul style="list-style-type: none"> the development restricted area due to the pipeline ensuring the integrity of the pipeline and protecting the pipeline from development and operational works. 	Annex A page 71	N/A	Scotland Gas Networks have been consulted regarding the potential issues highlighted by HSE and have confirmed there are no issues.
	Joint Radio Company (JRC) JRC01	Telecommunications	<p>Having plotted the approximate route given in Appendix A Figure 2.1 (Route), this OHL has the potential for pylons to interfere with several links protected by JRC.</p> <p>JRC understand that this is at the scoping stage, and therefore pylon positions will understandably move. However, it would be helpful to have a spreadsheet of all intended pylon positions, so that we can advise which may cause issues and will need to be moved.</p> <p>JRC requested the NGR (easting, northing) and intended pole type (and height) for each intended pole / pylon so that we can proceed with our analysis.</p> <p>Due to the number of protected links in the vicinity of the links, JRC will need to respond with a HOLDING OBJECTION; until such time as the pylon NGR positions are received, plotted (and cleared)</p>	N/A – further consultation undertaken so only final JRC response (JRC03) included in Annex A.	N/A	JRC were sent grid references for the final tower locations and confirmed to not pose an obstruction. .

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
	JRC02	Telecommunications	<p>JRC have reviewed the current proposed OHL tower locations and have identified that those listed below have the potential to cause interference with the corresponding Neos microwave link. Based on this assessment, JRC must place a soft advisory object to the below tower locations until the final tower positions are agreed upon and confirmed to no longer pose an obstruction.</p> <p>Structure Number: 2C-V1-017 X Easting (m): 259463.563 Y Northing (m): 897152.916 Distance to link (m): 47 Affected link: 0929303/3</p> <p>Structure Number: 2C-V1-018 X Easting (m): 259108.249 Y Northing (m): 897002.698 Distance to link (m): 23 Affected link: 0929350/3</p> <p>Structure Number: 2C-V1-160 X Easting (m): 246423.628 Y Northing (m): 858618.439 Distance to link (m): 38 Affected link: 1040823/2</p> <p>Structure Number: 2C-V1-163</p>	N/A – further consultation undertaken so only final JRC response (JRC03) included in Annex A.	N/A	JRC were sent grid references for the final tower locations and confirmed to not pose an obstruction.

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
			<p>X Easting (m): 246251.592</p> <p>Y Northing (m): 857856.557</p> <p>Distance to link (m): 28</p> <p>Affected link: 0929226/2</p> <p>JRC note that any changes to the development details, particularly the positioning or scale of any towers, will necessitate a re-evaluation of the proposal. JRC require precise grid references for the final tower locations to ensure they do not interfere with existing infrastructure.</p> <p>JRC's objection pertains only to the date of this issue. JRC advised to seek re-coordination before submitting a final planning application. This step will help mitigate the risk of objections arising from any new developments between the initial enquiry and the finalization of the project.</p>			
	JRC03	Telecommunications	<p>Following the reviewed 3D analysis, none of the links are predicted to now be impacted by the OHL towers.</p> <p>On this basis, JRC no longer have any comment to make on this development.</p> <p>That being said, please come back to us should the route change.</p>	Annex A page 73	N/A	This has been noted.
	Kyle of Sutherland District Salmon	Ecology and Nature Conservation	<p>Increasingly, KSDSFB is of the view that the present EIA process is flawed in that it lacks objectivity, underestimates potential risks, overestimates the efficacy of potential mitigation and fails to meaningfully assess cumulative impacts. Too often, impact assessments are being offered on a piecemeal basis in</p>	Annex A pages 69-70	Volume 2, Chapter 8: Ecology and	The Applicant has been through an extensive route selection process to minimise the environmental impacts whilst balancing these with the technical constraints associated with constructability and safe operation of the Proposed Development. Part of this process has been the

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	Fishery Board (KSDSFB) KSDSFB01		<p>that they fail to include, for example, full details of all the river crossings required for a development to be constructed. We are also of the view that enforcement of planning conditions is often too weak to protect the environment and that by the time any remedial action is initiated in response to issues significant damage has already occurred.</p> <p>KSDSFB highlighted the recent listing of Atlantic salmon as endangered in Great Britain and expect any environmental assessment to include:</p> <ul style="list-style-type: none"> • Fish habitat data in any potentially affected watercourse both within and out with the physical boundary of the proposed development. • Fish presence, distribution and abundance data in all potentially affected watercourses. • Macro-invertebrate data in all potentially affected watercourses. • Freshwater pearl mussel (FWPM) abundance and distribution data in all potentially affected watercourses. • Hydrology data, including for any artificial drainage watercourses. Any artificial or modified drainage channels need to be fully mapped as part of the assessment process. • Water quality data (i.e. turbidity, pH, dissolved organic carbon, acid neutralising capacity etc.) in all potentially affected watercourses. 		Nature Conservation Volume 2, Chapter 10: Water Environment	<p>micro-siting of towers to achieve a sufficient standoff from watercourses so as to minimise potential impacts from construction and operation. Details of the site selection process are provided in Volume 2, Chapter 4: The Routeing Process and Alternatives. Further details of the Water Environment impact Assessment are provided in Volume 2, Chapter 10: Water Environment.</p> <p>The noted chapter reports on the EclA undertaken in line with the CIEEM Guidelines for EclA in the UK and Ireland, an industry recognised standard for EclA.</p>
	KSDSFB02	Ecology and Nature Conservation	KSDSFB state that from the maps provided it would appear that the proposal has the potential to impact Kyle of Sutherland watercourses and they anticipate that the applicant will take full cognisance of this.	Annex A pages 69-70	Volume 2, Chapter 8: Ecology and Nature Conservation	An appraisal of freshwater crossing points is presented in Volume 5, Appendix 8.5: Watercourse Crossings Schedule to identify in stream works to be undertaken and the likely effects these will have on fish and freshwater pearl mussels in particular. Further to this, a

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					Volume 5, Appendix 8.5: Watercourse Crossings Schedule	proportionate approach to FWPM surveys was undertaken across the Proposed Development in consultation with, and under licence issued by NatureScot.
	Loth Residents Group (LRG) LRG01	Loch Fleet, Loch Brora and Glen Loth Special Landscape Area (SLA)	Loth Residents Group state that the Loch Fleet, Loch Brora and Glen Loth Special Landscape Area (SLA) is the focus of their attention, and it is of considerable importance to the setting and perception of their area. The group noted that when considering the effects of what is proposed that coastal views from outside the SLA boundary are as significant as are its special qualities and views from within. The group therefore hope the assessment of the impact on the Loch Fleet, Loch Brora and Glen Loth Special Landscape Area (SLA) in the EIA will not be restricted and will be exemplary and objective.		Volume 2, Chapter 7: Landscape and Visual Chapter	The noted chapter includes a comprehensive assessment of the Special Landscape Area (SLA) in line with best practice and guidance.
	LRG02	Consideration of Alternatives	Loth Residents Group state it is vital that the EIA provides a full explanation of the alternatives considered and the degree of sensitive balancing which has been applied to all the route options considered in the area.		Volume 2, Chapter 4: The Routeing Process and Alternatives	The alternative options considered and the reasons for identifying a Proposed Alignment and design solution has been set out in Volume 2, Chapter 4: The Routeing Process and Alternatives.
	LR03	LVIA	The group endorse the use of the Highland Council Visualisation Standards and request that they are rigorously applied in the following respects: a high standard of photography in clear conditions, representations of all proposed new tracks within the Loch Fleet, Loch Brora and Glen Loth Special Landscape Area (SLA) to be included in all mapping, wireframes and visualisations and the use of good high scale mapping so that the height of the OHL can be estimated in more detailed sections with clear contours. Good quality visual material will be vital with		Volume 2: Chapter 7: Landscape and Visual	The Highland Council Visualisation Standards have been applied in the following respects: <ul style="list-style-type: none"> A high standard of photography in clear conditions has been provided High scale mapping has been used to capture relevant details

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			a project of this magnitude to provide a clear understanding for all residents the Loth Residents Group represent.			
	The MET Office (MO) MO1	Telecommunications	The Met Office stated that the route isn't inside any of their consultations zones and will have no impact on the data or services from their weather radar network. Therefore, they have no objections and wouldn't expect to be consulted if a planning application was submitted.	Annex A page 74	N/A	This has been noted.
	Mountaineering Scotland (MS) MS01	LVIA	Request the Scottish Government to ensure that the applicant includes for visual impact assessment recreational summit destinations close to the proposed route. This should include not only Munros, but any Corbetts and Fionas that may be within a reasonable distance of the route, as well as more locally prominent viewpoints.	Annex A page 75	Volume 2, Chapter 7: Landscape and Visual	The Applicant acknowledges the request to include a comprehensive visual impact assessment that considers recreational summit destinations near the proposed route.
	National Gas Transmission (NGS) NGS01	Material Assets	National Gas Transmission stated that there are no National Gas Transmission gas assets affected in the location of the proposed development. National Gas Transmission requested that if the location or works type changes, to raise an enquiry.	Annex A page 76	N/A	This has been noted.
	National Air Traffic Services (NATS) NATS01	Aviation	The proposed development has been examined from a technical safeguarding aspect and does not conflict with NATS safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such	Annex A page 77	N/A	This has been noted.

No.	Consultee	Subject	Summary	Scoping Opinion Page Ref.	EIA Report Reference	Comments
			changes prior to any planning permission or any consent being granted.			
	NatureScot (NS) NS01	Scoping	NatureScot agree with the issues the Applicant intends to scope in and out.	Annex A pages 59-65	N/A	This has been noted.
	NS02	EIA	NatureScot will consider objecting if the impacts raise issues of national interest that cannot be adequately mitigated and do so in accordance with their guidance on Identifying Natural Heritage Issues of National Interests in Development Proposals: https://www.nature.scot/doc/identifying-natural-heritage-issues-national-interest-development-proposals	Annex A pages 59-65	Volume 2, Chapter 8: Ecology and Nature Conservation	This has been noted. All efforts have been made to assess potential impacts thoroughly and to implement effective mitigation measures to enable compliance and address any concerns raised by NatureScot throughout the assessment process.
	NS03	Protected Areas	The proposal will affect many natural heritage interests but our focus in response to the Scoping Report is on the issues where we consider that there is greater risk that impacts on important natural heritage interests may raise issues of national interest. SSEN have been unable to identify a route that avoids crossing the Caithness and Sutherland Peatlands Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site, and the Flow Country World Heritage Site (WHS). Direct and indirect effects on priority peatland habitats and its associated flora and fauna are therefore likely and could be significant. Several areas of upland where carbon-rich soils, deep peat and priority peatland habitat are also likely to be present as identified as Class 1 and 2 through NatureScot's Carbon and Peatland map 2016.	Annex A pages 59-65	Volume 2, Chapter 8: Ecology and Nature Conservation Volume 2, Chapter 9: Ornithology Volume 2, Chapter 11: Geological Environment	The Applicant has made every effort to identify an alignment which minimises impacts on protected sites, habitats (including peatland habitats) and species, whilst balancing environmental impacts with constructability and operational safety constraints. Despite this process, direct and indirect impacts have been identified. Impacts assessed within the noted chapter extend to designated sites with cited biological features relating to habitats and species. Ornithological interest has been covered in Volume 2, Chapter 9: Ornithology . Geological features are covered in Volume 2, Chapter 11: Geological Environment . As the route has been refined, narrowing the Study Area, impacts on designated sites have been removed to reflect the distance to the protected sites and the associated Zol of any potential impact pathway.

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	NS03	Protected areas	<p>The protected areas listed below are those that we currently consider are at greatest risk of significant effects, and where standard mitigation alone may be insufficient to avoid adverse effects. In Annex A we set out the legislative approach to assessing effects on protected areas.</p> <ul style="list-style-type: none"> • Caithness and Sutherland Peatlands SAC • Caithness and Sutherland Peatlands SPA • Caithness and Sutherland Peatlands Ramsar site • Flow Country WHS • Strathfleet SSSI – Moine geology • Strath Carnaig and Strath Fleet Moors SPA (and SSSI) – breeding hen harrier • Novar SPA – breeding capercaillie 	Annex A pages 59-65	<p>Volume 2, Chapter 8: Ecology and Nature Conservation</p> <p>Volume 2, Chapter 9: Ornithology</p>	<p>Impacts on SACs and Ramsar sites have been subject to screening in line with Habitats Regulations Appraisal (HRA) and where Likely Significant Effects (LSE) have been identified or cannot be ruled out these have been taken through to Appropriate Assessment and reported in Volume 5, Appendix 8.7 Shadow Habitats Regulations Appraisal.</p> <p>Impacts on the identified sites have been assessed as part of Volume 2, Chapter 9: Ornithology. In addition, information to inform an Appropriate Assessment has been provided for potential impacts on SPAs and Ramsar sites.</p>
	NS04	Protected Areas	NatureScot also consider that appropriate survey work will be required to inform the assessments for Special Protection Areas for non-breeding wintering geese, waterfowl and swan species and Special Protection Areas for breeding osprey.	Annex A pages 59-65	Volume 2, Chapter 9: Ornithology	Surveys for wintering geese and swan interest have been undertaken, as well as surveys of flight activity over winter for waterfowl and geese in suitable habitats for these species. Breeding raptor surveys have been undertaken, and assessment of osprey territories breeding outside but feeding within SPAs have been undertaken.
	NS05	Protected species	NatureScot have provided SSEN with details of any specific species records they are aware of and directed SSEN to their online Standing Advice. NatureScot agree with the proposed scope of assessment.	Annex A pages 59-65	Volume 2, Chapter 8: Ecology and Nature Conservation	Protected species surveys are reported in Volume 5, Appendix 8.4 Protected Species Technical Report including the results of desk-based assessment and data searches. NatureScot Standing Advice is covered in Volume 5, Appendix 8.1: legislation and Policy Guidance .
	NS06	Protected Areas	The Preferred Route presented in support of the Scoping Opinion overlaps with several other protected areas (not listed	Annex A pages 59-65	Volume 2, Chapter 8:	The Applicant will implement a comprehensive suite of General Environmental Management Plans (GEMPs),

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			above), however it is less likely that these would be directly affected, based on the more refined Alignment Options. There is still a risk of indirect effects which, it is hoped, that the Applicant's suite of General Environmental Management Plans (GEMPs) and Species Protection Plans (SPPs) and Construction environmental Management Plan (CEMP) would largely mitigate significant effects.		Ecology and Nature Conservation Volume 2, Chapter 9: Ornithology	Species Protection Plans (SPPs), and a Construction Environmental Management Plan (CEMP). These measures are designed to mitigate any significant indirect effects and protect the integrity of the protected areas throughout the construction and operational phases of the development. These documents are considered to be embedded mitigation as they are routinely applied on SSEN Transmission projects as standard.
	NS07	Peatland and carbon-rich soil	There are sections of OHL that cross areas of mapped Class 1 and Class 2 peatland through NatureScot's Carbon and Peatland 2016 mapping where impacts on priority peatland and carbon-rich soils are more likely. Detailed studies will be required to determine its quality and sensitivity. NatureScot provide guidance on this in Annex A of the scoping opinion.	Annex A pages 59-65	Volume 2, Chapter 11: Geological Environment	The Applicant acknowledges the presence of sections of the OHL that cross areas of mapped Class 1 and Class 2 peatland, as identified in NatureScot's Carbon and Peatland 2016 mapping, and detailed peat depth surveys have been conducted across areas of Class 1 and 2 peatland. The Applicant has referred to the guidance provided by NatureScot in Annex A of the scoping opinion so that the assessment is comprehensive and adheres to best practices.
	NS08	Landscape and visual amenity	The OHL through route sections C and D passes close to the Dornoch Firth National Scenic Areas (NSA). The OHL Route is close to, but avoids entering, Wild Land Area 29 - Rhiddoroch - Beinn Dearg - Ben Wyvis but does cross a section of WLA 36 - Causeymire - Knockfin Flows. NatureScot agree with the Applicant's approach to assessing effects on landscape and visual amenity as set out in the Scoping Report, chapter 6.	Annex A pages 59-65	Volume 2, Chapter 7: Landscape and Visual	This EIA has followed the approach agreed upon by NatureScot for assessing effects on landscape and visual amenity as detailed in Chapter 6 of the Scoping Report.
	Network Rail (NR) NR01	Traffic and Transport	Network Rail stated that a Traffic Assessment should be included to assess the effects of construction traffic on existing traffic flows and the public road network. Preferred construction	Annex A pages 78- 79	Volume 2, Chapter 14:	The noted chapter includes a Traffic Assessment to assess the effects of construction traffic on existing traffic

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			traffic routes should be indicated. This will enable Network Rail to assess the possible impacts where/if the traffic crosses over/under our infrastructure and the suitability of these crossings.		Traffic and Transport	flows and the public road network. The preferred construction traffic routes have also been indicated.
	NR02	Traffic and Transport	Network Rail requested Scoping Opinion include for details of proposed construction and engineering works near Wick and Kyle of Lochalsh railway lines, with discussion/agreement from NR required for works over the rail network.	Annex A pages 78- 79	Volume 2, Chapter 14: Traffic and Transport	This has been noted.
	Royal Society for the Protection of Birds (RSPB) RSPB01	Ornithological impacts to be scoped in	RSPB state that negative impacts on birds associated with construction and operation of overhead lines (OHLs) are collision, electrocution, displacement, habitat loss, disturbance and barrier effects all of which must be considered.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology Volume 5, Appendix 8.7 Shadow Habitats Regulations Appraisal	Volume 2, Chapter 9: Ornithology of this EIA Report considers and assesses each of these impacts, undertaking detailed assessments for habitat loss, disturbance and displacement and collision. Information to inform AA is presented in Volume 5, Appendix 8.7 Shadow Habitats Regulations Appraisal . The Highland Council WHS Toolkit has been completed for the Flow Country WHS.
	RSPB02	Impacts on protected sites	Due to the location, large scale and timeline of the proposed development, there would be likely significant adverse impacts on habitats and species as well as significant effects on the qualifying interests of sites of national importance, SSSIs, and international importance. This includes extensive SACs, Ramsar sites, the Flow Country UNESCO World Heritage Site and the following SPAs: <ul style="list-style-type: none"> • Caithness and Sutherland Peatlands SPA, • East Caithness Cliffs SPA, • North Caithness Cliffs SPA, • Caithness Lochs SPA, 	Annex A pages 80- 90	Volume 2, Chapter 8: Ecology and Nature Conservation Volume 2, Chapter 9: Ornithology Volume 2, Chapter 10: Water Environment	The Applicant has been through an extensive route selection process to minimise the environmental impacts whilst balancing these with the technical constraints associated with constructability and safe operation of the Proposed Development. Part of this process has been the route selection process and micro-siting of towers to achieve a sufficient standoff from protected sites so as to minimise potential impacts from construction and operation. Details of the site selection process are provided in Volume 2, Chapter 4: The Routeing Process and Alternatives .

