

TRANSMISSION

Visual Impact of Scottish Transmission Assets (VISTA)

www.ssen-transmission.co.uk

Our Approach for RIIO-T2

December 2019

Scottish Hydro Electric Transmission plc

Welcome

Scottish Hydro Electric Transmission plc (SHE Transmission) owns and maintains the electricity transmission network in the north of Scotland. The network comprises almost 5,300 km of high voltage electricity infrastructure and serves around 70% of the land mass of Scotland.

As we undertake our work, we recognise that due to the nature and scale of our assets, they can have landscape and visual impacts on people and the environment. This not only relates to developing and constructing new transmission assets, but also the presence and operation of our existing infrastructure. The scale of these impacts varies and is dependent on a wide range of factors including the type of infrastructure, presence of other infrastructure, landscape scale, existing land use, local receptors and their sensitivity to change.

For any new development, robust statutory processes exist to ensure impacts are appropriately assessed¹ and considered prior to approval being granted by the relevant consenting body². However, many of our assets were built when different policy drivers existed, and less onerous environmental assessment practices were required by legislation.

In 2016 we published our Visual Impact of Scottish Transmission Assets (VISTA) policy, which was designed to help us realise opportunities to conserve and enhance the natural beauty, wildlife and cultural heritage of National Parks and National Scenic Areas (NSAs).

This document updates our approach to VISTA for RIIO-T2 and has been informed by our experience of delivering projects under the RIIO T1 policy initiative, consultation with stakeholders on what they would like to see in the future, and guidance from Ofgem in terms of their proposed scheme framework³.



Richard Baldwin

^{1.} Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017.
2. Electricity Act 1989 applications are determined by the Scotlish Ministers. Town and Country Planning (Scotland) Act 1997 applications are determined by the Local Planning Authority.
3. Ofgem (2019): RIIO-2 Sector Methodology Decision - Electricity Transmission, page 72-81.
4. SHE Transmission (2016): Visual Impact of Scotlish Transmission Assets (WSTA), https://www.ssen-transmission.co.uk/media/1576/vista-booklet_v2-2.pdf.

SHE Transmission(2016): VISTA: An assessment of the visual impact of Scottish transmission assets - Policy Annex, https://www.ssen-transmission.co.uk/media/1577/vista-policy-annex_v21.pdf.

How VISTA was established

In 2012, the electricity and gas markets regulator (Ofgem) outlined a mechanism to establish a £500m fund in the RIIO-T1 price control for UK electricity transmission owners to mitigate the impact of existing electricity infrastructure on the visual amenity of nationally designated landscapes. Following this, we established the Visual Impact of Scottish Transmission Assets (VISTA) policy initiative⁴. The policy set out a framework for how we identify the most effective mitigation proposals for projects within National Parks and NSAs for which funding is sought from Ofgem.

The benefits of the scheme are achieved by delivering projects that offer significant reductions in visual impact, while avoiding unwanted economic and environmental impacts.

By promoting projects through this initiative we ensure that the proposals taken forward not only represent our vision as to where the natural beauty of the landscape can be enhanced, but also gives our wider stakeholders (including those that live, visit and work in and around the designated landscapes) a voice in contributing to



Where the fund can be used

Ofgem funding is available to mitigate the impacts of transmission infrastructure (132kV, 275kV and 400kV overhead transmission lines and substations) on National Parks and NSAs. In some instances, transmission infrastructure located in the immediate vicinity of a designated area may affect the special qualities identified in the designation and may be considered as eligible for preliminary assessment.

While the majority of our existing infrastructure is located outside designated areas, sections of our network cross high amenity landscapes. Through VISTA, we aim to reduce adverse landscape and visual impacts associated with some of this infrastructure, and where possible enhance Scotland's natural and cultural heritage as a result.

The length of overhead lines identified within National Parks and NSAs amounts to:

- 417km of 132kV overhead transmission lines;
- 48km of 275kV overhead transmission lines; and
- 39km of 400kV overhead transmission lines.