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			<ul style="list-style-type: none"> Strath Carnaig and Stath Fleet Moors SPA, Dornoch Firth and Loch Fleet SPA, Lairg and Strath Brora Lochs SPA, Beinn Dearg SPA, Ben Wyvis SPA, Novar SPA, Moray Firth SPA, Inner Moray Firth SPA, North Inverness Lochs SPA, Cromarty Firth SPA, and Glen Affric to Strathconon SPA. <p>As the proposed development is not directly connected with the management of any of the above SPAs, Scottish Ministers must, as the competent authority, make an Appropriate Assessment (AA) of the implications of the proposed overhead powerline on the integrity of the above listed SPAs in light of their site conservation objectives, as required by the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations').</p> <p>The Applicant must provide sufficient information in the EIA Report to inform the Appropriate Assessment.</p>		Volume 2, Chapter 11: Geological Environment	Where it has not been possible to avoid impacts on protected sites and the World Heritage Site, the appropriate reporting of impacts has been undertaken. In the case of SACs a HRA screening exercise has been undertaken to identify LSEs. Where LSEs are identified or cannot be ruled out these have been subject to Appropriate Assessment. The report to inform HRA can be found in Volume 5, Appendix 8.7 Report to Inform Habitats Regulations Appraisal . As detailed in the Scoping Report the World Heritage Site toolkit as issued by THC has been completed for Criteria ix, for which the site has been inscribed Volume 5, Appendix 8.10: The Flow Country World Heritage Site (WHS) Impact Assessment Report . The themes raised within the toolkit have been identified in the appropriate chapters of this EIA Report, including but not limited to; Volume 2, Chapter 8: Ecology and Nature Conservation, Volume 2, Chapter 10: Water Environment and Volume 2, Chapter 11: Geological Environment .
	RSPB03	Survey Methodology	<p>RSPB are concerned the surveys conducted to date are inadequate.</p> <p>Some surveys did not cover one full breeding season, instead they consist of two half seasons which deviated from recommended breeding season survey guidance. RSPB state that the data will be inadequate as two half season surveys do</p>	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	NatureScot were consulted re survey methods and are considered to be appropriate for a development of this scale. Where flight activity surveys for Sections A and B of the Proposed Development were split over two breeding seasons, this is acknowledged and taken into consideration in the assessment.

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			<p>not properly reflect one season of data, far less two seasons. Additionally, the full proposed development area was not covered by surveys (Section 8.2.16), further increasing insufficiency.</p> <p>Robust survey and assessment should be undertaken to inform the final design to avoid or minimise impacts where possible, as per the mitigation hierarchy.</p> <p>RSPB state that in their response to the pre-scoping consultation, dated the 12th of May 2023 they suggested the need for 2 years' worth of surveys for sensitive areas, including for both designated and undesignated sites. RSPB are disappointed that only 1 year of surveys has been conducted.</p> <p>As per NatureScot guidance:</p> <p>Additional survey work after one year may be required in some cases and on some sections of the proposed line, for example:</p> <ul style="list-style-type: none"> • To enable further detailed assessment of impacts of birds on, or connected to, protected areas. • In areas where bird sensitivity is expected or has been shown to be high, especially where activity varies significantly between years. • Where land use changes during survey work may have implications for the use birds make of the landscape and, therefore, the representativeness of survey results (e.g. plantation felling, flooding at the time of survey). <p>Due to the importance of the bird species and habitats present along the routes, the location of designated sites that this proposal passes through or close to and the extended length of construction time (i.e. 4 years, Section 2.7.3), all three of these categories are covered. Therefore, RSPB recommend</p>			<p>Within the assessment, the baseline data transparently identifies uncertainties or potential under-recording within the reporting and assessment, and a precautionary approach to potential presence and flight activity of sensitive species has been taken, informed by other available data sources (such as raptor study group and RSPB data on species distribution and nest sites).</p> <p>Due to the nature of the development, and the habitats present, full coverage of the Proposed Development was not undertaken. The flight activity surveys are targeted at areas and habitats likely to support sensitive species.</p>

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			undertaking two years of field surveys (vantage point, breeding bird and wintering bird) as this will be needed to provide up-to-date information on bird distribution and activity to assess likely effects and inform any required mitigation.			
	RSPB04	Peat Depth and Habitat Surveys	RSPB recommend peat depth and habitat surveys are undertaken along all proposed routes to inform the final alignment deviation choices.	Annex A pages 80- 90	Volume 2, Chapter 8: Ecology and Nature Conservation Volume 2, Chapter 11: Geological Environment	Habitat surveys have been undertaken along the Proposed Development and are reported within Volume 5, Appendix 8.3: Habitat Technical Report . Peat depth surveys have been undertaken in parallel and are reported within Chapter 11: Geological Environment .
	RSPB05	Flight activity surveys	In Section 8.2.10 of the SR it is stated that "Flights are categorised into three height bands: below collision risk height (0-5 m); within collision risk height (>5 to 70 m); and above collision risk height (>70 m)." RSPB disagree that >70m is used as a cut off for above collision height. As stated in Section 2.6.1 of the SR, the steel lattice towers will have "a maximum extension height of up to 70 m, although tower heights may be increased where local topography dictates in order to achieve sufficient clearance distances". Further to this, Section 2.5.3 of the SR states that a vertical LOD of 9m will apply in general. Therefore, tower heights could be more than 79m and so 70m is not "above collision risk height". Added to that, estimate of flight height during VPs is not an exact science, especially with variable topographies. RSPB recommend a broader height band is used to allow for a buffer and for observation error. Due to the importance of some of these areas, RSPB recommend a	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	The maximum height of a pole or tower above ground level is sought to allow a height increase of up to 9 m in general on the proposed tower height presented within Volume 5, Appendix 3.1: Indicative Tower Schedule . Sections of the Proposed Development where towers could exceed 70m have been identified, and all flights in these sections in height bands B and C (i.e. all recorded flights above 5 m) have been included in the assessment of effects on a precautionary basis.

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			precautionary approach is taken. Excluding flights of over 70m may exclude important flights of target species and so collision risk may be underestimated. This should be considered in the EIA.			
	RSPB06	Flight activity surveys	It is stated in Section 8.2.16 of the SR that VP surveys did not achieve 100% coverage of the Proposed Development. The EIA should provide maps showing the areas covered by VPs and the viewsheds to allow appraisal of coverage in areas of known species distribution. Justification should be provided within the EIA if any areas are not covered.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Due to the nature of the development, and the habitats present, full coverage of the Proposed Development was not undertaken. The flight activity surveys are targeted at areas and habitats likely to support sensitive species. Maps of survey coverage are provided.
	RSPB07	Breeding bird surveys	In Section 8.2.19 of the SR it is stated that "Due to access constraints, some surveys for the northern half of the Proposed Development undertaken in 2023 were delayed, with some (first) survey visits taking place in June and some second survey visits taking place in July. As a result, additional targeted breeding bird surveys were undertaken in 2024 in areas of suitable habitat for sensitive species for the northern half of the Proposed Development." As the 2023 surveys are insufficient in informing impact- as they were conducted towards the end of the breeding season and only "target" surveys were conducted in 2024, RSPB are concerned that the surveys conducted will not be sufficient in informing impact. Provision of the methods used and maps showing the area covered in the "targeted breeding bird surveys" need to be included in the EIA.		Volume 2, Chapter 9: Ornithology	Survey methods and areas surveyed are presented in Volume 2, Chapter 9: Ornithology of this EIA Report and supporting appendices. Survey methods were consulted on with NatureScot and feedback incorporated into the survey design and reporting, with Scottish Ministers advising that decisions on bird surveys should be made following discussion with NatureScot.
	RSPB08	Breeding bird surveys	In Section 8.2.23 of the SR it is stated that "Where access tracks or other ancillary infrastructure locations have been finalised following the completion of surveys and will be located outside of surveyed areas, pre-construction follow up surveys may need to be undertaken." RSPB recommend that a desk-based survey is conducted to initially determine if there are likely significant	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Survey methods and areas surveyed are presented in Volume 2, Chapter 9: Ornithology of this EIA Report and supporting appendices.

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			effects in those areas not surveyed. Further to this RSPB strongly recommend the need for pre-construction surveys to be undertaken, should this proposal be consented.			
	RSPB09	Breeding Diver Surveys	Section 8.2.24 of the SR states that "Records of breeding divers were acquired from the RSPB to inform the selection of suitable waterbodies to survey." As per NatureScot guidance, breeding diver surveys should cover all suitable water bodies within 1km of the proposed development, not only those that we have records of divers occupying.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	All waterbodies considered to be suitable for breeding diver within 1 km of the LoD of the Proposed Development were surveyed where access allowed, as set out in the supporting appendices of this EIA Report.
	RSPB10	Breeding Diver Surveys	It is stated in Section 8.2.26 of the SR that "breeding divers are a target species of the flight activity surveys and these records were expected to identify regular flight routes between nesting and feeding sites." It is unclear whether dedicated breeding diver surveys were conducted after confirmation of breeding. As per NatureScot guidance "Focal breeding loch' watches should also be conducted from VPs overlooking each occupied nesting lochan within 1km of the proposed development site. Incoming and outgoing flights should be recorded during the incubation and chick-rearing periods. For proposed development sites that lie on potential flight routes between the sea/feeding loch and a designated site for red-throated divers". This should be clarified in the EIA.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	All waterbodies considered to be suitable for breeding diver within 1 km of the LoD of the Proposed Development were surveyed where access allowed, as set out in the supporting appendices of this EIA Report. Focal surveys of all identified breeding diver waterbodies were not undertaken, in line with the survey methods consulted on prior to commencing surveys. FAS covering the alignment of the Proposed Development provide information on the potential collision risk posed by the Proposed Development to divers.
	RSPB11	Breeding Diver Surveys	RSPB are concerned that breeding diver surveys conducted in the northern half of the proposed development are insufficient to inform potential impact. It is stated in Section 8.2.27 of the SR that "Breeding diver surveys for the northern half of the Proposed Development were undertaken in 2023 in parallel with the general breeding bird surveys." But as stated previously, the 2023 breeding bird surveys in the northern half took place in June and July. It is not stated whether additional target surveys	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	All waterbodies considered to be suitable for breeding diver within 1 km of the LoD of the Proposed Development were surveyed where access allowed, as set out in the supporting appendices of this EIA Report. Focal surveys of all identified breeding diver waterbodies were not undertaken, in line with the survey methods consulted on prior to commencing surveys. FAS covering the alignment of the Proposed Development provide

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			were conducted in 2024. This is especially concerning as both Red-throated Diver and Black-throated Divers are designated features of the Caithness and Sutherland Peatlands SPA and Lairg and Strath Brora Lochs SPA which are in the northern half of the route. This should be clarified in the EIA and further surveys may be required.			information on the potential collision risk posed by the Proposed Development to divers.
	RSPB12	Breeding Ducks and Grebes Survey	As with divers, RSPB are concerned that the surveys conducted for breeding ducks and grebes in the northern half of the proposed development were insufficient to inform an assessment of impacts. This is especially concerning for Common Scoter, a qualifying feature of the Caithness and Sutherland Peatlands SPA and endangered as a breeding species in the UK, 50% of which breeds in the Flow Country, largely to the west of the proposed route. If breeding bird surveys only took place in June and July 2023 (Section 8.2.28) and no additional surveys were conducted in early breeding season 2024 then breeding Common Scoter is highly likely to have been missed.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	No recent records of breeding common scoter were identified within 2 km of the Proposed Development.
	RSPB13	Breeding Ducks and Grebes Survey	Common Scoter have historically been known to breed near the proposed route. RSPB have concerns regarding the potential impacts on Common Scoter, particularly the potential for collision with OHLs during the hours of darkness when Scoter migrate. Wildfowl often migrate at night and therefore the Vantage Point surveys undertaken are unlikely to have recorded them. There is very little understanding of their movements or the routes they use between their breeding lochs and the sea where they winter. Scoter are known to feed at sea during the breeding season and it is possible that birds breeding in the Caithness and Sutherland Peatlands SPA could commute across the proposed OHL route, increasing the likelihood of collision risk.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Nocturnal surveys for common scoter have not been undertaken. No recent records of breeding common scoter were identified within 2 km of the Proposed Development.

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			RSPB therefore strongly recommend undertaking nocturnal surveys where possible, using vertical radar coupled with acoustic recorders, remote camera and surveyor observations during the breeding and migration seasons. This would allow a more accurate assessment of the collision risk and barrier effects on birds breeding in the Caithness and Sutherland Peatlands SPA. RSPB understand there are likely to be high-cost implications of this and recommend that other developers across the Flow Country are contacted to collaborate as this issue has been raised in RSPB Scotland responses to several proposals in the area.			
	RSPB14	Raptor Surveys	In Section 8.2.33 of the SR for Hen Harrier roosting surveys it is stated that "Survey locations were selected based on records identified during the desk-based study and where potential roost sites were identified during flight activity or other bird surveys". RSPB are concerned that this will underestimate impact as only one dawn and one dusk survey was conducted at each VP in the autumn (Section 8.2.15), VPs did not cover 100% of the proposed development and no dedicated winter walkovers were conducted. In areas with suitable Hen Harrier roost habitat dedicated further surveys should be conducted.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Winter walk over surveys were undertaken in suitable habitat informed by the results of flight activity surveys and desk-based study to identify likely areas for use by Schedule 1a raptors during winter.
	RSPB15	Woodland Grouse Surveys	RSPB state that it is unclear from the Scoping report if the extent of Capercaillie surveys conducted up to date will be sufficient to inform the EIA. It is stated in Section 8.2.38 of the SR that for lekking Capercaillie "two surveys took place at pre-identified locations." The EIA should confirm these locations and the extent of the surveys conducted. From the information provided these appear to be two surveys of known leks and no further surveys of suitable habitat have been conducted.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	The scope of capercaillie surveys undertaken are set out in Volume 5, Appendix 9.1 and Appendix 9.3 . Consultation was undertaken with RSPBs Capercaillie officer in August 2023 and capercaillie data held by RSPB was purchased to inform this EIA.

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	RSPB16	Woodland Grouse Surveys	As stated by NatureScot guidance "Capercaillie use of woodland can change over time, with lek sites and brood areas changing location. It is necessary to have up-to-date information regarding any changes in order to ensure that planning decisions are as informed as possible." As shown by Section 8.3.31 of the SR in which signs of Capercaillie were discovered in Section E, Capercaillie can be found outside of known locations and protected sites.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	The scope of capercaillie surveys undertaken are set out in Volume 5, Appendix 9.1 and Appendix 9.3 . Consultation was undertaken with RSPBs Capercaillie officer in August 2023 and capercaillie data held by RSPB was purchased to inform this EIA.
	RSPB17	Woodland Grouse Surveys	RSPB stated that for Capercaillie, cold searches of all suitable habitat within the length of the proposed development are required to determine Capercaillie presence and lek distribution and size within the area of the proposed development. Suitable habitat includes both mature Scots pine forest, open canopy spruce and regenerating pine forests and bog woodland contained in both sections D and E. The area of section D closest to the Novar SPA including Glen Glass and Swordale is of concern.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	The scope of capercaillie surveys undertaken are set out in Volume 5, Appendix 9.1 and Appendix 9.3 . Consultation was undertaken with RSPBs Capercaillie officer in August 2023 and capercaillie data held by RSPB was purchased to inform this EIA.
	RSPB18	Woodland Grouse Surveys	Prior consultation with RSPB Scotland as per NatureScot's 2017 'Recommended bird survey methods to inform impact assessment of onshore windfarms' is recommended to prevent crossover, unnecessary disturbance and potential unnecessary repetition of surveys. These surveys should cover at least 1.5km from previously recorded lek sites.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	The scope of capercaillie surveys undertaken are set out in Volume 5, Appendix 9.1 and Appendix 9.3 . Consultation was undertaken with RSPBs Capercaillie officer in August 2023 and capercaillie data held by RSPB was purchased to inform this EIA.
	RSPB19	Woodland Grouse Surveys	RSPB strongly recommend that the EIA clearly sets out details of survey methodology, including which surveys were conducted, where, and when. The RSPB Scotland's Capercaillie Advisory Officer, Helen Gray (helen.gray@rspb.org.uk), should also be consulted for further information on known active lek locations	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	The scope of capercaillie surveys undertaken are set out in Volume 5, Appendix 9.1 and Appendix 9.3 . Consultation was undertaken with RSPBs Capercaillie officer in August 2023 and capercaillie data held by RSPB was purchased to inform this EIA.