The number of substations identified within or in close proximity to National Parks and NSAs amounts to 16.

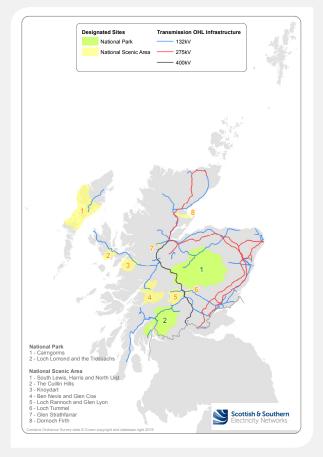


Figure 1 Transmission Assets in National Parks and NSAs.

Note: Assets present at time of printing. Does not account for proposed removal under RIIO-T1 approved schemes.

What the fund can be used for

There is currently strict criteria that proposed mitigation projects must satisfy in order to qualify for consideration as part of Ofgem's proposed incentive. It is important we take full account of these through consultation, assessment and project selection, allowing for identification of candidate projects that deliver the best enhancement of visual amenity. Regard must also be had to our licence obligations under the Electricity Act, the most relevant of these being our duty to maintain our network in an economical and efficient way; having regard to the preservation of amenity; and having regard to the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Parks and NSAs.



The fund can be used for measures which remove or reduce the impacts of existing infrastructure, or which may divert people's attention from impacts. Such landscape enhancement measures could include:

Screening visible elements of infrastructure such as substations or overhead lines;

Re-routing of existing overhead lines;

Replacement of steel lattice towers with wood poles;

Undergrounding existing overhead lines;

Innovative mitigation techniques to reduce visibility of towers:

General landscape enhancements which mitigate the impact of transmission infrastructure, and which may also support management plans or other ongoing initiatives;

Recreational or social initiatives associated with the use of recognised designated areas, and which can be linked to improvement in visual amenity; and

Other mitigation measures identified during consultations with stakeholders, including reducing impact of existing transmission infrastructure in areas of high amenity in close proximity to designated areas.



The fund cannot be used for:

heritage and natural heritage designations;

Reducing visual impact of distribution (i.e. low-voltage)

that are viewed as business as usual; VISTA must show

Following stakeholder involvement at each stage of our process, we selected projects which demonstrate the most potential benefit to take forward for the application of funding from Ofgem. Priority is given to projects with potential for landscape and visual improvements, which have positive social and environmental impacts, and are economically efficient.

Working with Stakeholders

It is recognised that effective stakeholder engagement is essential for successful identification and delivery of the projects identified under the initiative. To ensure that our decisions are reflective of stakeholders' views, we involve as many relevant parties as possible. This approach has been very successful to date and we will seek to build on this going forward.

We will continue to engage interested parties through the VISTA website, social media, stakeholder forums, and written consultation. From our experience, one of the most effective forms of engagement has been the establishment of regional stakeholder forums. These have been set up to ensure we receive input from relevant stakeholders with knowledge of the specific designated landscapes. We will continue to utilise these established communication routes going forward.

Both ourselves and Scottish Power Energy Networks (SPEN), who are the owner of the transmission network within central and southern Scotland, have assets in the Loch Lomond and Trossachs National Park (LLTNP) and we recognise the importance of a 'joined-up' approach in this area. We will continue to work with SPEN to engage collaboratively where there are areas of mutual benefit.

More widely we will also work with the other Transmission Operators to share best practice and learning from engagement with stakeholders and delivery of projects.

The Stakeholder Forums aim to:

Help identify specific areas within or close to National Parks and NSAs which would benefit from infrastructure mitigation

Shortlist projects that we should take to development phase

Help inform an understanding of other environmental issues so that we can better assess any technical requirements for projects put forward for a request for funding

Help review project benefits and evaluate use of the fund, as development of projects progresses

Contribute to development of mitigation options that could benefit selected projects, including any potential for collaborative working.