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			and advise on suitable habitat. If surveys to date do not cover all suitable habitat, further surveys will be required.			
	RSPB20	Information to be provided in the EIA	<p>RSPB recommend that information is provided within the EIA Report to demonstrate that the survey coverage and data meet NatureScot requirements, are robust and accurate, including:</p> <ul style="list-style-type: none"> • Full information on the VP work undertaken, including dates, times and weather conditions. • Maps showing diver, wader and raptor breeding, foraging and roosting areas. • Maps showing areas of high ornithological activity to single out for mitigation such as undergrounding and line marking. 	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Information on the survey coverage is presented in Volume 2, Chapter 9: Ornithology and Volume 5, Appendix 9.1 of this EIA Report and supporting figures. Scoping consultation responses from NatureScot are included.
	RSPB21	Barrier effects	<p>RSPB disagree with the statement in Section 8.5.2 of the SR in which barrier effects are scoped out of further assessment.</p> <p>RSPB state that although there are existing OHLs in proximity of the proposed development, these do not cover the entire length of the Proposed Development, nor are they at the same scale. Therefore, for those areas that currently don't have an OHL, the Proposed Development may act as a barrier. Additionally, even in those areas where there are existing OHLs, it is not clear if and when they will be replaced. Two parallel OHLs may further increase barriers to birds. Added to that, the proposed development is higher so could have a greater impact. There are also areas of the proposed development not covered by the single year of vantage point surveys, so a cautionary approach should be taken. Finally, due to the high volume of development in proximity of the proposed development, a cumulative assessment of barrier impacts should be assessed, especially for the SPAs.</p>	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Barrier effects have been considered, and a high-level assessment included in this EIA Report.

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	RSPB22	Barrier effects	As noted in Section 8.3.6 of the SR "Three identified goose roosts were situated in proximity to Section A of the Proposed Development. Pink-footed and Greylag geese as well as Whooper Swans were recorded in flight at risk-height or using roost sites." This OHL could be a barrier to these wintering goose populations. This should be assessed in the EIA.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Barrier effects have been considered, and a high level assessment is included in this EIA.
	RSPB23	Peat and Priority Peatland Habitats	RSPB state that according to the Carbon and Peatland Map 2016, much of the route passes through significant areas of Class 1 Nationally important carbon-rich soils, deep peat and priority peatland habitat, areas likely to be of high conservation value. RSPB are pleased that a peat depth survey will be undertaken (as described in Section 10.3.1 of the SR). RSPB state that the results from this should be used to minimise impacts on peat by helping to avoid areas deeper than 0.5m. RSPB state that routes that use existing infrastructure should also be considered as a way of reducing further damage to peat. In addition, horizontal directional drilling through bedrock should be considered for sensitive peatland habitats that cannot be avoided.	Annex A pages 80- 90	Volume 2, Chapter 11: Geological Environment	Detailed peat probing surveys have been carried out across the Proposed Development to establish peat depths, with additional data to allow for micro-siting in the iterative design process and to avoid areas of deep peat where possible. Appropriate mitigation and the results of these surveys are detailed in Volume 2, Chapter 11: Geological Environment, Volume 5, Appendix 11.1: Peat Slide Risk Assessment and Volume 5, Appendix 11.2: the Outline Peat Management Plan.
	RSPB24	Compensatory Planting	RSPB understand that compensatory planting may be required as a result of the Proposed Development (Section 14.4.2 of the SR). RSPB recommend the Applicant considers whether compensatory planting is required in areas of deep peat or whether an exception would apply as per Scottish Forestry guidance, regarding removal of woodland from deep peat. Guidance on this and consideration of peatland restoration instead would maximise any biodiversity enhancement. Any compensatory planting project should avoid important bird	Annex A pages 80- 90	Volume 2, Chapter 13: Forestry	Forestry guidelines will be applied when removing woodland from deep peat- Woodland removal for peatland restoration- Scottish Forestry 2022. The Forestry (Exemptions) (Scotland) Amendment Regulations 2021. Other guidelines to take into account are: "Deciding future management options for afforested deep peatland" Forestry Commission Scotland 2015.

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			populations of open habitats, survey and assessment will be required to determine these areas.			
	RSPB25	Cumulative impacts	<p>At points the proposed development runs in parallel with existing OHLs. The cumulative impact of this, on disturbance, displacement, barrier effects, collision and peatland impacts should be considered in the EIA.</p> <p>RSPB stated that a robust cumulative and in-combination assessment should include not just collision risk but also disturbance, displacement and barrier effects and should take account of all operational, consented, and proposed development schemes and land uses within planning that could impact on bird populations at the relevant NHZ and SPA scale. Considering this, Table 3.3, Section 3.6 included in the SR may be insufficient in scope.</p>	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	The cumulative assessment with the Proposed Development is presented in Volume 2, Chapter 9: Ornithology .
	RSPB26	Cumulative impacts	RSPB stated that cumulative impacts in relation to collision risk should be assessed, especially for Red and Black-throated Divers, Red Kite, Hen Harrier and Common Scoter, noting that Common Scoters are likely to fly at night.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	The cumulative assessment with the Proposed Development is presented in Volume 2, Chapter 9: Ornithology .
	RSPB27	Section A - Spittal to Brora	Section A is within the Caithness and Sutherland Peatlands Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site; designated for internationally important populations of birds and habitats. The proposed development has the potential to impact on several priority species some of which are features of the designated sites. Not only that, but this is an area of global importance, as shown by its recent inscription as a World Heritage Site. RSPB are disappointed by the inadequacy of the surveys conducted in the northern sections of this development. An area as important as this must be adequately surveyed to truly inform impact.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.

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	RSPB28	Section A - Spittal to Brora	Sections A1 and A1.1 of the proposal are within the UNESCO World Heritage Site. The Highland Council's Flow Country Candidate World Heritage Site Planning Position Statement, states that, developments within the zone of influence of the WHS, must be assessed utilising the UNESCO Impact Assessment Guidance Toolkit. Therefore, RSPB are pleased that this is being undertaken alongside the EIA (Section 7.9.1 of the SR).	Annex A pages 80- 90	Volume 2, Chapter 8: Ecology and Nature Conservation	A WHS assessment is undertaken for the Flow Country WHS. The assessment uses the THC toolkit, appended to the noted chapter (Appendix 8.11 WHS Toolkit)
	RSPB29	Section A - Spittal to Brora	In RSPB's public consultation response dated the 12th of May 2023 RSPB welcomed that the preferred route avoided the RSPB Forsinard Flows Reserve, however, in Table 8.2 of the SR it is stated that the proposed development is within the reserve boundary. RSPB state that this is unclear in the provided maps and should be clarified.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB30	Section A - Spittal to Brora	RSPB state that Section A1.1 overlaps with the boundaries of the proposed Ouglassy and Watten wind farms, as well as with the boundary of the Ayre offshore wind- onshore cabling. It is also adjacent to proposed Stemster windfarm. This limitation should be discussed in the EIA and these developments should be included in the cumulative impact assessment. Further to this RSPB suggest these developers are contacted for the ornithological data collected at these sites.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB31	Section A - Spittal to Brora	Section A1.1 is within the Caithness and Sutherland Peatlands SPA and WHS. RSPB state that from the information provided in the SR it seems that these protected areas have not been avoided because of the location of the Halsary, Causeymire and Bad a Cheo windfarms. This should be acknowledged in the assessment, especially the cumulative impact assessment.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.

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	RSPB32	Section A - Spittal to Brora	Section A1.5 Follows the existing OHL to Lothbeg, then from Lothbeg to the beginning of section B the proposed route crosses an undeveloped area. This includes an area of Class 1 peatland. RSPB state that peat depth and habitat surveys should be undertaken to determine best routing in this area.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB33	Section A - Spittal to Brora	RSPB state that the A1.6 alternative route does not follow the existing OHL, and as it crosses greater undeveloped land it is likely to have increased ornithological and peatland impacts. Surveys will be required to determine impacts.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB34	Section B - Brora to Loch Buidhe	RSPB's major concern for Section B is that B1 crosses both the Strath Carnaig and Strath Fleet Moors SPA and SSSI and the Dornoch Firth SPA. Due to the nature of the proposal and its location the EIA Report must include sufficient information to inform an Appropriate Assessment by the competent authority, as required by the Conservation of Habitats and Species Regulations 2017.	Annex A pages 80- 90	Volume 2, Chapter 8: Ecology and Nature Conservation Volume 2, Chapter 9: Ornithology	The potential effects on designated sites are discussed within the Volume 2, Chapter 8: Ecology and Nature Conservation and Volume 2, Chapter 9: Ornithology
	RSPB35	Section B - Brora to Loch Buidhe	RSPB stated that the Strath Carnaig and Strath Fleet Moors SPA, and underpinning SSSI, are designated for their breeding population of Hen Harriers. To avoid negatively impacting this designated feature of the SPA, careful consideration must be given to Hen Harriers along the length of this route. On the 5th of April 2024 RSPB responded to the request for scoping opinion for the Loch Buidhe 400kV Substation (24/00833/SCOP), many of RSPB's concerns outlined in that letter are relevant in the scoping response detailed here.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.

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	RSPB36	Section B - Brora to Loch Buidhe	From section A1.5 and B1 to Torboll and B1.1 to Kinnauld, the route deviates from the existing OHL. RSPB assume that this is to avoid the population centres of Brora and Golspie. However, RSPB state that by doing so, the OHL may have a more extensive impact on undeveloped land and will also cross through Loch Gorge SSSI (Which is included in Table 7.2 but not Table 7.4). The EIA should give this full consideration.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB37	Section B - Brora to Loch Buidhe	B1 follows the existing OHL, meaning it crosses both the Dornoch Firth SPA and Strath Carnaig and Strath Feet Moors SPA, which could mean two OHLs will run in parallel within the protected areas. Alternative route B1.1 avoids the Dornoch Firth SPA and follows an existing OHL from Kinnauld, but also crosses the Strathfleet SSSI. RSPB state that full justification for the selection of routes within the designated sites and an appraisal of alternatives that avoid these sites should be detailed in the EIA, including the cumulative impacts of two OHLs running parallel.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB38	Section B - Brora to Loch Buidhe	RSPB stated that as section B1 crosses Loch Brora, surveys should be conducted to determine impacts on wetland birds, this includes both barrier and collision on species crossing the loch.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB39	Section C - West of Dornoch	Section C is within the Strath Carnaig and Strath Fleet Moors SPA. RSPB stated that the impacts of this must be considered in the EIA. Section C also crosses the Kyle of Sutherland Marshes SSSI and River Oykel SAC. RSPB stated that the EIA should provide justification as to why designated sites are not being avoided.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.

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	RSPB40	Section C - West of Dornoch	Section C is within the site boundary of proposed Garvary Moor, Inveroykel and Balblair windfarms. RSPB stated that this limitation should be discussed in the EIA and these developments should be included in the cumulative impact assessment. Further to this RSPB suggest these developers are contacted for ornithological data from these sites.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB41	Section D - Dornoch to Dingwall	Section D1 is within the site boundary of the following proposed windfarms: <ul style="list-style-type: none"> Creachan, (ECU00005211) Ceislein (ECU00005174) and Abhainn Dubh (ECU00004732). 	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB42	Section D - Dornoch to Dingwall	Section D1.3 is within the site boundary of in-planning Fairburn Windfarm extension (ECU00004542). RSPB stated that these limitations should be discussed in the EIA and these developments should be included in the cumulative impact assessment. Further to this RSPB suggest developers of the above-mentioned windfarm proposals are contacted for ornithological data from these sites.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB43	Section D - Dornoch to Dingwall	RSPB stated that Capercaillie is of particular concern in this section. Capercaillie are a rare, Red Listed Bird of Conservation Concern. The most recent National Survey 21/22 showed the population had more than halved since the previous survey 6 years prior. Novar and Morangie SPAs form a significant metapopulation situated at the most northerly part of the current Capercaillie range in Scotland. Capercaillie are vulnerable to both collision and disturbance. Surveys must be sufficient to inform the EIA. Additionally, the area in which the proposed development passes through is already proposed for a number of wind farms and forest works. The cumulative pressure on	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.

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			what is already a small and declining population should be considered.			
	RSPB44	Section E - Dingwall to Beaully	Section E1 crosses the SSE Western Isle/Beaully transmission line and Section E1.1 is adjacent to the operational Fairburn Windfarm. RSPB state that this limitation should be discussed in the EIA and these developments should be included in the cumulative impact assessment. Further to this RSPB suggest these developers are contacted for ornithological data from these sites.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB45	Section E - Dingwall to Beaully	In RSPB's public consultation response dated the 12th of May 2023 RSPB stated concern that Section E is located in very close proximity to Loch nam Bonnach and that the proposed development would pass between this loch and Loch nan Eun. RSPB have also received emails of concern from members of the public with regard to the impacts of the proposal on this loch. RSPB stated that as birds will likely fly between these two lochs, the proposed line could create a collision risk, therefore surveys are required in this area. The data from these surveys should be provided in the EIA.		Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB46	Section E - Dingwall to Beaully	RSPB stated that Section E crosses areas of Ancient Woodland around Aultgowrie. The EIA should provide information on whether this area has been covered appropriately by surveys.	Annex A pages 80- 90	Volume 2, Chapter 9: Ornithology	Individual baseline and impact assessments for each Section of the Proposed Development are presented in Volume 2, Chapter 9: Ornithology of this EIA Report.
	RSPB47	Biodiversity Enhancement	The Scottish Government's Fourth National Planning Framework (NPF4) was adopted on 13 February 2023 and now forms part of the statutory development plan and should be a significant material consideration. NPF4 acknowledges that the climate and nature crises are intrinsically linked and recognises the importance of the planning system in tackling these issues. RSPB Scotland believes that developments should leave nature	Annex A pages 80- 90	Volume 2, Chapter 8: Ecology and Nature Conservation	Alongside the EcIA, a BNG report (Volume 5, Appendix 8.8) has been developed to identify and quantify value of the losses of habitats along the Proposed Alignment. Whilst the metric used to quantify and evaluate Net Gain of Biodiversity Units (BU) by SSEN Transmission is based on the DEFRA metric it has been adjusted to make it more relevant to habitats found in a Scottish context. The

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			<p>in a better state than before and welcomes the requirement in Policy 3 of NPF4 that all developments must deliver biodiversity enhancement. The proposal therefore needs to offer 'significant biodiversity enhancements' that can be 'secured within a reasonable timescale and with reasonable certainty' as required by policy 3iv) of NPF4.</p> <p>RSPB are pleased to read SSEN Transmission's Biodiversity Ambition (Section 1.3.1 of the SR). RSPB state that any plans need to clearly set out what elements are proposed as mitigation and/or compensation and what is considered enhancement.</p> <p>RSPB welcome the inclusion of enhancement in this proposal. However, RSPB do not believe that existing metrics (Section 7.10.1 of the SR including DEFRA's BNG metric for England), represent the best approach for determining the most appropriate focus and location of enhancement, because they aren't designed to protect and invest in Scotland's nature restoration priorities.</p> <p>RSPB Scotland believes that the best method to ascertain the most appropriate type and location of biodiversity enhancement is to use a qualitative approach, administered by ecological experts with an understanding of the ecology of the site. Using an EIA-like or ecological assessment process to assess the scale and value of biodiversity lost, the ecological context and the relevant opportunity for enhancement means that enhancement measures can be designed to maximise value. Enhancements must be measurable, with the required amount of enhancement being proportionate to the scale, impact, and duration of the development.</p>			BNG assessment has been undertaken by competent professionals with experience delivering BNG assessments on similar types of development.

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	Scottish Forestry (SF) SF01	Woodland Removal	<p>Scottish Forestry state that the first consideration for all woodland removal decisions should be whether the underlying purpose of the proposals can reasonably be met without resorting to woodland removal.</p> <p>Scottish Government's Policy on Control of Woodland Removal clearly sets out a strong presumption in favour of protecting Scotland's woodland resources. https://forestry.gov.scot/support-regulations/control-of-woodland-removal</p> <p>In line with Scottish Government's wider objective to protect and expand Scotland's woodland cover, applicants are expected to develop their proposal with minimal woodland removal. Woodland removal should be allowed only where it would achieve significant and clearly defined additional public benefits.</p> <p>The following criteria for determining the acceptability of woodland removal should be considered relevant to this application:</p> <ul style="list-style-type: none"> Woodlands with a strong presumption against removal: Only in exceptional circumstances should the strong presumption against woodland removal be overridden. Proposals to remove these types of woodland should be judged on their individual merits and such cases will require a high level of supporting evidence. Where woodland removal is justified, the Compensatory Planting (CP) area must exceed the area of woodland removed to compensate for the loss of environmental value. Woodland removal with a need for compensatory planting: Design approaches that reduce the scale of felling required and/or converting the type of woodland to another type (such as from tall conifer plantation to low-height, slow growing woodland), must be considered from the earliest 	Annex A pages 138 - 140	Volume 2, Chapter 13: Forestry	All forestry elements within the Proposed Development have been evaluated in accordance with NPF4 Policy 6: Forestry and aligned with the Scottish Government's Policy on Control of Woodland Removal. Additional factors, such as compensatory planting exceeding to woodland removed to compensate for the loss of environmental value, have been taken into consideration.

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			<p>stages, rather than removing the woodland completely. The purpose of any required CP is to secure, through new woodland on site (replanting) or off site (on appropriate sites elsewhere), at least the equivalent woodland-related net public benefit embodied in the woodland to be removed.</p> <p>National Planning Framework 4 - Policy 6 Forestry, Woodlands and trees identifies several themes that should be considered relevant to this application:</p> <p>b) Development proposals will not be supported where they will result in:</p> <p>i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;</p> <p>ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy;</p> <p>iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy;</p> <p>c) Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered.</p> <p>d) Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported where the enhancement and improvement of</p>			

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			woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design.			
	SF02	EIA Report	Scottish Forestry strongly recommend that Forestry has a dedicated and detailed chapter in the EIA report that addresses the policies set out in the scoping response letter. The chapter should include the impacts on all woodland types (commercial, native, non-productive)	Annex A pages 138 - 140	Volume 2, Chapter 13: Forestry	A specific assessment on forestry interests has been completed and included in Volume 2, Chapter 13: Forestry of this EIA Report. This also sets out compensatory planting requirements, where relevant.
	SF03	EIA Report Guidance	<p>Scottish Forestry request that a detailed description of woodland impacts in the EIA report will demonstrate how woodland loss is compensated for on like for like basis in terms of productivity and native woodland, and that it will also highlight where enhanced Compensatory planting is required as set out in the Control of Woodland Removal Policy.</p> <p>Scottish Government's policy on control of woodland removal: implementation guidance February 2019 https://forestry.gov.scot/support-regulations/control-of-woodland-removal provides guidance on the level and detail of information Scottish Forestry will expect within the EIA Report, to help them reach an informed decision on the potential impact of the proposed development. Detailed information on any compensatory planting proposals should also be provided.</p>	Annex A pages 138 - 140	Volume 2, Chapter 13: Forestry	A specific assessment on forestry interests has been completed and included in Volume 2, Chapter 13: Forestry of this EIA Report. This also sets out compensatory planting requirements, where relevant.
	SF04	UK Forestry Standard	<p>All felling, restocking and compensatory planting proposals must be compliant with the UK Forestry Standard. https://forestry.gov.scot/sustainable-forestry/ukfs-scotland</p>	Annex A pages 138 - 140	Volume 2, Chapter 13: Forestry	A specific assessment on forestry interests has been completed and included in Volume 2, Chapter 13: Forestry of this EIA Report. This also sets out compensatory planting requirements, where relevant.

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	SF05	Forestry Guidance	The applicant should note that any compensatory planting required as a result of the proposed development, may also need to be considered under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017. https://forestry.gov.scot/support-regulations/environmental-impact-assessment and should follow the process for preparing a woodland creation proposal, as set out in our guidance booklet: Woodland Creation Application Guidance. https://forestry.gov.scot/support-regulations/woodland-creation	Annex A pages 138 - 140	Volume 2, Chapter 13: Forestry	A specific assessment on forestry interests has been completed and included in Volume 2, Chapter 13: Forestry of this EIA Report. This also sets out compensatory planting requirements, where relevant. This report has taken into account the Forestry Regulations 2017 (Environmental Impact Assessment) and ensures that compensatory planting follows the guidance process for preparing new woodland creation.
	SF06	Felling	Any additional felling which is not part of the planning application will require permission from Scottish Forestry under the Forestry and Land Management (Scotland) Act 2018 (the Act). For areas covered by an approved Long Term Forest Plan (LTFP), the request for additional felling (and subsequent restocking) areas needs to be presented in the form of LTFP amendment. https://forestry.gov.scot/support-regulations/felling-permissions	Annex A pages 138 - 140	N/A	The Applicant acknowledges that any additional felling not included in the planning application will require permission from Scottish Forestry, as stipulated under the Forestry and Land Management (Scotland) Act 2018. For areas under an approved Long Term Forest Plan (LTFP), any requests for additional felling and subsequent restocking will be submitted as an amendment to the existing LTFP. The Applicant will check compliance with these regulations and will coordinate with Scottish Forestry to obtain the necessary permissions and approvals for any felling activities associated with the Proposed Development.
	Scottish Gas Networks (SGN) SGN01	Gas Network Pipeline	SGN stated that SGN do not have any High Pressure pipelines within the vicinity of the scoping opinion and as such would have no comment/objection.	Annex A pages 91-92	N/A	This has been noted.
	Scottish Environment	Pre-application engagement	SEPA would “especially welcome further pre-application engagement once initial peat probing, peat condition	Annex A pages 50-58	N/A	This has been noted.

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	Protection Agency (SEPA) SEPA01		assessment and habitat survey work has been completed and the layout developed further as a result."			
	SEPA02	Site layout	<ul style="list-style-type: none"> Each of the drawings requested must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, buildings, borrow pits, cabling, site compounds, laydown areas, storage areas and any other built elements. All drawings must be based on an adequate scale with which to assess the information. The layout should be designed to minimise the extent of new works on previously undisturbed ground and existing built infrastructure must be re-used or upgraded where possible. A comparison of the environmental effects of alternative locations of infrastructure elements may be required. 	Annex A pages 50-58	Volume 2, Chapter 3: Description of the Proposed Development Volume 2, Chapter 4: The Routeing Process and Alternatives	<p>Detailed drawings have been prepared and included in the noted chapters. All drawings have been prepared at an appropriate scale to facilitate accurate assessment of the information provided.</p> <p>Consideration has been given during the design process to design the site layout to minimise the extent of new works on previously undisturbed ground. Existing built infrastructure has been re-used or upgraded where practicable further details are provided in the noted chapters.</p>
	SEPA03	Water environment	<ul style="list-style-type: none"> The proposals should demonstrate how impacts on local hydrology have been minimised and the site layout designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors. The submission must include a set of drawings showing: <ul style="list-style-type: none"> a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses; b) A suitable minimum buffer around each loch or watercourse (please refer to SEPA Recommended Riparian Corridor maps). 	Annex A pages 50-58	Volume 2, Chapter 10: Water Environment	<p>The Applicant has demonstrated how impacts on local hydrology have been minimised and the site layout has been designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures have been proposed to protect any downstream sensitive receptors. This information is included in Volume 2, Chapter 10: Water Environment.</p> <p>The submission includes a set of drawings showing the requested details.</p> <p>All buffers have been changed from 50 m to the SEPA recommended riparian corridor for specific watercourses. This buffer is illustrated in Volume 3, Figure 10.2: Surface Watercourses and Waterbodies.</p>

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	SEPA04	Flood risk	<ul style="list-style-type: none"> Crossings must be designed to accommodate the 0.5% annual exceedance probability flows (with an appropriate allowance for climate change), or information provided to justify smaller structures. If it is considered the development could result in an increased risk of flooding to a nearby receptor, then a flood risk assessment (FRA) must be submitted. 	Annex A pages 50-58	Volume 2, Chapter 10: Water Environment	All watercourse crossings will accommodate the 0.5% annual exceedance probability (plus climate change) flows by following SEPA watercourse crossing good practice guide and SSEN's Watercourse Crossing GEMP. This is described further in Volume 5, Appendix 10.1 Schedule of Permanent Watercourse Crossings .
	SEPA05	Peat and peatland	<ul style="list-style-type: none"> It should be clearly demonstrated that the assessment has informed careful project design and ensured, in accordance with relevant guidance and the mitigation hierarchy in NPF4, that adverse impacts are first avoided and then minimised through best practice. The submission should include a series of layout drawings at a usable scale showing all permanent and temporary infrastructure, with extent of excavation required. These plans should be overlaid on the following: <ul style="list-style-type: none"> a) Peat depth survey showing peat probe locations, colour coded using distinct colours for each depth category. This must include adequate peat probing information to inform the site layout in accordance with the mitigation hierarchy in NPF4, which may be more than that outlined in the Peatland Survey –Guidance on Developments on Peatland (2017); b) Peat depth survey showing interpolated peat depths; c) Peatland condition mapping – the Peatland Condition Assessment photographic guide lists the criteria for each condition category and illustrates how to identify each condition category. 	Annex A pages 50-58	Volume 2, Chapter 11: Geological Environment	<ul style="list-style-type: none"> This EIA demonstrates that the Proposed Development has been designed in accordance with relevant guidance and the mitigation hierarchy. The submission includes a series of layout drawings showing all permanent and temporary infrastructure, with extent of excavation required. These plans have been overlaid on peat depth maps included in Volume 5, Appendix 11.1: Peat Slide Risk Assessment and Volume 5, Appendix 11.2 Outline Peat Management Plan. Peatland condition mapping is provided for the full extent of infrastructure. Layout drawings have been provided. Given the location of the infrastructure and the technical requirements it has not always been possible to avoid deep peat. Care has been taken to avoid the deepest areas of peat wherever practicable.

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			<p>The detailed series of layout drawings above should clearly demonstrate that development proposals avoid any near natural peatland and that all proposed excavation is on peat less than 1m deep.</p> <p>The layout drawings should also demonstrate that peat excavation has been avoided on sites where this is possible. On other sites where complete avoidance of peat and carbon rich soils is not possible then it should be clearly demonstrated that the deepest areas of peat have been avoided and the volumes of peat excavated have been reduced as much as possible, first through layout and then by design making use of techniques such as floating tracks.</p>			
	SEPA06	Outline Peat Management Plan (PMP)	The scoping response from SEPA details the information to be include in the Outline Peat Management Plan (PMP).	Annex A pages 50-58	Volume 2, Chapter 11: Geological Environment	<p>This information has been included in the Outline PMP, appended to the noted chapter.</p> <p>Volume 5, Appendix 11.2: Outline Peat Management Plan includes details of all peat excavation volumes and restoration. In addition, the Outline PMP includes details of temporary storage.</p>
	SEPA07	GWDTE and existing groundwater abstractions	The layout and design of the development must avoid impacts on Groundwater Dependent Terrestrial Ecosystems (GWDTE) which are protected under the Water Framework Directive.	Annex A pages 50-58	<p>Volume 2, Chapter 10: Water Environment</p> <p>Volume 2, Chapter 8: Ecology and Nature Conservation</p>	Impacts on GWDTE have been assessed in the noted chapters.
	SEPA08	National Vegetation	A NVC survey should be submitted which includes the following information:	Annex A pages 50-58	Volume 2, Chapter 8:	Volume 2, Chapter 8: Ecology and Nature Conservation addresses issues in respect to Ecology

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		Classification (NVC) survey	<p>a) A set of drawings demonstrating all GWDTE and existing groundwater abstractions are out with a 100m radius of all excavations shallower than 1m and out with 250 m of all excavations deeper than 1m and proposed groundwater abstractions. The survey needs to extend beyond the site boundary where the distances require it.</p> <p>b) If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice and the minimum information we require to be submitted.</p> <p>Please note that due to discrepancies in habitat definition and ambiguity in correspondence with NVC types we do not accept the use of The UK Habitat Classification System (UKHab) as an alternative to NVC.</p>		Ecology and Nature Conservation	<p>and Nature Conservation, primarily GWDTEs in respect to SEPAs area of interest.</p> <p>Through the routing selection process (Volume 2, Chapter 4: The Routing Process and Alternatives) and into the post consent detailed design, SSEN Transmission work to minimise the impacts of development on the environment balanced against constructability and safety issues. GWDTEs form part of the environmental assessment.</p> <p>SEPA LUPS Guidance Note 31² has been used in respect to groundwater, to determine impacts up to 250 m from the LoD, assumed to be 100 m either side of the Proposed Alignment, this is further detailed within Volume 5, Appendix 8.2: Assessment Methodology which has been written in cognisance of the relevant points listed in Appendix 1 of SEPA's scoping response.</p>
	SEPA09	Forest removal and forest waste	<ul style="list-style-type: none"> If forestry is present on the site, the site layout should be designed to avoid large scale felling, as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality. The submission must include drawings with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS. 	Annex A pages 50-58	Volume 2, Chapter 13: Forestry	<p>The Applicant has sought to minimise felling where possible.</p> <p>The submission includes drawings with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS.</p> <p>The Applicant will seek to manage and minimise waste in line with the waste hierarchy. Should there be any waste arising from the construction of the Proposed</p>

²Land Use Planning System SEPA Guidance Note 31 <https://www.sepa.org.uk/media/144266/lups-gu31-guidance-on-assessing-the-impacts-of-development-proposals-on-groundwater-abstractions.pdf>

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						Development this would be treated in line with the prevailing waste regulations.
	SEPA10	Pollution prevention and environmental management	The submission must include a schedule of mitigation, which includes reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils and peat at any one time) and regulatory requirements.	Annex A pages 50-58	Volume 2, Chapter 19: Schedule of Mitigation	The submission includes a schedule of mitigation in Volume 2, Chapter 19: Schedule of Mitigation , referencing to best practice pollution prevention and construction techniques and regulatory requirements.
	The Highland Council (THC) THC01	Description of the Development	<p>THC stated that the description of development for the EIAR must include:</p> <ul style="list-style-type: none"> a. a description of the physical characteristics of the whole development and the full land-use requirements during the operational, construction and decommissioning phases, including details of any redundant overhead line infrastructure to be removed. Irrespective of the application site boundary, or works to be consented under different regulatory regimes, or authorised under permitted development rights, these must include the totality of the development, including but not limited to, project critical infrastructure such as road improvement works, connections, woodland, habitat and water management, etc. A plan with eight figure OS Grid coordinates for all main elements of the proposal should be supplied; b. a description of the main characteristics of the production processes, for instance, nature and quantity of the materials used; c. the risk of accidents, having regard in particular to substances or technologies used; 	Annex A pages 1-28	<p>Volume 2, Chapter 3: Description of the Proposed Development</p> <p>Volume 2 Technical Chapters</p> <p>Volume 2, Chapter 19: Schedule of Mitigation</p>	<p>The Description of the Proposed Development chapter details the specific elements of the Proposed Development. The following confirms where each point listed in THC's response has been addressed:</p> <ul style="list-style-type: none"> a. Proposed Development chapter. b. Proposed Development chapter. c. The potential for accidents and disasters is discussed in the Scope and Consultation chapter, confirming that crisis management and continuity plans are in place across the SSE Group to respond to such events. d. This is discussed in relevant chapters of this EIA Report. e. The potential for cumulative impacts is considered within each technical chapter of this EIA Report, where relevant. f. Mitigation measures are proposed at the end of each technical chapter. A consolidated Schedule of Mitigation is presented in Volume 2, Chapter 19: Schedule of Mitigation in this EIA Report.

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			<ul style="list-style-type: none"> d. an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the development; e. the estimated cumulative impact of the project with other consented or operation development, including those to be connected and served by the proposed development, as well as the upgrading of connecting substation infrastructure irrespective of these projects undergoing a separate consenting regime; and f. a detailed schedule of mitigation. 			
	THC02	Limits of Deviation	<p>The Scoping Report Section 2.5 suggests that the proposed development would incorporate a 100 m Limit of Deviation (LOD) either side of the preferred alignment to allow for refinement in the horizontal alignment of the line, but also its vertical height. The intended vertical LOD limit is unspecified at this stage, however, THC strongly encourage that this is designed to be no greater than 10% higher for any particular proposed OHL tower to ensure that the EIAR undertaken remains accurate and the proposal can be adequately assessed.</p> <p>The application must therefore make clear the existing and proposed site levels in mAOD for all proposed towers, with this to be detailed on EIA drawings using a detailed map based of 1:25,000 or 1:50,000.</p>		Volume 2, Chapter 3: Description of the Proposed Development	<p>The vertical LoD allows a height increase or decrease of up to 9 m on the proposed tower height presented within Volume 5, Appendix 3.1: Indicative Tower Schedule. The 9 m variation is consistent with the extension panels to which steel lattice towers are designed (i.e. in 3m lengths), and therefore any increase or decrease of steel lattice towers would be no greater than 9 m (equivalent to 3 x 3m panel extensions).</p> <p>The submission includes detailed drawings.</p>
	THC03	Limits of Deviation	<p>The proposed 100m horizontal LOD is also expected to be refined downwards for each section of the line, as this is a particularly wide corridor to assess, and again, it is expected that in most instances this can be significantly reduced. THC therefore expect the EIA and application to specify each tower</p>		Volume 2, Chapter 3: Description of the Proposed Development	<p>The LOD presented is required to enable design flexibility in the current absence of ground investigation work. In some areas, the LoD is increased or decreased to account for local constraints or known engineering challenges and environmental sensitivities. Further</p>

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			position, design type, and height, with a commitment being made that it would not be micro-sited beyond 50m on the horizontal axis. A specific micro-siting mitigation table for each numbered tower is expected to be required, specifying where this suggested 50m limit needs to be refined downward to respect nearby environmental / receptor constraints. Similarly, whilst reporting the average height of each tower (57m) is a helpful indication, details of each specified tower height will be required, along with the connecting cable clearance heights for road / watercourse crossing.			information is provided in Volume 2, Chapter 3: Description of the Proposed Development . The tower position, design type, and heights are presented within Volume 5, Appendix 3.1: Indicative Tower Schedule .
	THC04	Limits of Deviation	THC stated that in refining the LOD, the wayleave corridor required should also be considered and specified within the project's description of development. Owing to the design height of the towers, scope should be included for planting proposals within this corridor to reduce the extent of potential landscape and visual impacts, but also to maximise habitat enhancement and compensatory planting.		Volume 2, Chapter 3: Description of the Proposed Development	The location of forestry and woodland has been considered in the location of the horizontal LOD. Further information is provided in Volume 2, Chapter 13: Forestry .
	THC05	Ancillary Development	THC stated that alongside the development of the OHL itself, the applicant is strongly encouraged to incorporate all ancillary works within the S37 application, with this to include any works which would benefit from permitted development rights and other development which would otherwise require a subsequent permission under the Town and Country Planning Act, such as for new junctions and temporary remote compounds / laydown areas, and any borrow pits, as well as works associated with the rationalisation of transmission infrastructure such as the removal of existing overhead lines.		N/A	All elements of the Proposed Development for which sufficient design certainty is available are included in the Section 37 application.
	THC06	Alternatives	THC requested a statement outlining the main development alternatives studied by the applicant and an indication of the		Volume 2, Chapter 4: The Routeing	A description of the route and alignment selection stage of the Proposed Development, together with other alternatives considered during the EIA process, are

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			<p>main reasons for the final project choice. This is expected to highlight the following:</p> <ul style="list-style-type: none"> the range of technologies that may have been considered; locational criteria and economic parameters used in site selection; options for access; including construction laydown areas and staff / contractors accommodation compounds; design and locational options for all elements of the proposed development, including full consideration of any sections of the line which could be undergrounded or via subsea cable; consideration given to minimising temporary or permanent access tracks, with scope for the delivery of materials by helicopter for select sections of the line where access is challenging without giving rise to adverse landscape and visual effects, such as within designated landscape areas including regionally important Special Landscape Areas; and the environmental effects of the different options examined. Such assessment should also highlight sustainable development attributes including for example assessment of carbon emissions. A full and detailed evaluation of all options considered, rather than a summary, is required. 		Process and Alternatives	included in Volume 2, Chapter 4: The Routeing Process and Alternatives.
	THC07	Environmental Elements Affected	The EIAR must provide a description of the aspects of the environment likely to be significantly affected by the development.		Throughout this EIA Report	Noted throughout this EIA Report where required.