Loch Lomond and Trossachs National Park Stakeholder Form.

Our approach to delivering VISTA

In order to deliver the maximum benefit, it is necessary to identify the transmission infrastructure with the greatest impacts and opportunities for mitigation. A number of stages are required to reach this goal, from initial identification of priorities through to implementation of projects. Figure 2 sets out our four key stages to ensure proposals meet the scheme requirements, are prioritised effectively and consistently, provide evidenced value (from a landscape and economic perspective) and meet stakeholder expectations. Further detail on each of these stages is also included in Appendix 2.

Development stages

Identifying Priorities

- Identification of transmission infrastructure;
- Screening of transmission infrastructure;
- Initial Landscape & Visual Assessment;
- Identify most important impacts.

Activities to date

6 designated landscapes were prioritised for further consideration.



Defining the Projects

- Review priority areas;
- Identify mitigation options;
- Appraisal of options & potential benefits;
- Selection of infrastructure & mitigation proposals to be progressed.

12 sections of line were identified within prioritised landscapes through initial stakeholder engagement with 10 options prioritised for further development.



Developing the Projects

- Review priority proposals in more detail;
- Technical, Environmental & Economic Feasibility Studies;
- Detailed development of projects in collaboration with Stakeholders.

Internal feasibility review and further stakeholder engagement identified a shortlist of technical and non-technical schemes to progress to application stage.



Consent & Implementation of Projects

- Consultation with consultees & authorities;
- Environmental Assessment (EA):
- Consent applications;
- Submission of Projects to Ofgem.
- Implementation construction & maintenance.

2 technical undergrounding schemes approved and in construction, 2 technical undergrounding schemes pending funding requests, 1 landscaping scheme approved and pending implementation, 1 landscaping scheme in development.

Figure 2 Stages for project development.

This systematic approach has been followed successfully throughout the RIIO-T1 price control. To date, we have developed six projects to improve the visual impact of our existing assets. Of these, two projects in the Cairngorms National Park (Nethy Bridge and Boat of Garten) have secured funding to underground 12km of overhead line and are in construction. We have secured funding approval for one landscaping project at Loch Tummel and funding requests for two further undergrounding schemes totaling 7.5km in the Loch Lomond and Trossachs National park will be submitted shortly.

Project progress to date



Nethy Bridge - In construction

Removal of 132kV overhead line infrastructure by installing underground cables between the substation east of Boat of Garten to the edge of the forestry near Castle Roy (8.3km).

Cairngorms National Park



Boat of Garten - In construction

Removal of 132kV overhead line infrastructure by installing underground cables between Docharn and the substation east of Boat of Garten (4km).

Cairngorms National Park



Loch Tummel - Approved

Painting of the 132kV towers visible form the Queens View and implementation of a native woodland planting scheme to blend the towers into the landscape.

Loch Tummel NSA



Sloy - Application pending

Removal of 132kV overhead line infrastructure by installing underground cables on various circuits in proximity to Sloy switching stations (2.8km).

Loch Lomond and Trossachs National Park



Glen Falloch - Application pending

Removal of 132kV overhead line infrastructure by installing underground between Inverarnan substation and Crianlarich (4.5km).

Loch Lomond and Trossachs National Park

Opportunities for the future

We have already started the process of engaging our stakeholders on two additional schemes that were shortlisted as part of our RIIO-T1 activities and that we believe have already demonstrated meeting the objectives of VISTA. These are technical projects to underground 132kV overhead line infrastructure at Killin and Glen Strathfarrar. Together, these schemes could facilitate the removal of 47 steel lattice towers in some of Scotland's most sensitive landscapes. Other potential schemes have also been identified for further stakeholder consultation, but these are still at an early stage of development and are also subject to wider network considerations⁵.



Killin - In development

Removal of 132kV overhead line infrastructure by installing underground cables behind the village of Killin (9km).