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	THC08	Environmental Elements Affected	THC stated that there is extensive transmission infrastructure in the wider area, and the applicant is encouraged to use understanding of these assets in assessing the environmental baseline, the effects of the development and the potential for cumulative effects to arise. The EIAR should fully utilise this understanding to ensure that information provided is relevant and robustly grounded.		Throughout this EIA Report	The Applicant has used their understanding of transmission infrastructure assets in the design of the Proposed Development and in the preparation of this EIA Report.
	THC09	Land Use and Policy	The EIAR should recognise the existing land uses affected by the development having particular regard for THC's Development Plan inclusive of all statutorily adopted Supplementary Guidance (SG). This is not instead of but in addition to the expectation of receiving a Planning Statement in support of the application itself. The purpose of this EIA chapter is to highlight relevant policies not to assess the compatibility of the proposal with policy. The scope of the EIA should, however, address all the relevant issues covered within NPF4, HwLDP, Caithness and Sutherland Local Development Plan (CaSPlan), Inner Moray Firth Local Development Plan 2 (IMFLPD2) and Highland Council Supplementary Guidance.		Throughout this EIA Report Planning Statement	These policy documents are referenced where appropriate throughout this EIA Report and the Planning Statement.
	THC10	Land Use and Policy	The Highland Council Development planning team acknowledged that the Scoping Report planning policy section (section 5) is not comprehensive and suggested that future documentation list, interpret, and apply all relevant NPF4 policies, specifically policies 1, 2, 3, 4, 5, 6, 7, 11, 13, 14, 18, 20, 22, 23, and 25. Section 5 (Local Planning Policy) solely refers to the Highland Wide Local Development Plan 2012; nevertheless, the Caithness and Sutherland LPD and Inner Moray Firth LPD 2 should be included. The IMFLDP2 contains general policies which provide more detail and/or clearer policy than NPF4 on		Throughout this EIA Report Planning Statement	These policy documents are referenced where appropriate throughout this EIA Report and the Planning Statement which accompany this EIA Report.

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			certain matters such as biodiversity, greenspace, green networks and infrastructure first, because they are later in date these will prevail over those in NPF4 in the case of alleged or actual incompatibility.			
	THC11	Land Use and Policy	<p>The Council has recently commenced the preparation of a new-style Highland Local Development Plan (HLDP), with the intention to undertake the evidence-gathering stage of the new LDP throughout 2023, with the tentative programme including an Evidence Report in 2024 and subsequent Gate Check, with Proposed Plan stage in 2025. Once adopted this modern style HLDP will supersede and replace HwLDP and the Council 'area' LDP. The programme of work includes the review of the coverage and content of its current suite of Supplementary Guidance, to establish which aspects should be covered within the new Local Development Plan itself, which aspects should be covered within non-statutory planning guidance and any aspects no longer required.</p> <p>Applicants are advised to monitor the Council's annual Development Plans Newsletter, as this provides the most up to date timetable for this work. The latest version was approved by the Council's Economy and Infrastructure Committee on the 2 February 2023 (Item 15) and is available on the Council Development Plans webpage.</p>		N/A	This has been noted.
	THC12	Land Use and Policy	<p>THC stated that Developer Contributions, Community Benefit and Community Wealth Building will all need to be considered as the scheme develops. Benefits to rural areas, such as provision of jobs and opportunities to restore and protect natural habitats, are also highlighted in Scottish Government Policy documents. Developer Contributions may be required towards transport (including active travel), green infrastructure, water and waste</p>		N/A	The Applicant has ensured Community Benefit and Community Wealth Building has been considered as the scheme has developed.

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			and public art / realm, in compliance with NPF4 Policy 18 (Infrastructure first), HwLDP Policy 31 (Developer Contributions) and Developer Contributions Supplementary Guidance (2018).			
	THC13	Land Use and Policy	<p>THC made reference to the Council's separate remit to promote community benefit which is distinct and separate from planning. The Council's position with regard community benefits has recently been updated with the approval of a new 'Social Values Charter for Renewables Investment' at its meeting on 27 June 2024, with the report available at the following link:</p> <p>https://www.highland.gov.uk/meetings/meeting/5003/highland_and_council</p> <p>The approved charter sets out The Highland Council's expectations from developers wishing to invest in renewables in the Highland area and what the Highland partnership – public, private, and community – will do to support and enable this contribution, namely:</p> <ul style="list-style-type: none"> • embed an approach to community wealth building into Highland; • maximise economic benefits from our natural environment and resources; • engage and involve relevant stakeholders to understand how we can continually improve our impact; and, • unlock economic opportunities for the area 		N/A	This has been noted. The Applicant has reviewed and considered the 'Social Values Charter for Renewables Investment'.
	THC14	Land Use and Policy	<p>Community Wealth Building is intended to encourage, promote, and facilitate a new strategic approach to economic development as set out in NPF4 Policy 25. This Policy indicates examples of what contributions by development proposals to community wealth building could include: improving community resilience and reducing inequalities; increasing spending within</p>		N/A	This has been noted and the Applicant has engaged with the relevant people within THC.

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			communities; ensuring the use of local supply chains and services; local job creation; supporting community led proposals, including creation of new local firms and enabling community led ownership of buildings and assets. However, that is not an exhaustive list. The document contains contacts for further discussion on this matter and THC encourage the developer to engage early in the process.			
	THC15	Sustainability	The Council's Sustainable Design Guide SG provides advice and guidance on a range of sustainability topics, including design, building materials and minimising environmental impacts of development. A Sustainable Design Statement is required. The Council also needs to fully understand the detailed design parameters of the infrastructure proposed, such as scale and appearance, and it would be beneficial to have information to explain the specific electricity network benefits and capacity. In this regard, the EIA needs to consider the impact of the installation, the electricity generating capacity the infrastructure is intended to serve, the planned generating source (including an estimate breakdown of onshore and offshore), and the prospective long-term use of the energy transmitted. The application should include a statement on how the development is likely to contribute to achieving net zero, but also Scottish Government Energy Efficient Scotland roadmap and provide the Highlands and UK with secure, and clean, electricity supplies. It should also be made clear if any part of the project would be capable of being delivered in isolation, or that it has been designed to be served by a suite of grid infrastructure upgrades; being prescriptive about which associated connections or other substation upgrades would be integral to the decision to progress with the development.		Planning Statement	Sustainable design principles are discussed within the Planning Statement that accompany this EIA Report.

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	THC16	Landscape and Visual	<p>The Council expects the EIAR to consider the landscape and visual impact of the development. The Council makes a distinction between the two. While not mutually exclusive, these elements require separate assessment and therefore presentation of visual material in different ways.</p> <p>It is the Council's position that it is not possible to use panoramic images for the purposes of visual impact assessment. The Council, while not precluding the use of panoramic images, require single frame images with different focal lengths taken with a 35mm format full frame sensor camera – not an 'equivalent.' The focal lengths required are 50mm and 75mm. The former gives an indication of field of view and the latter best represents the scale and distance in the landscape, i.e., a more realistic impression of what we see from the viewpoint. These images should form part of the EIAR and not be separate from it.</p> <p>Photomontages should follow the Council's Visualisation Standards and are subject an independent verification check upon receipt:</p> <p>https://www.highland.gov.uk/downloads/file/12880/visualisation_standards_for_wind_energy_developments</p> <p>The following are minimum requirements for the printed copies:</p> <ul style="list-style-type: none"> • For hard copies - Visuals should be presented in their own bound version of the document. • The first image should clearly set out the location of the viewpoint and directions on how to get there (as per figure 2 of the Standards). • The second page should include a photomontage presented at A3 with a 50mm field of view for landscape assessment (as per figure 6 of the Standards). 		Volume 2, Chapter 7: Landscape and Visual	<p>Volume 2, Chapter 7: Landscape and Visual has considered and assessed the subjects of landscape and visual amenity separately.</p> <p>Single frame images with different focal lengths have been taken with a 35mm format full frame sensor camera (focal lengths required are 50mm and 75mm). These images form part of this EIA Report.</p> <p>The Applicant acknowledges the minimum requirements for printed copies of the images detailed in the THC scoping response.</p>

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			<ul style="list-style-type: none"> The third page should include a baseline photograph at 50mm field of view and wirelines at the same scale as per Figure 7 or Figure 8 of the Standards). The fourth page should include a 50mm image photomontage (as per figure 10 of the Standards). The fifth page should include a 75mm image photomontage for assessment of visual impacts (as per figure 12 of the Standards). <p>The document requires to be printed single sided with a high-quality laser printer or equivalent on photo quality paper</p>			
	THC17	Landscape and Visual	<p>THC suggest that photomontages should be prepared to Highland Council Standards.</p> <p>Separate volumes of visualisations should be prepared to both Highland Council Standards and NatureScot guidance. These should be provided in hard copy and request that for THC's volume, these are provided in an A3 ring bound folder for ease of use.</p>		<p>Volume 2, Chapter 7: Landscape and Visual</p> <p>Volume 4: Visualisations</p>	<p>Photomontages to assist with the assessment and determination of this EIA have been produced in accordance with NS guidance and THC guidance and have been included in separate volumes of this EIA Report. It covers all relevant impacts of all elements of the Proposed Development.</p> <p>As per THC's request these will be provided in an A3 hard copy.</p> <p>The visual assessment has been receptor-based and has considered all potential receptors within the study area rather than a small number of viewpoints, providing a more detailed and robust assessment.</p> <p>The visualisations are illustrative of the type of view that would be obtained and are considered fully representative of visual receptors using the study area.</p>
	THC18	Landscape and Visual	<p>All elements of a development are important to consider within any EIAR and the assessment must include the expected landscape and visual impact of all structures, access roads, temporary cranes / compounds, laydown areas, soil and</p>		Volume 2, Chapter 7:	<p>The noted chapter has considered the impacts of all elements associated with the Proposed Development.</p>

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			overturned stores, fencing etc. All elements of the proposal are to be rendered into photomontages.		Landscape and Visual	
	THC19	Landscape and Visual	The finalised list of Viewpoints (VP) and wireframes for the assessment of effects of a proposed development must be agreed in advance of preparation of any visuals with THC and NatureScot. THC's Landscape and Planning Officers have not provided any comments at the scoping stage.		N/A	NatureScot and THC have been consulted re proposed viewpoints. NatureScot have responded, and additional sites have been included. THC have not responded.
	THC20	Landscape and Visual	THC acknowledge that there will be some micro-siting of the viewpoints to avoid intervening screening of vegetation boundary treatments etc. THC recommend that the photographer has in their mind whether the VP is representative or specific and also who the receptors are when they are taking the photos it would be helpful. THC have also found that if the photographer has a 3D model on a laptop when they go out on site it helps the orientation of the photography. Care should also be taken when undertaking the baseline photography in appropriate weather conditions, and during months of the year when visibility is not excessively obscured by intervening vegetation / deciduous trees being full leaf to ensure that the worst case scenario is accurately captured in the LVIA. Production of Zone of Theoretical Visibility (ZTV) and route analysis considering the nature and type of intervening trees, woodland, with further consideration given to woodland management plans and committed felling and planting cycles is also required.		Volume 2, Chapter 7: Landscape and Visual	THC's recommendations have been considered while undertaking the visual photography.
	THC21	Landscape and Visual	THC stated that the detailed location of viewpoints will be informed by site survey, mapping and predicted ZTVs and should be selected in order to show the proposal from as an open viewpoint as possible. Failure to do this may result in abortive work, requests for additional visual material and delays in processing applications/consultation responses. Community		Volume 2, Chapter 7: Landscape and Visual	The Applicant confirms that the location of viewpoints has been informed by site survey, mapping and predicted ZTVs and have been selected in order to show the proposal from as an open viewpoint as possible.

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			Council's may request additional viewpoints, and it would be recommended that any pre-application discussions with the local community, and associated reporting on consultation undertaken, takes this into account. Specifically, Brora Community Council have sought to be consulted on the local Viewpoint selection when the final OHL application route is decided prior to work on the LVIA, with consideration given to the suitability of including assessment of limited bespoke longer distance views from receptors at Brora, Embo and Dornoch.			
	THC22	Landscape and Visual	THC stated that the purpose of the selected and agreed viewpoints shall be clearly identified and stated in the supporting information. For example, it should be clear that the VP has been chosen for landscape assessment, or visual impact assessment, or cumulative assessment, or sequential assessment, or to show a representative view, or for assessment of impact on designated sites, communities, or individual properties. However, it is important for assessors to remember that Visual Effects are defined by GLVIA3 not just as effects on views, but as 'Effects on specific views and on the general amenity experienced by people'.		Volume 2, Chapter 7: Landscape and Visual	The purpose of the selected and agreed viewpoints is clearly identified in Volume 2, Chapter 7: Landscape and Visual and supporting information. It's noted that Visual Effects are defined by GLVIA3 not just as effects on views, but as 'Effects on specific views and on the general amenity experienced by people'.
	THC23	Landscape and Visual	THC stated that the LVIA Chapter of the EIAR should also clearly set out the methodology including: <ul style="list-style-type: none"> Definitions of each point on the scale of magnitude of change which is used by the applicant in reaching a conclusion on the magnitude of change. Definitions of each point on the scale of sensitivity of receptor which is used by the applicant in reaching a conclusion on the sensitivity of receptor. 		Volume 2, Chapter 7: Landscape and Visual	The LVIA has been carried out in accordance with best practice guidance 'The Guidelines for Landscape and Visual Impact Assessment (GLVIA3)' and criteria used has been in accordance with this guidance in terms of identification and presentation of significant effects.

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			<ul style="list-style-type: none"> The threshold to which the applicant considers a significant effect is reached. For the avoidance of doubt the Council consider that Moderate impacts can be significant, and it is recommended that the EIAR takes this approach as well. <p>A clear matrix approach supported by descriptive text setting out how you have reached your conclusion of effect on landscape character, designated landscapes, visual receptors, and residential amenity. The LVIA should contain an assessment of singular and cumulative effects for each of the representative viewpoints (as opposed to grouped receptors) following this methodology. This approach is important because the logic of the applicant's assessment must be clearly and readily understood. For key routes where there is shown to be prolonged sections of theoretical visibility towards the site, these should be subject of sequential route analysis, with provision of baseline photography at regular intervals, together with wireframes of the proposed development.</p>			
	THC24	Landscape and Visual	THC requested that when assessing the impact on recreational routes to ensure that all core paths, rights of way, national cycle network, and long-distance trails are assessed. It should be noted that these routes are used by a range of receptors.		Volume 2, Chapter 7: Landscape and Visual Volume 2, Chapter 14: Traffic and Transport	Volume 2, Chapter 7: Landscape and Visual and Volume 2, Chapter 14: Traffic and Transport considers impacts on recreational routes. Volume 5, Appendix: 16.1: Outdoor Access Management Plan outlines the approach to minimising negative impacts on potential interactions between construction traffic recreational routes.
	THC25	Landscape and Visual	THC expect that the LVIA assesses the impacts on any landscapes designated at a national and local scale.		Volume 2, Chapter 7: Landscape and Visual	The noted chapter considers impacts on designated landscapes including National Scenic Areas and Special Landscape Areas.

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	THC26	Landscape and Visual	THC requested separate to the production of the EIAR and LVIA, owing to the development being of national scale, a 3D flythrough of the project covering key routes and receptors is also required for presentation to committee, with the scope and content of this to be developed with Council officers. As with previous SSEN projects this material is expected to demonstrate the short term and longer-term impacts of the development post establishment of intervening proposed landscaping. Additionally, for select viewpoints there may be scope to utilise The Highland Council's Panoramic Viewer to best capture the horizontal nature of the development. This can be considered at the application stage ahead of committee.		N/A	A 3D flythrough of the Proposed Development is available and has been used to inform consultation. The 3D model has been made available to THC. Use of The Highland Council's Panoramic Viewer has been considered at the application stage ahead of committee.
	THC27	Ecology and Ornithology	THC noted that the EIAR should provide a baseline survey of the bird and animals (mammals, reptiles and amphibians etc.) interest on site.		Volume 2, Chapter 8: Ecology and Nature Conservation Volume 2, Chapter 9: Ornithology	The relevant ecological and ornithological baseline survey results and associated assessments are presented in Volume 2, Chapter 8: Ecology and Nature Conservation and Volume 2, Chapter 9: Ornithology
	THC28	Ecology	THC noted that the EIAR should provide an account of the habitats present on the proposed development site. It should identify rare or threatened habitats, and those protected by European or UK legislation, or identified in national or local Biodiversity Action Plans (BAPs).		Volume 2, Chapter 8: Ecology and Nature Conservation	Detailed results from UKHab and NVC surveys and associated target notes (including for notable species) are summarised in the noted chapter. Results from surveys have been used to inform the iterative design process and avoid or minimise impacts on sensitive habitats where practicable.
	THC29	Ecology	Habitat enhancement and mitigation measures should be detailed. Details of any habitat enhancement programmes (such as native-tree planting, stock exclusion, etc.) for the proposed		Volume 2, Chapter 8: Ecology and	Habitat enhancement and mitigation is considered within Chapter 8: Ecology and Nature Conservation of this EIA Report or appendices associated with these chapters.