Loch Lomond and Trossachs National Park



Glen Strathfarrar - In development

Removal of 132kV overhead line infrastructure by installing underground cables from Deanie Power along the side of Loch Beannacharan (3.5km).

Glen Strathfarrar NSA

Note: Applications for Killin and Glen Strathfarrar projects are to be applied for in RIIO-T1 and delivered in RIIO-T2.

Further development activities

As we move into RIIO-T2 we will follow the same, proven, staged approach as undertaken previously, with the intention to build on the extensive engagement, assessment and success that has been delivered to date. We will do this by initiating a formal validation review of all our activities at each stage of our development process (see Figure 2). This review will be undertaken jointly with input from our stakeholder forums and statutory consultees to ensure that all interested parties have a genuine opportunity to contribute to the development of future schemes.

We also welcome Ofgem's proposed modifications to the regulatory approval process for smaller scale, non-technical projects (such as landscaping, tree planting and other enhancement activities) whereby we will be allocated 2.5% of the overall fund⁶.

To help facilitate the efficient management of non-technical schemes we will develop a parallel development pathway, consistent with the principles of the existing staged approach. This will seek to fast track non-technical projects that clearly demonstrate how they meet the scheme objectives and criteria. Approval of these mitigation projects will follow our existing internal governance process in line with the value of the proposed mitigation scheme. Each year we will identify expenditure on activities undertaken as part of our regulatory reporting.

As detailed in Appendix 1, many of our stakeholders were supportive of broadening the scope of the fund to include areas out with National Parks and NSAs, however Ofgem was not in agreement with this approach. In order to meet the terms of the scheme set by Ofgem, but also take cognisance of our stakeholders views, we do not propose to promote schemes out with National Parks and NSAs in RIIO-T2. We will however engage with stakeholders to further test the appetite for broadening the scheme, and where there is stakeholder support we will develop a 'Benefits Assessment Methodology' setting out a range of qualitative and quantitative measures that can be used to assess the landscape and visual value of proposed projects against the backdrop of efficient expenditure.

^{5.} Fort William (Undergrounding of a single circuit 132kV OHL, and Skye (Undergrounding of a single circuit 132kV trident line).
6 Value of fund still to be determined by Ofgem.

Summary

VISTA represents an opportunity to reassess the historic electricity infrastructure within, and in some instances in close proximity to National Parks and NSAs. This will help to conserve and enhance the natural beauty, wildlife and cultural heritage of these important Scottish landscapes.

By promoting VISTA we hope to ensure that the proposals taken forward represent our stakeholders vision as to where the natural beauty of the landscape can be enhanced. This will ensure that those who live, visit and work in and around the designated landscapes have a voice in contributing to the assessment and project prioritisation. Our delivery on mitigation projects to date, coupled with the positive stakeholder feedback, is testament to the success of the scheme and we will continue to ensure that the proposals developed are technically feasible and achieve best value for money by targeting the areas with greatest potential for effective mitigation.

Over the course of RIIO-T2 we will continue early and proactive engagement with our stakeholders, bringing forward technical and non-technical schemes for future delivery. We will also explore further options for extending the scheme out with National Parks and NSAs where stakeholder and Ofgem support has been secured



Get in touch

We are always keen to speak to stakeholders about VISTA and should you wish to contact us about current mitigation projects or our approach to prioritising and developing future projects, we would like to hear from you.

Ways to contact us:

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sustainability-and-environment/vista





Stakeholder views

Since November 2018 we have sought stakeholders' views on how VISTA should be delivered in the future. To do this we ran three workshopsⁱ specifically seeking feedback on the success of the scheme to date, whether the current scheme should be extended into RIIO-T2, and if they would like to see the scope of the scheme changed.

Overall, stakeholders were very supportive of the work we had done through VISTA to date and supported extending the scheme into RIIO-T2. There was also support from many stakeholders that we should seek to broaden the scope of the current VISTA policy to extend beyond National Parks and National Scenic Areas. However, this was not a unanimous view and some suggested it would be necessary to define clearly how such areas would be assessed to ensure benefits can be clearly appraised.

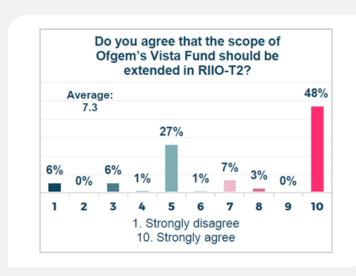


Figure 3 Stakeholder feedback received during RIIO-T2 Stakeholder Workshop (Nov 18).

Ofgem position

Ofgem confirmed in May 2019 that they intend to retain the scheme to mitigate visual impact of pre-existing transmission infrastructure. In addition, they have identified proposed modifications to the regulatory approval process for smaller scale, non-technical projects (such as landscaping, tree planting and other enhancement activities) in that we will be allocated 2.5% of the overall fundiii.

In relation to the scope of the scheme, they confirmed they are not proposing to broaden this to incorporate areas out with National Parks and National Scenic Areas as they consider that consumers will benefit most from the delivery of mitigation projects in sites that have been designated specifically for their natural beauty special qualities.



November 2018 - RIIO T2 Stakeholder Workshop in Glasgow. March 2019 – Environmental Round Table in Perth. August 2019 – RIIO T2 Regional Roadshow in Glasgow. Ofgem (2019): RIIO-2 Sector Methodology Decision.
Value of fund still to be determined by Ofgem following updated willingness to pay study.

Appendix 2 Applied methodology for developing mitigation projects

Background

- 1.1 Scottish Hydro Electric Transmission Plc ("SHE Transmission") is promoting VISTA (Visual Impact of Scottish Transmission Assets), an initiative instigated to assess the impact of existing electricity infrastructure in our ownership on National Parks and National Scenic Areas (NSAs) in Scotland, and where possible, to identify and develop appropriate mitigation. To play a part in conserving Scotland's designated landscapes, we aim to access a proportion of the fund that is administered by the electricity industry regulator Ofgem.
- 1.2 This annex to the policy document provides further detail on the ways in which the policy will be applied and decisions will be made under VISTA. It is recognised that as the VISTA initiative has been running for a number of years there has been significant prioritisation and assessment work undertaken already. We have however maintained this structured approach for future assessments and project proposals as it will allow us to revisit decisions made previously to ensure those decisions are still appropriate and meet the future objectives of the scheme.
- In order to deliver the maximum benefit, it is necessary to identify the transmission infrastructure with the greatest impacts on nationally protected landscapes, but also with greatest potential for mitigation. A number of stages are required to reach this goal, from initial identification of priorities through to implementation of projects. We are also aware that Ofgem are proposing to allocate 2.5% of the overall fund for Transmission operators to implement non-technical landscaping schemes. We propose to run a parallel process for the delivery of Non-technical projects, but the principles set out in this annex will be maintained.

The diagram below sets out the four key stages of the project.



Identifying Priorities

- Identification of transmission infrastructure;
- Screening of transmission infrastructure;
- Initial Landscape & Visual Assessment;
- Identify most important impacts.



Defining the Projects

- Review priority areas;
- Identify mitigation options;
- Appraisal of options & potential benefits;
- Selection of infrastructure & mitigation proposals to be progressed.



Developing the Projects

- Review priority proposals in more detail;
- Technical, Environmental & Economic Feasibility Studies;
- Detailed development of projects in collaboration with Stakeholders.



Consent & Implementation of Projects

- Consultation with consultees & authorities;
- Environmental Assessment (EA);
- Consent applications;
- Submission of Projects to Ofgem.
- Implementation construction & maintenance.