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			site should be provided. It is expected that the EIAR will address whether or not the development could assist or impede delivery of elements of relevant Biodiversity Action Plans.		Nature Conservation	An Outline Habitat Management Plan (HMP) has also been included as an annex to Volume 5, Appendix 8.8: BNG Report . More detailed information on necessary mitigation and enhancement will be provided at a later stage based on information available post-submission of this EIA Report. This is due to the requirement for landowner agreement which will be clarified and confirmed in the applicable chapter of this EIA Report as appropriate. SSEN Transmission's SPPs are included in Volume 5, Appendix 3.4 .
	THC30	Ecology	THC stated that an ecological impact assessment for the site and should be considered alongside the development EIAR. This should follow the CIEEM guidance on ecological impact assessment and be proportionate to the scale of development. It should cover the ecological resources of the site including protected species within the Highlands Nature Biodiversity Action Plan. It is expected that the proposal shall demonstrate compliance with NPF4 Policy 3b and that using the DEFRA metric, a minimum of 10% of biodiversity enhancement overall, can be brought about.		Volume 2, Chapter 8: Ecology and Nature Conservation	An ecological impact assessment has been carried out and presented in Volume 2, Chapter 8: Ecology and Nature Conservation . The Applicant is committed to incorporating BNG into their projects and a BNG assessment is included in Volume 5, Appendix 8.8: BNG Report .
	THC31	Ecology, Habitats and Ornithology	The Highland Council's Ecology Officer is pleased with the concerns identified in the EIA Scoping Report and agrees with the inclusion of international and nationally protected species. The EIAR should cover Highland Nature Biodiversity Action Plan species and habitats, as well as SBL species. The THC's ecology officer stated that the survey buffer for protected species should only include protected species and should not be limited to 30m. All surveys should adhere to the relevant NatureScot Standing Advice		Volume 2, Chapter 8: Ecology and Nature Conservation Volume 2, Chapter 9: Ornithology	Volume 2, Chapter 8: Ecology and Nature Conservation and Volume 2, Chapter 9: Ornithology sets out the baseline information and assesses impacts on international and nationally protected species including SBL and Highland Nature Biodiversity Action Plan species.

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			https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-standing-advice-and-guidance-documents Any relevant Species Protection Plans (SPPs) should be made available as part of the EIA report. It is expected that all survey information submitted with the application will be up to date (as per NatureScot professional guidance) and will include all areas of proposed construction, including areas considered temporary (e.g. site compounds).			
	THC32	Ecology, Habitats and Ornithology	NatureScot will lead on ecology / ornithology designations, priority peatland and protected species. However, the ecology officer agrees with the ornithological evaluations conducted and expects to see all relevant data given within the EIAR, including a flight map and a comprehensive collision assessment. The EIAR should also include any cumulative assessments for the proposal, taking into consideration any bigger projects that may affect the same ecological receptors. The EIAR should address the likely impacts on the nature conservation interests of all the designated sites in the vicinity of the proposed development. It should provide proposals for any mitigation that is required to avoid these impacts or to reduce them to a level where they are not significant.		Volume 2, Chapter 9: Ornithology	Flight activity of target bird species has been mapped based on the results of the vantage point surveys. NatureScot guidance on assessment of OHLs does not recommend undertaking collision risk modelling, so the assessment includes a qualitative assessment of collision risk and identifies areas of high flight activity where additional mitigation will be implemented. Impacts on designated sites and cumulative impacts have been assessed.
	THC33	Ecology	THC stated that the EIAR needs to address the aquatic interests within local watercourses, including downstream interests that may be affected by the development, for example increases in silt and sediment loads resulting from construction works; pollution risk / incidents during construction; obstruction to upstream and downstream migration both during and after construction; disturbance of spawning beds / timing of works;		Volume 2, Chapter 8: Ecology and Nature Conservation	This has been considered as part of the assessment in Volume 2, Chapter 8: Ecology and Nature Conservation . The Kyle of Sutherland District Salmon Fishery Board, Beaully District Fishery Board, Cromarty Firth Fishery Board, Brora District Salmon Fishery Board, Caithness District Salmon Fishery Board and Helmsdale District

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			and other drainage issues. The EIAR should evidence consultation input from the local fishery board(s) where relevant.			Salmon Fishery Board were consulted at scoping stage and their comments have been captured in this matrix.
	THC34	Ecology	THC noted that the EIAR should include a map and assessment of impacts upon GWDTE and buffers.		Volume 2, Chapter 8: Ecology and Nature Conservation Volume 2, Chapter 10: Water Environment	Details of the UKHab and NVC survey are presented in Volume 2, Chapter 8: Ecology and Nature Conservation , whilst an assessment on potential GWDTE is included in Volume 2, Chapter 10: Water Environment .
	THC35	Ecology	THC stated that if wild deer are present or will use the site an assessment of the potential impact on deer will be required. This should address deer welfare, habitats, and other interests.		Volume 2, Chapter 8: Ecology and Nature Conservation	The Proposed Development would not result in a significant loss of woodland habitats (or other upland habitats) that would support deer. Deer are not a legally protected (other than for animal welfare purposes and specific restrictions on shooting seasons etc.), notable or rare/ threatened species, and would therefore not be evaluated as an important ecological feature (IEF) for the purposes of ecological impact assessment. Although there may be some localised displacement during construction works of the Proposed Development, there is no potential for them to be significantly affected and therefore have been scoped out of detailed assessment.
	THC36	Ecology, Habitats and Ornithology	NPF4's commitment to deliver positive effects for biodiversity through development. Policy 3 states that, 'Development proposals for national, major and of EIA development should only be supported where it can be demonstrated that the proposal will conserve and enhance biodiversity, including		Volume 2, Chapter 8: Ecology and Nature Conservation	An Outline Habitat Management Plan (HMP) is included as an annex to Volume 5, Appendix 8.8: BNG Report . Volume 5, Appendix 3.4 Species Protection Plans (SPPs) is included within this EIA Report.

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			nature networks within and adjacent to the site, so that they are in a demonstrably better state than without intervention, including through future management.' A draft or outline Habitat Management Plan (HMP) and Species Protection Plan (SPP) should be produced as part of the EIA, including any proposals for mitigation and enhancement in relation to important habitats and species. Any compensatory planting plans should be carefully considered and included in the HMP. It is noted that the application will be supported by a Biodiversity Net Gain Metric, this is supported, and it is expected that any proposed enhancement to comply with NPF4 policy 3 and Highland Council 'Biodiversity Enhancement Planning Guidance' May 2024. The completed metric and any associated information used to populate the metric should be provided with the application.		Appendix 3.4 Species Protection Plans (SPPs)	The Applicant is committed to achieving BNG on their projects and a BNG assessment is provided in Volume 5, Appendix 8.8 BNG Report .
	THC37	Ecology, Habitats and Ornithology	SSE has a target for all projects gaining consent to achieve a minimum 10% net gain for biodiversity. NatureScot's Developing with Nature guidance has been prepared, in discussion with Scottish Government, to support major development applications. It sets out a number of common measures to enhance biodiversity. For national, major and EIA developments, more detailed assessment and more ambitious measures are likely to be required. The applicant should explore and identify opportunities for biodiversity enhancement as early as possible, including through discussion with key stakeholders. Within the EIA report, information on predicted losses, proposed compensation and delivery of additional positive effects should be clearly summarised. The information must be sufficient to allow the consenting authority and relevant stakeholders to see clearly how effects will be addressed, and compensation and enhancement delivered. Developers may wish to consider the		Volume 2, Chapter 8: Ecology and Nature Conservation	<p>The Applicant has reviewed NatureScot's Developing with Nature guidance.</p> <p>The Applicant has explored and identified opportunities for biodiversity enhancement as early as possible, including through discussion with key stakeholders.</p> <p>Within Volume 2, Chapter 8: Ecology and Nature Conservation of EIA report, information on predicted losses, proposed compensation and delivery of additional positive effects are clearly summarised.</p> <p>The Applicant has considered the simple template at Annex C of the Developing with Nature guidance: https://www.nature.scot/doc/developing-nature-guidance#annex-c </p>

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			simple template at Annex C of the Developing with Nature guidance: https://www.nature.scot/doc/developing-nature-guidance#annex-c			
	THC38	Geology, Hydrology and Hydrogeology , Soils	<p>THC stated that the EIAR needs to address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on water courses, water supplies including private supplies, water quality, water quantity and on aquatic flora and fauna.</p> <p>Impacts on watercourses, groundwater, other water features and sensitive receptors, such as water supplies, need to be assessed.</p> <p>Measures to prevent erosion, sedimentation or discolouration will be required, along with monitoring proposals and contingency plans. Assessment will need to recognise periods of high rainfall which will impact on any calculations of run-off, high flow in watercourses and hydrogeological matters.</p> <p>The applicant is strongly advised at an early stage to consult SEPA as the regulatory body responsible for the implementation of the Controlled Activities (Scotland) Regulations 2005 (CAR), to identify license requirements and the extent of the information required by SEPA.</p>		Volume 2, Chapter 10: Water Environment	<p>This information is provided in Volume 2, Chapter 10: Water Environment and provided in Volume 5, Appendix 3.8: Outline CEMP.</p> <p>SEPA have been consulted at scoping stage and their comments have been captured in this matrix.</p> <p>Embedded mitigation to prevent erosion and sedimentation or discolouration is captured within the noted chapter.</p> <p>Measures to safeguard the water environment from construction including working in high rainfall conditions is set out in the noted chapter.</p> <p>SEPA have been consulted throughout the process.</p>
	THC39	Geology and Soils	<p>THC stated that the EIAR should include a full assessment on the impact of the development on peat, this should be in line with NPF4, Policy 5. The assessment of the impact on peat must include peat probing for all areas where development is proposed. The Council are of the view this should include probing not just at the point of infrastructure but also covering the areas of ground which would be subject to micro-siting limits / limits of horizontal deviation. SEPA are best placed to provide</p>		Volume 2, Chapter 11: Geological Environment	<p>Detailed peat depth surveys have been carried out across all proposed routes where peat is present to establish peat depths, with additional data to allow for micro-siting of infrastructure in the iterative design process and to avoid deep peat where possible. Results from these surveys are discussed in Volume 2, Chapter 11: Geological Environment.</p>

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			detailed advice on methodology for peat probing and the peat assessment.			SEPA have been consulted and their comments at Scoping stage are captured in this matrix.
	THC40	Geology and Soils	THC stated that the EIAR should fully describe the likely significant effects of the development on the local geology including aspects such as borrow pits, earthworks, site restoration and the soil generally including direct effects and any indirect. Proposals should demonstrate construction practices that help to minimise the use of raw materials and maximise the use of secondary aggregates and recycled or renewable materials. Where borrow pits are proposed the EIAR should include information regarding the location, size and nature of these borrow pits including information on the depth of the borrow pit floor and the borrow pit final reinstated profile.		Volume 2, Chapter 11: Geological Environment	The likely significant effects of the Proposed Development on the geology are discussed in Volume 2, Chapter 11: Geological Environment and construction practices will be discussed in full in the Construction Environmental Management Plan (CEMP). The location of borrow pits is currently unknown and they are not considered as part of this EIA Report.
	THC41	Geology, Hydrology and Hydrogeology, Soils	THC stated that if culverting should be proposed, then it should be noted that SEPA has a general presumption against modification, diversion or culverting of watercourses. Schemes should be designed to avoid crossing watercourses, and to bridge watercourses where this cannot be avoided. The EIAR will be expected to identify all water crossings and include a systematic table of watercourse crossings or channelising, with detailed justification for any such elements and design to minimise impact. The table should be accompanied by photography of each watercourse affected and include dimensions of the watercourse. It may be useful for the applicant to demonstrate choice of watercourse crossing by means of a decision tree, considering factors including catchment size (resultant flows), natural habitat and environmental concerns. Further guidance on the design and implementation of crossings can be found on SEPA's Construction of River Crossings Good Practice Guide.		Volume 2, Chapter 10: Water Environment Appendix 10.1 Schedule of Permanent Watercourse Crossings	The Proposed Development has been designed to avoid crossing watercourses, and to bridge watercourses where this cannot be avoided. Volume 2, Chapter 10: Water Environment and Appendix 10.1 Schedule of Permanent Watercourse Crossings of this EIA Report identify all water crossings and include a systematic table of watercourse crossings/channelising, with detailed justification for any such elements and design to minimise impact. The table is accompanied by photography of each watercourse affected where possible and includes dimensions of the watercourse.

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	THC42	Geology, Hydrology and Hydrogeology , Soils	THC made reference to SEPA's consultation response which refers the applicant to consider to their standing advice for major developments and notes SEPA's general agreement with the Scope of the EIA in relation to their interests. SEPA's further advice in relation geomorphic risk layer mapping, and flood risk mapping data should be reviewed by the applicant.		N/A	The Applicant has considered advice included in SEPA's consultation response.
	THC43	Geology, Hydrology and Hydrogeology , Soils	THC Flood Risk Management Team have confirmed that they have no further comments to make at this stage. It is anticipated that detailed comments will be provided on impacts on the water environment, in particular on buffers to water courses, by SEPA.		N/A	This has been noted.
	THC44	Private Water Supplies	THC stated that the need for, and information on, abstractions of water supplies for concrete works or other operations should also be identified. The EIAR should identify whether a public or private source is to be utilised. If a private source is to be utilised, full details on the source and details of abstraction need to be provided.		Volume 2, Chapter 10: Water Environment	The Applicant confirms that information on abstractions of water supplies for concrete works and other operations have been identified where relevant. This EIA Report identifies whether a public or private source is to be utilised (if any).
	THC45	Private Water Supplies	THC stated that the applicant will be required to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption. Highland Council has some information on known supplies, but it is not definitive. An on-site survey will be required. It is noted that the applicant intends to undertake consultation with supply owners and site visits where required.		Volume 2, Chapter 10: Water Environment	The presence of private water supplies along the alignment have been determined through consultation with The Highland Council, landowner questionnaires and site survey, and the likely impacts from the Proposed Development are set out in the noted chapter.
	THC46	Private Water Supplies	The EIA will require to include report which details of the measures proposed to prevent contamination or physical disruption of any water supplies. The report should include		Volume 2, Chapter 10:	Volume 2, Chapter 10: Water Environment details the measures proposed to prevent contamination or physical disruption of any water supplies. The report also includes

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			details of any monitoring prior to, during and following construction. It should also include proposals for contingency measures in the event of an incident.		Water Environment	details of any monitoring prior to, during and following construction.
	THC47	Contaminated Land	<p>Based on the details provided, THC's Contaminated Land officer has made a general comment, highlighting some of the potential concerns along various route options and are not a complete listing of all sites with potential for contamination. A detail response will be provided once site layout plan with red line boundary of the final route is determined.</p> <p>Option A:</p> <p>There are various small disused pits and quarries along this route, in particular around the Ousdale area and West Helmsdale. Also, the larger Banniskirk Quarry is located at NGR 316797 956806. Former pits and quarries could have been infilled with degradable/potentially contaminative materials which can be an issue in terms of ground gas generation and harm to health from contaminants present. There is a site of former military use at Crackaig, which could have potential issues such as asbestos or fuel storage. There is also a sheep wash at Crackaig, and there are potentially other sheep wash locations along the route which cross into the boundary of the application. Contaminants associated with sheep wash can be persistent within soils and groundwater.</p> <p>Option B:</p> <p>No potential issues were noted along Route B other than the presence of the existing Electricity Substation to the south of Loch Buidhe at the southern end of this route.</p> <p>Option C:</p> <p>No potential issues were identified along Route C.</p>		Volume 2, Chapter 11: Geological Environment	The comments from THC's Contaminated Land office have been noted and an assessment of contaminated land throughout the Proposed Development is included in Volume 2, Chapter 11: Geological Environment.

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			<p>Option D:</p> <p>There are small quarries within the Glen Glass area which may lie within the route boundary, and which may have been infilled with waste materials. There is a former Timber Yard/Sawmill at Achterneed, north of Strathpeffer where timber treatments could have taken place. Also noted are the existing Power Stations in the Strath Conon/ Loch Achonachie area.</p> <p>Option E:</p> <p>Torr Achilty Power Station is located at the head of Loch Achonachie. No other significant sites of concern are identified along this route.</p> <p>A further check of all routes once finalised should be undertaken on a more detailed scale to be able to provide a definitive list of all sites with a potential for contamination issues within the red line site boundary. Further comment could then be made as to what further actions are considered necessary in relation to the proposed development and infrastructure planned within that area.</p>			
	THC48	Construction Noise/vibration	<p>THC stated that in relation to construction noise, planning conditions are not usually used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. However, as proposed development will include significant construction works and sections of the OHL are in close proximity to noise sensitive properties, with one section being only 100 metres, there is potential for significant disturbance from construction noise.</p>		N/A	<p>Construction noise and vibration is assessed to BS 5228-1 and BS 5228-2 respectively.</p> <p>The construction programme requires working from 0700 – 1900 every day, although the majority of works are expected in daytime hours. Therefore, construction activities will be fully assessed to BS5228 using the 55 dB limit (in accordance with the Evening and Weekends limit, as per BS 5228-1) due to working hours falling out of</p>

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						Monday to Friday: 07:00 to 19:00 and Saturday: 07:00 to 13:00. Special measures and arrangements will be made for works in proximity to sensitive receptors and controlled with a CEMP.
	THC49	Construction Noise/vibration	THC stated that it is understood that the typical construction activities and work methods would be set out in the EIA Report. The Principal Contractor will undertake a Construction Environmental Management Plan (CEMP) which will define specific methods for environmental survey, monitoring and management throughout construction. However, given the size and nature of the construction of this project, it is also essential that the community liaison arrangements are put in place throughout the duration of the project. The community liaison should keep residents informed of the progress of any sections of the OHL which are in close proximity to noise sensitive properties and which may impact on them and allow for any complaints to be addressed fairly and expeditiously.		Volume 2, Chapter 15: Noise and Vibration	The Applicant confirms that typical construction activities and work methods are set out in this EIA Report. The Principal Contractors will produce a CEMP which will define specific methods for environmental survey, monitoring and management throughout construction. The Applicant will ensure that community liaison arrangements are put in place throughout the duration of the project. The community liaison will keep residents informed of the progress of any sections of the alignment which are in close proximity to noise sensitive properties and which may impact on them and allow for any complaints to be addressed fairly and expeditiously.
	THC50	Construction Noise/vibration	THC stated that the applicant will need to ensure that the EIA contains a construction noise/vibration assessment. The assessment should be carried out by a competent person, in accordance with BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open sites" It should include: 1) A description of construction activities with reference to noise/vibration generating plant, equipment and construction traffic.		Volume 2, Chapter 15: Noise and Vibration	This EIA contains a construction noise/vibration assessment in Volume 2, Chapter 15: Noise and Vibration . The assessment has been carried out by a competent person, in accordance with BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open sites" and it includes the details listed by THC in their scoping response.