Stage 1 Identify priorities



Identification of infrastructure

- 1.4 We own and operate the electricity transmission network in the north of Scotland. Transmission is defined in Scotland as overhead power lines and substations carrying voltages of 132kV or over. Our network comprises almost 5,300 km of electricity lines and cables, and serves around 70% of the land mass of Scotland.
- 1.5 Ofgem funding is available to mitigate the impacts of transmission infrastructure on nationally protected landscapes. In Scotland, nationally protected landscapes comprise two National Parks and 46 National Scenic Areas (NSA). Transmission infrastructure which is within, or in some cases just outside, nationally designated landscapes, may affect the special qualities of the designation and may be considered as eligible for mitigation as part of this project.
- 1.6 Both National Parks and the majority of the NSAs in Scotland fall within our licence area. The majority of our infrastructure is located outside these designated areas, but there are sections of the network which are within or immediately adjacent to National Parks and NSAs.

Screening of infrastructure

- 1.7 Any project that has been consented through Section 37 of the Electricity Act 1989, since the implementation of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000, will not form part of the VISTA initiative. These projects have undergone rigorous landscape and visual impact assessment, with mitigation measures implemented where necessary. It is not considered that further mitigation of these projects would present the best use of the Ofgem funding.
- In addition, transmission assets within designated areas that are subject to planned major upgrade works, which would potentially lead to the removal or replacement of assets are also excluded from the initiative. The uncertainty surrounding the future of these assets means that effective mitigation cannot be adequately planned and implemented; however, if scheduled or planned work does not go ahead, the eligibility of these assets areas may be reconsidered. Assets which are subject to ongoing or planned refurbishment works, such as replacement of conductors, will be included within the scope of VISTA where these works are unlikely to alter the impact of the assets on designated landscapes.
- 1.9 Assets ruled out through the screening process include:
 - Asset: Cairngorms National Park Beauly-Denny line (Section 37 consent).

Initial landscape and visual assessment

- 1.10 Following definition of the project scope, the landscape and visual impacts of the selected transmission assets will be assessed. This process is designed to identify where impacts are greatest, and therefore where mitigation projects are likely to be most beneficial. Mitigation projects under the VISTA initiative will be targeted where they will give rise to maximum enhancement of the landscape and views within a designated area. While there are financial and technical dimensions to this targeting, the purpose of the landscape and visual assessment is to understand where the most substantial impacts occur as a result of SHE Transmission infrastructure.
- 1.11 The key steps to be undertaken for each designated area are:
 - Understanding the special qualities of the designated area:
 - Identification of infrastructure and definition of sections related to landscape character;
 - Consideration of likely landscape and visual impacts, including landscape fit and sensitive visual receptors;
 - Identification of potential mitigation and likely level of benefit.
- 1.12 Each overhead line is divided into discrete sections to facilitate the assessment, which employs desk study and field work to understand the potential for landscape and visual impacts, and to identify opportunities for mitigation.
- 1.13 The approach taken has been described as a 'reverse landscape and visual impact assessment (rLVIA)', since unlike a standard LVIA it considers the impact of development which is already present in the landscape. The approach will be guided by the Guidelines for Landscape and Visual Impact Assessment (3rd Edition, 2013), and by the Holford Rules that guide the routeing of overhead power lines.

Identify most important impacts

1.14 The results of the rLVIA are used to broadly rank the overhead lines and substations in terms of the relative level of impacts observed. Higher priority is assigned to those assets which are seen to be having the most substantial impacts on visual amenity and on the landscapes of the designated areas. A detailed scoring system will not be used, but overhead line sections will be assigned lower, medium or higher priority depending upon the level of impact observed.

Consultation

- 1.15 At this stage, initial consultation will be undertaken to gather feedback from stakeholders on:
 - Scope of the initiative;
 - · Initial findings of the impact assessment; and
 - Key areas and/or assets which are seen as having substantial impacts on the designated landscapes.

Stage 2 Define the projects



Identify mitigation options

- 1.16 Although the initial focus is on the identification of priority areas, it will also be necessary to understand the potential for mitigation. There are many locations where substantial impacts are observed but with little option for enhancement, due to the nature of the terrain, landscape or access, for example.
- 1.17 The desk study and field work provides opportunity to consider mitigation across all of the transmission assets to be looked at. More importantly, consultation with local stakeholders provides a key means for identifying potential mitigation measures. Meetings with local interest groups, and local representatives of national bodies, will be held to gather views on:
 - Where the infrastructure should be looked at, and why?
 - What mitigation may be appropriate, successful and represent 'best value'?
 - Who will benefit from proposed mitigation?
 - Are there other projects in the area that could complement the VISTA initiative?

The consultation process is outlined from 1.37 onwards and includes a list of stakeholder that SHE Transmission intends to engage with as part of the consultation process.

1.18 Stakeholders will be able to suggest their preference to where mitigation should be targeted in areas identified as having a significant visual impact and will be encouraged to suggest what they view as potentially appropriate mitigation for those areas. We will develop the initiative through small-group sessions with locally knowledgeable stakeholders, aiming to identify diverse options for mitigation in each designated landscape.

Appraisal of options and potential benefits

- 1.19 The likelihood of successful mitigation needs to be balanced against the benefit that would be gained. For example, it may be feasible to underground a given section of overhead line, but if the current impacts of this line are not especially problematic, and the change would be seen by few receptors, then the benefits of this mitigation would be limited.
- 1.20 Full cost-benefit analysis will not be undertaken at this stage, but a high level review will consider the assessed landscape and visual impacts of the assets and the relative likely cost of the proposed mitigation. This review will be undertaken by our teams specialising in; environment, engineering, project development, outage planning, asset management, and land management. It will also be necessary to consider, at a basic level, the potential for adverse impacts on other environmental receptors including habitats and cultural heritage. Those projects that are unlikely to deliver a net benefit will not be taken forward.

Selection of infrastructure and mitigation proposals

- 1.21 Outline information will be developed on a selected 'long list' of mitigation projects. To be included on the long list, a project will need to:
 - Deliver a benefit to the visual amenity and/or landscape of the National Park or NSA that the asset currently affects;
 - Result in no likely additional major long-term adverse effects on other receptors; and
 - Be technically feasible, based on an initial view from our engineering team.
- 1.22 The projects will be grouped according to their location, with alternative approaches presented to mitigating transmission assets which have higher impacts on designated landscapes. For each location where mitigation is proposed, the following information will be gathered:
 - The project location and extent;
 - The assessed impacts of the existing infrastructure;
 - The type(s) of mitigation proposed, i.e. undergrounding, re-routeing, screen planting, etc;

- The indicative likely cost, presented as a relative scale; and
- The benefits and drawbacks of each potential solution.

Consultation

- 1.23 Consultation meetings will be held at this stage to discuss the 'long list' of identified projects, and to gather feedback on those projects which are seen to have most benefit. Stakeholders will be presented with the above information in an accessible format, and will be asked to attach greater or lesser priority to each mitigation option. This will allow stakeholders to select preferred projects through providing supporting rationale on the merit of each proposal presented to them.
- 1.24 In order to facilitate the process, stakeholders will be asked to comment on the value attached to the locations identified through the rLVIA work, the benefit of mitigation in each location, and the potential positive and negative implication of these.
- 1.25 The outcome of these consultations will be a 'short list' of projects which are beneficial, feasible, and which have a degree of stakeholder support.

Stage 3 Develop the projects



Review priority proposals in more detail

1.26 The projects which come forward from the end of Stage 2 as being the most likely to result in potential benefit will be subject to further scrutiny. Additional site work may be required at this stage to inform the further development of the mitigation proposal.