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			<p>2) A detailed plan showing the location of noise/vibration sources, noise sensitive premises and any survey measurement locations.</p> <p>3) A description of any mitigation methods that will be employed and the predicted effect of said methods on noise levels. Mitigation measures must include detail of the construction working hours. It should be noted that the Highland Council's recommended construction working hours are 8am to 7pm Monday to Friday and 8am to 1pm on Saturdays with no work on Sundays. Any working undertake out with those hours would require written approval from the Planning Authority.</p> <p>4) A prediction of noise levels resultant at the curtilage of noise sensitive receptors.</p> <p>5) An assessment of the predicted noise levels in comparison with relevant standards</p>			
	THC51	Construction Noise/vibration	The noise assessment will also require including an assessment of the impact of noise from construction traffic. If piling is required in locations close to residential properties, this can also result in significant disturbance. In addition to nuisance, one of the most common concerns about piling is the perceived risk of structural damage. This is out-with the remit of this Service but is something the applicant should be mindful of. It is also expected that the contractor will employ the best practicable means to reduce the impact of noise/vibration from construction activities at all times and details of these will be included in the CEMP.		Volume 2, Chapter 15: Noise and Vibration	<p>The noise assessment in Volume 2, Chapter 15: Noise and Vibration includes an assessment of the impact of noise from construction traffic.</p> <p>The piling impacts detailed in the response have been noted.</p> <p>The contractor will employ the best practicable means to reduce the impact of noise/vibration from construction activities at all times and details of these will be included in the CEMP.</p>
	THC52	Operational Noise	In relation to operational noise, THC stated that due to the close proximity of some of the sections of OHL to residential and noise sensitive properties, the applicant will be required to submit a detailed noise assessment undertaken by a competent person. It		Volume 2, Chapter 15: Noise and Vibration	<p>A detailed noise assessment is included in Volume 2, Chapter 15: Noise and Vibration.</p> <p>The noise assessment includes the information detailed in the scoping response from THC.</p>

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			<p>is noted that the scoping reports outlines basis of the noise assessment, and the noise assessment should include, but is not limited, to the following:</p> <ul style="list-style-type: none"> • A description of the proposed development in terms of noise sources and the proposed locations and operating times of the same. • A detailed plan showing the location of noise sources, noise sensitive premises and survey measurement locations. • A description of any noise mitigation methods that will be employed. The effect of mitigation methods on the predicted levels should be reported where appropriate. • A survey of current ambient (LAeq) and background (LA90) noise levels at appropriate locations neighbouring the proposed site. It is noted that the scoping report confirms a survey of the background noise (LA90,T) ambient noise (LAeq,T), and 1/3rd octave band levels will be conducted at nearby NSRs likely to be affected by the noise, in accordance with TGN(E)3228. • A prediction of noise levels resultant at neighbouring noise sensitive premises, for the operational phase of the proposed development. The raw data and equations used in the calculations should be made available on request. • An assessment of the predicted noise levels in comparison with relevant standards. It is noted that the scoping reports cover the relevant standards and guidance which would apply to this development. • The outcome of the noise assessment must clearly demonstrate noise arising from proposed development (including any accumulative effect from existing noise 			

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			sources) will not have any adverse impact on existing noise sensitive properties and will meet agreed the target criteria.			
	THC53	Construction Dust	THC stated that where sections of the OHL are in close proximity to residential or sensitive properties, a scheme for the suppression of construction dust will require to be include in the EIA or as part of the CEMP.		CEMP	Where sections of the alignment are in close proximity to residential or sensitive properties, a scheme for the suppression of construction dust will be included as part of the GEMPs and CEMP.
	THC54	Cultural Heritage	<p>THC stated that the EIAR needs to identify all designated sites which may be affected by the development either directly or indirectly. This will require the assessment to identify:</p> <ul style="list-style-type: none"> the architectural heritage (Conservation Areas, Listed Buildings); the archaeological heritage (Scheduled Monuments); the landscape (including designations such as National Parks, National Scenic Areas, Areas of Great Landscape Value, Gardens and Designed Landscapes and general setting of the development; and the inter-relationship between the above factors. 		Volume 2, Chapter 12: Cultural Heritage	<p>Potential for effects on cultural heritage assets has been addressed in Volume 2, Chapter 12: Cultural Heritage.</p> <p>A preliminary review and input to the WHS Assessment Toolkit for the Flow Country WHS, in line with the Natural designation of the site, has been undertaken. As a result, this has not be covered in the cultural heritage assessment, but an assessment instead forms an appendix to the Ecology chapter (Volume 5, Appendix 8.10: The Flow Country WHS Impact Assessment Report).</p>
	THC55	Cultural Heritage	THC would expect any assessment to contain a full appreciation of the setting of these historic environment assets and the likely impact on their settings. THC stated that it would be helpful if, where the assessment finds that significant impacts are likely, appropriate visualisations such as photomontage and wireframe views of the development in relation to the sites and their settings could be provided. Visualisations illustrating views both from the asset towards the proposed development and views towards the asset with the development in the background would be helpful.		Volume 2, Chapter 12: Cultural Heritage	<p>The noted chapter includes an assessment that contains a full appreciation of the setting of historic environment assets and the likely impact on their settings.</p> <p>Where the assessment found that significant impacts are likely, appropriate visualisations such as photomontage and wireframe views of the development in relation to the sites and their settings have been provided.</p>

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	THC56	Cultural Heritage	THC stated that it is anticipated that Historic Environment Scotland (HES) will provide comments on the assessment methodology for heritage assets within their remit including the scope of the assessment and their requirements for any supporting information (including visualisations) and the potential impacts on heritage assets. Detailed advice covering their interests has also previously been provided through pre-application advice.		N/A	This has been noted.
	THC57	Cultural Heritage	The THC's Historic Environment Team has noticed that the scoping report has identified key receptors in relation to listed buildings and conservation areas for each section of the proposed overhead line. These focus on Category (A) Listed Buildings, Inventory Gardens and Designed Landscapes, Inventory Battlefields and Scheduled Monuments. The proposed assessment therefore fails to consider impacts on a number of significant Category B and C listed buildings (as well as other designated heritage assets) along the route. The scope of the setting assessment will need to be widened to key Category B and C listed buildings where the ZTV indicates intervisibility with the proposal (including alternative routes) and/or the OHL is located within 5km of the listed building. THC would be pleased to agree with the applicant those Category B and C listed buildings that warrant further detailed assessment in advance of conducting the study. Equally, setting assessments are required in relation to all conservation areas where the ZTV indicates intervisibility with the proposal (including alternative routes). Due to the proximity of the proposal to the Strathpeffer Conservation Area, specific assessment is required to include photomontages from key vantage points.		Volume 2, Chapter 12: Cultural Heritage	This EIA includes an assessment of Category B and C listed buildings. The list of assets for inclusion has been provided to THC for comment.

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	THC58	Cultural Heritage	The Historic Environment Archaeology officer is satisfied with the information provided in the scoping report and will adequately address an impact assessment for this proposal. The methodology as set out in the Scoping Report Section 9 is acceptable and will allow an assessment of the predicted impacts to be made. The scrutiny of available lidar data either open-access or anything produced as part of this project may identify assets where none have been found previously and this would be recommended. In addition, it is recommended that updated HER data is sought in advance of the start of the EIA research so that the baseline information is as recent as possible. Upstanding remains should be identified by survey and the potential for buried features or deposits to be present should be stated in the report. The scrutiny of available lidar data may identify assets where none have been found previously and this is welcomed. Where impacts are unavoidable, HET expect methods to mitigate this impact to be discussed in detail.		N/A	This has been noted.
	THC59	Cultural Heritage	THC stated that the indirect impacts on designated assets have taken the necessary direction from Historic Environment Scotland and are presented clearly in the Scoping Report. Therefor the THC' Historic Environment Team do not propose any additional archaeological assets (undesigned) that would need to be included in that study.		N/A	This has been noted.
	THC60	Traffic and Transport	THC Transport Planning review the Scoping Report and made the following comments. Transport Planning on behalf of the Local Roads Authority (The Highland Council) request: 1. A single Transport Assessment (TA) to support the application rather than the two proposed by the applicant		Volume 2, Chapter 14: Traffic and Transport	A transport assessment is included in Volume 2, Chapter 14: Traffic and Transport and in Volume 5, Appendix 14.1: Transport Statement . The noted chapter considers any potential effects of increased traffic (realistic worst-case) including the bulk construction materials on both trunk and THC maintained roads and adjacent communities along the proposed

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			<p>(see section 12.6.13). This will simplify and streamline its consideration. Only a single schedule of mitigation will be acceptable to address both the environmental and structural effects of transport on the local road network (it will not be appropriate to have two S96 Road Scotland Act Agreements or two Construction Phase Traffic Management Plans covering the same area of network). The relevant sections of the TA can be cross referenced within the EIA report.</p> <p>2. A detailed scoping report to be agreed in writing by the Transport Planning Team prior to submission of the TA. The TA required is broader than that needed for the EIA alone</p> <p>3. A detailed impact assessment of the transport movements generated to haul the bulk construction materials required for the access tracks within the Transport Assessment. This cannot be dealt with at a later stage as part of 'ancillary development' due to the likely scale of the impact and the requirement to manage the risk involved. There are many sensitive routes and receptors within the area. The most practical method of assessing the transport effects and any mitigation required is through a comprehensive TA for the planning consent.</p> <p>4. That the project is broken down into smaller sections agreed with Highland Council due to the scale of the project and the local road network affected. These sections will then be consistently used for the transport assessment, for mitigation proposals and for operational management of the network during construction (based on the mitigation</p>			<p>construction delivery routes based on information available at the time of completing this EIA. Volume 3, Figure 14.4: Indicative Construction Delivery Routes shows the public road network likely to be used for construction deliveries.</p> <p>Whilst the Study Area has been broken down into smaller sections, it has not been possible to split with reference to the Operational Structure of the Council because some of the sections in the study area are located in more than one of the operational areas.</p>

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			<p>identified). These sections shall be agreed with reference to:</p> <ul style="list-style-type: none"> the Road Operational Structure of the Council the sources of the bulk materials (the possible quarries or borrow pits to be used) the main construction compounds or railheads proposed for laydown of materials and plant during construction (minor compounds may need to be brought forward at a later stage) the routes from the quarries to the main compounds, and from the main compounds to the access tracks for the OHL <p>5. A meeting with the applicant early in 2025 to discuss the resources required within the Council for assessment and management of the impact on the local road network. The scale of the project and the likely effect on the Local Road Network is so extensive that Highland Council consider additional staff resource is required within the Authority</p> <ul style="list-style-type: none"> at the planning stage to assess the submission in a suitably detailed manner within the timescales required by the project and during the enabling, construction and reinstatement phases to manage the mitigation required on the local road network (this will include the Road Authority Permissions). <p>6. More detailed guidance is currently being compiled to assist the applicant in preparing a comprehensive TA scoping document (and subsequent TA) and will be forwarded as soon as possible.</p>			

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	THC61	Traffic and Transport	<p>Required Supporting Evidence for the Summary</p> <p>1. A single Transport Assessment</p> <p>Extract from section 12.6.13 of the Environmental Impact Scoping Report October 2024. A Transport Assessment (TA) will be prepared. The TA and the EIA would utilise the same baseline data; however, the TA will be prepared in accordance with its own relevant guidance and best practice and will be subject to a separate scoping exercise with the relevant authority. It will focus on the ability of the surrounding highway network to accommodate traffic associated with the Proposed Development'</p> <p>2. A single scoping document for the Transport Assessment</p> <p>See item 1 above.</p> <p>3. Requirement to include the access tracks within the Transport Assessment</p> <p>i) Scope of Impact on the local road network</p> <p>Figure 2.1 (Appendix A of the EIA Scoping Report) Showing the extent of the connection route.</p> <p>THC stated that SSE have appointed different contractors to deal with different sections. Murphy are the contractor for Section A (shown on the plan above). Murphy have engaged with the Local Road Authority, and this has been helpful. The contractors for phases B to E have not submitted similar information to date. Further details of the scope are therefore given below for section A only.</p> <p>ii) Significance of Impact on the local road network – fragile local road network</p> <p>THC provided and extract from the Agreed Route Map for Timber Transport. For all routes except those shown green</p>		Volume 2, Chapter 14: Traffic and Transport	This information is provided in the Volume 2, Chapter 14: Traffic and Transport and Volume 5, Appendix 14.1: Transport Statement .

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			<p>consultation is required with the road's authority for standard HGV movements. Link to website: https://timbertf.maps.arcgis.com/apps/webappviewer/index.html?id=4a23d4910e604b71872956441113c83c</p> <p>4. Requirement to break down the Transport Assessment and the Mitigation into consistent sections to be agreed with the Roads Authority</p> <p>Ensuring that the transport assessment and related mitigation is structured in a consistent manner throughout the lifetime of the project will expedite management of the process for the Council and for the applicant. Splitting the project into manageable sections that align with the Road Operations structure of the council will assist particularly during the construction and monitoring of the mitigation and the related Roads Authority consents.</p> <p>5. Discussion of resources required to assess and manage the impact on the local road network of this scheme (concurrent with other significant energy applications).</p> <p>To ensure that the risk to the local road network is managed with appropriate mitigation and monitoring appropriate resource is required within the Local Road Authority. Tables 3.2 and 3.3 of the scoping documents submitted lists 27 significant Substations, Grid Connections, Battery Energy Storage Systems and Windfarms which may have a cumulative impact on the local road network together with the current proposals. This number of developments and the scale of the OHL project shows the extraordinary scale of energy related projects requiring assessment and management at present.</p>			

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	THC62	Socio-Economic, Tourism and Recreation	THC stated that a development of this scale and duration may result in potential significant effects (positive and/or negative). THC consider that Socio-Economic, Tourism and Recreational impacts should have its own chapter in the EIAR to ensure that these matters are appropriately addressed and do not agree that part of this should be presented out with the EIA. THC stated that this assessment should be provided within the EIAR, irrespective if the project is an identified national development in NPF4 or otherwise. The EIAR should estimate who may be affected by the development, in all or in part, which may require individual households to be identified, local communities or a wider socio-economic grouping such as tourists and tourist related businesses, recreational groups, attractions and events. The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development. This should set out the impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy.		Volume 2, Chapter 16: Tourism and Recreation	Direct and indirect effects on tourism and recreation receptors have been assessed in the Tourism and Recreation chapter of this EIA Report. Effects on the tourism economy and on the local economy more widely have been assessed in the Socio-economic Technical Assessment which accompanies the application. This includes consideration of the jobs and economic activity associated with the construction and operation of the Proposed Development.
	THC63	Public Access	THC stated that the site is on land with access rights provided by the Land Reform Scotland Act. The potential impact on and mitigation for public access should be assessed incorporating core paths, public rights of way, long distance routes, other paths, and wider access rights across the site. While the Scoping Report and an eventual EIA may include impacts on elements of outdoor access assessed under other headings, THC's Access Officer considers that all the impacts on outdoor access should be brought together in a comprehensive		Volume 2, Chapter 16: Tourism and Recreation Volume 5, Appendix 16.1: Outdoor Access Management Plan	Volume 2, Chapter 16: Tourism and Recreation of this EIA Report provides an assessment of direct and indirect impacts on access within the study area, drawing on the findings of other relevant assessments including the Landscape and Visual Impact Assessment. The Outdoor Access Management Plan provides information on the approach to minimising negative impacts on public access and maximising positive impacts.

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			<p>assessment of the proposals visual and physical impacts on outdoor access during the preparatory, construction, operational and post-operational phases. THC's Access Officer considers that Scoping Report Chapter 15.5 contains two incorrect statements:</p> <ul style="list-style-type: none"> Para 15.5.1 states that there is no established guidance for conducting a recreation (and tourism assessment) as part of an EIA process. NatureScot's Handbook on EIA has however carried out such guidance in its 5th edition published in 2018. Appendix 6 (Outdoor Access Impact Assessment) can be found via the following weblink and the applicants are encouraged to follow this format: https://web.archive.org/web/20220901050635/https://www.nature.scot/sites/default/files/2018-05/Publication%202018%20-%20Environmental%20Impact%20Assessment%20Handbook%20V5.pdf <p>THC stated that following the aforementioned guidance will ensure that a comprehensive baseline is assessed from which an accurate picture of impact can be gained, and mitigation measures planned. That will inform the access management plan that the Planning Authority will request under HwLDP Policy 77 Public Access, and which is promised in EIAR Scoping Report Para 15.4.3 and should reference HwLDP Policy 78 Long Distance Routes for maintaining these routes and protecting their setting.</p> <ul style="list-style-type: none"> Para 15.5.2 goes on to reference the DMRB as an example of guidance that might be used to inform the assessment. This should instead have referenced the aforementioned guidance which should be applied. 			The guidance set out in the EIA Handbook has been used to inform the Tourism and Recreation assessment in place of the Design Manual for Roads and Bridges (DMRB).