Technical, environmental and economic feasibility studies

- 1.27 We will undertake a more detailed technical feasibility study of each of the short-listed projects, to ensure that they are deliverable and would not result in adverse effects on network resilience.
- 1.28 Environmental studies will include categorisation of the benefits of the proposal for visual amenity or landscape, but will be balanced against a more detailed consideration of potential impacts, including temporary construction

- impacts of engineering solutions. The potential for adverse impacts on a range of receptors will be examined, including effects on hydrology, ecology, noise, land use, waste, etc.
- 1.29 Indicative costs will also be identified at this stage. A high-level cost-benefit analysis will be undertaken to ensure the project represents a good use of the Ofgem funding, outlining, where appropriate, the relative economic, environmental, and social value of visual amenity enhancements. This information will be used to select a smaller number of best value projects for detailed development.

Consultation

1.30 Consultation meetings will be held to ensure that stakeholders are content with the analysis being undertaken, and to confirm the final selection of projects to Ofgem.

Detailed project development and submission to Ofgem

- 1.31 Technical projects selected for submission to Ofgem will be fully detailed and costed. A package of information will be drawn together, in consultation with Ofgem, to ensure that all necessary details are presented. We will seek Ofgem's advice on the required content and format of submissions.
- 1.32 Non-technical projects will also be fully developed and costed to a level of detail proportionate to their scale. These will be reviewed as part our standard internal governance process.

Stage 4 Consent and implementation



1.33 It is likely that projects at this stage will require further consultation with stakeholders and statutory consultees to inform detailed design and to ensure that the identified benefits will be fully realised. Mitigation projects may require planning consent, and where these are needed applications will be developed at this stage to meet all required consenting requirements. These may include Environmental Impact Assessment for engineering solutions or larger-scale mitigation measures.

- 1.34 Projects will then be progressed in line with our internal governance process.
- 1.35 Prior to commencement of works we will submit projects to Ofgem for approval in line with internal governance and expenditure control.
- 1.36 Once consents are in place and Ofgem has approved a project, the mitigation measures can be delivered. Longer-term management and maintenance may be required for some solutions, and ongoing monitoring will be carried out to confirm that the expected benefits are delivered.

Consultation

- 1.37 Consultation with stakeholders at every stage of the process is an integral part of the project with particular importance on the development and assessment stage. Section 1.40 provides a summary of the key stakeholders who will be engaged in the consultation process and who have and will be engaged in shaping the policy document. The consultation with stakeholders is to be undertaken primarily through informal discussions held at the stakeholder partnership group forums. This will serve to ensure that the detailed analysis that we are undertaking is in line with the preferences expressed through the stakeholder forums.
- 1.38 In addition to consulting with the stakeholder groups listed we will be working closely with the other UK Transmission Operators (TO's) Scottish Power Energy Networks (SPEN) and National Grid. Quarterly engagement is anticipated, sharing best practice from the consultation process, and providing an opportunity for engagement with the different stakeholder partnership groups established under each TO's initiative.
- 1.39 Consultation with the Loch Lomond and the Trossachs National Park Authority, and interested stakeholders, will be undertaken through a series of forums in line with the project stages outlined. For the Cairngorms National Park and remaining NSA's, sub-group forums will be held for those areas linked geographically, before holding a larger collective stakeholder feedback forum for these areas at the relevant project stages.

1.40 Organisations

- Atholl Estates
- Cairngorms National Park Authority
- Community Councils
- Development Trusts
- Forestry and Land Scotland
- Friends of Loch Lomond and the Trossachs
- Highland Council
- Historic Scotland
- John Muir Trust
- Keep Rannoch Wild
- Loch Lomond and the Trossachs National Park Authority
- Luss Estates
- Mountaineering Council for Scotland
- National Grid
- National trust for Scotland
- Nevis Partnership
- North Harris Development Trust
- Perth and Kinross Council
- RSPB
- Scottish Forestry
- Scottish Government Energy Consents Unit
- SEPA
- Scottish Water
- SNH
- SP Energy Networks
- Visit Scotland
- West Harris Development Trust.



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