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	THC64	Public Access	THC stated with regard to statements on potential impacts refer to temporarily or permanently diverting core paths and public rights of way, the applicant should be aware that diverting those paths are likely to require the successful making of orders for which the applicant will be required to pay for, whether or not they are successful. THC stated that the processes can be long and the outcomes far from assured. It would be more efficient to consider the impacts of the project on public access, minimise any negative impacts and maximise positive impacts from the outset.		Volume 5, Appendix 16.1: Outdoor Access Management Plan	This has been noted. The Outdoor Access Management Plan outlines the approach to minimising negative impacts on public access and maximising positive impacts.
	THC65	Forestry	The Council's Forestry Officer welcome the inclusion of a Forestry Impact Assessment (FIA) chapter within the EIA Report to quantify the total area of felling required for the operational corridor. The forestry officer also welcome 14.3.3 which states that 'the width of the operational corridor, and thus degree of felling, would be minimised'.		Volume 2, Chapter 13: Forestry	Volume 2, Chapter 13: Forestry features a Forestry Impact Assessment (FIA) chapter to quantify the total felling area required for the operational corridor, including associated components such as additional temporary and permanent roads.
	THC66	Forestry	THC stated that it is important to distinguish between permanent woodland removal and restructuring. Permanent woodland removal will need to be assessed against the acceptability criteria described within the CWR policy and in most cases, it will include a requirement for compensatory planting. One exception to this may be where an approved Forest Plan has already identified an area for forest to bog restoration, as alluded to in section 14.3.4 of the SR.		Volume 2, Chapter 13: Forestry	The Forestry chapter differentiates between permanent woodland removal and restructuring (temporary woodland removal). A dedicated assessment of forestry interests is included in this EIA Report, detailing compensatory planting requirements where applicable.
	THC67	Forestry	THC stated that restructuring, which should be the default position, may include a change in management objectives, such as from productive conifer plantation to native woodland managed for biodiversity. This would create a more stable woodland with a lower ultimate height which would help minimise		Volume 2, Chapter 13: Forestry	A Compensatory Planting Plan will be prepared to clearly identify all areas of temporary woodland removal by woodland type, enabling accurate calculation of the restructuring area. These restructuring activities will adhere to the Scottish Forestry regulations on Felling and

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			the width of the operational corridor and therefore the area of permanent woodland removal. Robust justification needs to be given where there is a departure from this approach.			Restocking as outlined in the Strategic Environmental Assessment 2018. They will also comply with the UK Forestry Standard guidance and align with the provisions stated in the Long-Term Forest Plans (LTFP) or Felling Licence applications.
	THC68	Forestry	Section 14.4.2 of the SR identifies compensatory planting as one of the key forms of mitigation. THC stated that a Compensatory Planting Plan will be required which clearly identifies all areas of permanent woodland removal by woodland type in order to then calculate the area of compensatory planting. Woodland types could be defined as productive/non-productive, native/non-native and ancient/non-ancient (with reference to the Ancient Woodland Inventory). Where woodlands of high biodiversity value are to be removed, an enhanced area and specification will be required for compensatory planting. THC stated that the detail as to how this will be calculated is to be agreed with the Planning Authority.		Volume 2, Chapter 13: Forestry	A Compensatory Planting Plan will be prepared which will clearly identify all areas of permanent woodland removal by woodland type in order to then calculate the area of compensatory planting. Where woodlands of high biodiversity value are to be removed, an enhanced area and specification will be provided for compensatory planting, detail as to how this will be calculated will be agreed with the Planning Authority.
	THC69	Forestry	Section 14.5.2 of the SR suggests that the FIA will focus on areas of commercial forestry. THC stated that while this may be the woodland type most affected by the proposed development (estimated at 67%), NPF4 Policy 6 identifies other woodland types which afford the greatest protection, such as ancient woodland and veteran trees. It is these areas which require greater consideration in terms of avoiding or minimising woodland removal. Any tree groups or individual trees of particular merit must also form part of the FIA. THC stated that it may be more appropriate to adopt the Arboricultural Impact Assessment methodology given in BS5837:2012 (Trees in relation to design, demolition and construction) for this more detailed level of survey.		Volume 2, Chapter 13: Forestry	An evaluation of the woodland elements, encompassing not only commercial forestry but also all woodland types identified under NPF4 Policy 6, has been carried out and quantified. Particular emphasis has been placed on avoiding and minimising woodland removal in areas of greatest ecological value throughout the evaluation process.

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	THC70	Issues to be Scoped Out	<p>The THC's Forestry Officer disagrees with section 14.7.1 of the SR which suggests that the FIA will not consider any felling or restocking requirements outwith the operational corridor. It is considered as essential for the wider implications of permanent woodland removal or restructuring associated with the proposed development, as identified in 14.3.2, to be assessed within the EIA Report. Even if the works outside the operational corridor are to remain the responsibility of the landowners, any impact arising from the proposed development and the associated mitigation needs to be identified, along with a proposed mechanism for securing delivery.</p> <p>The THC's Forestry Officer accepts 14.7.2 which suggests that secondary effects resulting from forestry activities (such as habitats and species), will be considered within their respective chapters within the EIA Report. However, THC highlight that it will be important that these respective chapters make direct reference to the FIA chapter to ensure consistency.</p>		Volume 2, Chapter 13: Forestry	<p>While the removal of woodland and subsequent restocking outside the operational corridor has not been included in the scope, consideration has been given to woodland stands that may experience implications, such as potential windblown risks, as a result of corridor woodland felling.</p> <p>The Applicant has ensured clear communication with landowners to confirm that any impacts arising from the proposed development are their responsibility and must comply with Forestry regulations.</p> <p>Consistency has been maintained between the EIA and FIA chapters to ensure alignment and clarity.</p>
	THC71	Climate	<p>The EIAR needs to address all relevant climatic factors which can greatly influence the impact range of many of the preceding factors on account of seasonal changes affecting, rainfall, sunlight, prevailing wind direction etc. From this base data information on the expected impacts of any development can then be founded recognising likely impacts for each phase of development including construction, operation, and decommissioning. Issues such as dust, air borne pollution and / or vapours, noise, light, can then be highlighted. Consideration must also be given to the potential health and safety risks associated with lightning strikes given the proximity of recreational routes through the site.</p>		Throughout this EIA Report	<p>Climatic factors are considered in limited instances but most of these issues are scoped out of the assessment as impacts are not likely to result in significant effects on environmental receptors.</p>

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	THC72	Significant Effects on the Environment	<p>Leading from the assessment of the environmental elements the EIAR needs to describe the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from:</p> <ul style="list-style-type: none"> the existence of the development; the use of natural resources; and the emission of pollutants, the creation of nuisances and the elimination of waste. <p>The potential significant effects of development must have regard to:</p> <ul style="list-style-type: none"> the extent of the impact (geographical area and size of the affected population); the trans-frontier nature of the impact; the magnitude and complexity of the impact; the probability of the impact; and the duration, frequency and reversibility of the impact. <p>The effects of development upon baseline data should be provided in clear summary points.</p>		Throughout this EIA Report	The significant effects of the Proposed Development on the environment has been developed in line with guidance from THC's scoping response.
	THC73	Significant Effects on the Environment	The Council requests that when measuring the positive and negative effects of the development a four point scale is used advising any effect to be either strong positive, positive, negative or strong negative.		Volume 2, Chapter 5: EIA Process and Methodology	The methodology used for assessing significance of effect is provided in Volume 2, Chapter 5: EIA Process and Methodology and defines effects as major, moderate, minor or negligible.
	THC74	Significant Effects on the Environment	THC stated that the applicant should provide a description of the forecasting methods used to assess the effects on the environment.		Volume 2, Chapter 5: EIA	The methodology used for assessing significance of effect is described in Volume 2, Chapter 5: EIA Process and Methodology.

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					Process and Methodology	
	THC75	Mitigation	THC stated that consideration of the significance of any adverse impacts of a development will of course be balanced against the projected benefits of the proposal. Valid concerns can be overcome or minimised by mitigation by design, approach, or the offer of additional features, both on and off site. A description of the measures envisaged to prevent, reducing and where possible offset any significant adverse effects on the environment must be set out within the EIAR and be followed through within the application for development.		Throughout this EIA Report	A description of the measures to prevent, reduce and where possible offset any significant adverse effects on the environment is described within this EIA Report.
	THC76	Mitigation	THC stated that the EIAR should present a clear summary table of all mitigation measures associated with the development proposal. This table should be entitled draft Schedule of Mitigation. As the development progresses to procurement and then implementation this carries forward to a requirement for a Construction Environmental Management Document (CEMD) and then Plan (CEMP) which in turn will set the framework for individual Construction Method Statements (CMS). This is currently under review by a working party led by SEPA working through Heads of Planning Scotland but for the time being remains relevant.		Volume 2, Chapter 19: Schedule of Mitigation	This EIA Report includes a Schedule of Mitigation (Volume 2, Chapter 19: Schedule of Mitigation) which presents a clear summary table of all mitigation measures proposed.
	THC77	Mitigation	THC stated that the implementation of mitigation can often involve a number of parties other than the developer. In particular local liaison groups involving the local community are often deployed to assist with phasing of construction works – abnormal load deliveries, construction works to the road network, borrow pit blasting. Therefore, THC stated that it should be made clear within the EIAR or supporting information accompanying a planning application exactly which groups are		Throughout this EIA Report	If available by the time of submission, it has been made clear within this EIA Report/supporting information accompanying the planning application which liaison groups are being involved in the implementation of mitigation, the remit of the group and the management and resourcing of the required effort will also be detailed.

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			being involved in such liaison, the remit of the group and the management and resourcing of the required effort.			
	Transport Scotland (TS) TS01	Traffic and Transport	Chapter 12 of the scoping report states that base traffic flows will be sought from THC, Transport Scotland, and the Department for Transport (DfT). It also states that the scope of the assessment will be agreed with Transport Scotland and THC, once the estimated trip generation during construction has been finalised. Transport Scotland is satisfied with this approach, however, given the potential for crossing both the A9 and A835 trunk roads, it should be noted that Transport Scotland will require to be satisfied that the proposed construction methodology will be carried out in a safe and efficient manner which will have minimal impact on trunk road users. It should be also noted that a Construction Traffic Management Plan will be required, and this should be discussed and agreed with the relevant Area Managers.	Annex A pages 141 - 142	Volume 2, Chapter 14: Traffic and Transport	<p>The Applicant will seek to engage separately with Transport Scotland on the proposed construction methodology for any potential crossing of both the A9 and A835 trunk roads to ensure it will be carried out in a safe and efficient manner which will have minimal impact on trunk road users. This is beyond the scope of this EIA and will be undertaken post submission.</p> <p>An Outline Construction Traffic Management Plan has been developed as part of this EIA Report (Volume 5, Appendix 3.8) details of which will be finalised post consent following discussion and agreement with the relevant Area Managers.</p>
	TS02	Traffic and Transport	The Scoping Report states that existing access junctions “ <i>would be utilised where possible or would be upgraded wherever necessary to accommodate construction traffic</i> ”. Transport Scotland state that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager. The Area Manager for the A9(T) and the A835(T) is Graeme Paget who can be contacted at graeme.paget@transport.gov.scot .	Annex A pages 141 - 142	N/A	The Applicant will engage with Transport Scotland to address this particular matter post submission of this EIA Report.
	TS03	Traffic and Transport	Any impacts associated with the operational phase of the development are to be scoped out of the EIA. Transport Scotland consider this to be acceptable in this instance.	Annex A pages 141 - 142	N/A	This has been noted.

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	TS04	Abnormal Loads Assessment	Transport Scotland note that it is possible that Abnormal Indivisible Load (AIL) deliveries will be required. If such loads are required, further routing studies and swept path analysis will be undertaken. This is considered appropriate, and Transport Scotland would add that they will require to be satisfied that the size of loads proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.	Annex A pages 141 - 142	N/A	No abnormal loads are anticipated although it may be that some plant such as cranes may be abnormal due to their width. This will be confirmed in the Construction Traffic Management Plan (CTMP) to be finalised post consent.
	Woodland Trust (WT) WT01	Ancient Woodland Inventory	Woodland Trust consider that the development has the potential to give rise to significant impacts on several areas of woodland designated on NatureScot's Ancient Woodland Inventory as detailed in Annex 1 at the foot of the scoping response letter. Woodland Trust have specified the AWI classification of the woodlands, in addition to whether they are recorded on the Native Woodland Survey of Scotland. They have also indicated whether the woodlands are within or adjacent to the proposed boundary.	Annex A pages 93- 98	Volume 2, Chapter 13: Forestry	This information has been taken into account during the development of the specified forestry chapter. Woodlands listed in the Ancient Woodland Inventory have been evaluated and quantified as part of Volume 2, Chapter 13: Forestry .
	WT02	Woodlands – Study Area	Woodland Trust state that it is not clear whether it is the applicant's intention to consider woodlands adjacent to the proposed boundary in addition to those situated within the boundary. In view of the potential for root encroachment and indirect impacts where woodlands are in close proximity to development, Woodland Trust consider that the assessment should include woodlands that are within 30 metres of the proposed boundary.	Annex A pages 93- 98	Volume 2, Chapter 8: Ecology and Nature Conservation Volume 2, Chapter 13: Forestry	The Applicant has identified a Proposed Alignment following a thorough route selection process as outlined in Volume 2, Chapter 4: The Routeing Process and Alternatives . On top of the alignment is a Limit of Deviation, an area for which, if necessary and with good reason the alignment may be micro-sited without needing to re-apply for consent. An LoD of 100 m either side of the Proposed Alignment is required and as such a 100 m study area has been considered. Further to this The Applicant has an operational responsibility to maintain a safe operational line, with this comes an "operational corridor" an area kept clear of trees to prevent damage to the line.

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	WT03	LEPO woodland	Woodland Trust consider that, where LEPO woodland sites are recorded on the Native Woodland Survey of Scotland (NWSS), it is likely that such sites will have a majority native canopy cover and should therefore be protected in line with national planning policy. The woodlands listed in Annex 1 of the scoping response letter include LEPO designated woodland that is also on the NWSS.	Annex A pages 93- 98	Volume 2, Chapter 8: Ecology and Nature Conservation Volume 2, Chapter 13: Forestry	<p>SSEN Transmission's BNG toolkit recognises ancient and veteran trees in addition to the categories of woodland listed on the AWI listed.</p> <p>This information has been taken into account during the development of the specified FIA chapter. Woodlands listed in the National Woodland Survey of Scotland such as LEPO have been evaluated and quantified as part of Volume 2, Chapter 13: Forestry Chapter.</p>
	WT04	Ancient and important woodland – Assessment methodology	<p>Woodland Trust consider that in order to fully assess potential impacts of the development on ancient and important woodland the following approach should be adopted:</p> <ul style="list-style-type: none"> Where it is considered that a woodland designated on the AWI will not be treated as ancient and thus irreplaceable habitat, the EIA should include full details of the ecological methodology and assessment. Details should be included of the assessments of the ecological condition and importance of woodlands classified as LEPO or Roy on the AWI. Any non-ancient woodlands potentially affected by the development should be reviewed to ensure any areas of unmapped ancient woodland are accounted for as the design progresses. 	Annex A pages 93- 98	Volume 2, Chapter 8: Ecology and Nature Conservation Volume 2, Chapter 13: Forestry	<p>Where it is considered that a woodland designated on the AWI will not be treated as ancient and thus irreplaceable habitat, this EIA includes full details of the ecological methodology and assessment.</p> <p>Details are included of the assessments of the ecological condition and importance of woodlands classified as LEPO or those that appear on the Roy maps on the AWI.</p> <p>Any non-ancient woodlands potentially affected by the development have been reviewed so that areas of unmapped ancient woodland are accounted for.</p>
	WT05	Ancient Tree Inventory	Woodland Trust noted the presence of four trees within the site boundary which are registered on the Ancient Tree Inventory as detailed in Annex 1 of the scoping response letter. Woodland Trust consider that the applicant should ensure that the development does not adversely impact ancient, veteran or over-mature trees.	Annex A pages 93- 98	Volume 2, Chapter 13: Forestry	The Applicant acknowledges the presence of the four trees registered on the Ancient Tree Inventory within the site boundary, as noted by the Woodland Trust. These four trees are now outwith the LOD and therefore will not be impacted by the Proposed Development.

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	WT06	Arboricultural Impact Assessment	Woodland Trust recommend that an Arboricultural Impact Assessment is undertaken to inform the EIA to ensure that any important trees (including any ancient or veteran trees) are identified and accounted for ahead of the full planning application. As part of the assessment the applicant should review the Ancient Tree Inventory (ATI) in addition to identifying other ancient or veteran trees that may not be recorded on the ATI. The ATI is a live database so new tree records are added and updated regularly. The ATI is also not a comprehensive register of all veteran trees and therefore must be complemented with on the ground surveying.	Annex A pages 93- 98	Volume 2, Chapter 13: Forestry	Veteran and ancient trees have been identified as part of the forestry assessment.
	WT07	Holding Objection	The Woodland Trust will be holding an objection to the development in view of the potential for serious impact, loss or deterioration of ancient woodland and veteran trees.	Annex A pages 93- 98	N/A	This is noted.