



Scottish & Southern
Electricity Networks

TRANSMISSION

www.ssen-transmission.co.uk

Visual Impact of Scottish Transmission Assets (VISTA) RIIIO-T2

Assessing the impact of existing electricity
infrastructure on National Parks and
National Scenic Areas (NSAs) in Scotland

Introduction

Scottish Hydro Electric Transmission plc (SSEN 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.



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 Scottish Ministers. Town and Country Planning (Scotland) Act 1997 applications are determined by the Local Planning Authority.

What is VISTA?

In 2012, the electricity and gas markets regulator (Ofgem) outlined a mechanism to establish a £500m fund in the 2015-2021 price control (RIIO-T1) for UK electricity transmission owners to mitigate the impact of existing electricity infrastructure on the visual amenity of nationally designated landscapes.

This has been very successful to date and as a result, a similar mechanism is being taken forward into the RIIO-T2 price control, covering 2021-2025. A fund of £465m has been established for works during this period.

VISTA (Visual Impact of Scottish Transmission Assets) is a policy initiative designed by SSEN Transmission to assess the visual impact of existing electricity infrastructure on National Parks and National Scenic Areas (NSAs) within the SSEN Transmission network area. It was established in 2016 to help us realise opportunities to conserve and enhance the natural beauty, wildlife and cultural heritage of these landscapes. From the outset, the overall aim of the policy has been to identify the most effective mitigation proposals for which funding can be sought from Ofgem.

Awards from the Ofgem fund have been utilised to further enhance designated landscapes by reducing the visual impact of existing overhead electricity transmission lines and substations. In order to ensure that SSEN Transmission selects the most beneficial proposals, stakeholders have been engaged throughout the process.

What has changed?

This policy document sets out SSEN Transmission's continuing commitment to VISTA and identifies the key objectives for the initiative through the RIIO-T2 period. In 2019, we consulted on our proposed approach to VISTA in the RIIO-T2 period³, as part of wider engagement on "A Network for Net Zero", our RIIO-T2 Business Plan⁴. Our approach to VISTA largely remains the same. The scope of VISTA remains focused on electricity infrastructure within National Parks and NSAs, but also now includes consideration of infrastructure outside these areas, but which has an effect on the special qualities of the designated landscape. We intend to continue to engage with our stakeholders to develop projects in locations which will benefit the most.

The most significant change is the introduction of a new method of funding non-technical projects. SSEN Transmission will directly administer a fund for projects that do not affect the electricity network. This fund will be available for enhancement works that seek to increase natural beauty and enjoyment of National Parks and NSAs in areas affected by SSEN Transmission infrastructure. Further information on how these projects will be developed is presented in this policy document and [Appendix 1](#).

³ Visual Impact of Scottish Transmission Assets (VISTA) Our Approach for RIIO-T2

⁴ A Network for Net Zero: RIIO-T2 Business Plan.

Project progress to date

Following stakeholder involvement at each stage of the VISTA initiative during the RIIO-T1 period, SSEN Transmission selected projects which demonstrated potential benefit to take forward for the application of funding from Ofgem. Priority was given to projects with potential for landscape and visual improvements, which have positive social and environmental impacts, and are economically efficient. To date, we have completed two projects within the Cairngorms National Park, resulting in removal of over 12 km of overhead lines around Nethy Bridge and Boat of Garten. Three projects are under construction within Loch Lomond and the Trossachs National Park, at Glen Sloy, Glen Falloch, and Killin, which together will remove a further 16 km of overhead lines. We have also completed a novel tower-painting project in Loch Tummel NSA which, combined with woodland restructuring, will reduce the visibility of overhead lines in the iconic Queen's View lookout.

Why promote VISTA?

VISTA represents an ongoing opportunity to reassess the historic electricity infrastructure within and, in some instances, in close proximity to National Parks and NSAs, and to conserve and enhance the natural beauty, wildlife and cultural heritage of these important Scottish landscapes. By promoting this initiative SSEN Transmission hopes to ensure that the proposals taken forward not only represent its vision as to where the natural beauty of the landscape can be enhanced, but also give those that live, visit and work in and around the designated landscapes a voice in contributing to the assessment and selection of candidate projects that may be taken forward. This will ensure that the proposals developed are technically feasible and achieve best value for money by targeting the areas with greatest potential for effective mitigation.





Nethy Bridge - Complete

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 (8.3 km).

Cairngorms National Park



Boat of Garten - Complete

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

Cairngorms National Park



Loch Tummel - Complete

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

Loch Tummel NSA



Sloy - In construction

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

Loch Lomond and Trossachs National Park



Glen Falloch - In construction

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

Loch Lomond and Trossachs National Park



Killin - In construction

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

Loch Lomond and Trossachs National Park

Where can SSEN Transmission make a difference?

The 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 SSEN Transmission's existing infrastructure is located outside designated areas, sections of our network cross high amenity landscapes. Through VISTA, SSEN Transmission aims 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 the areas considered amounts to:

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

The number of substations identified within the areas considered, or in close proximity (less than 2 km) amounts to 16.

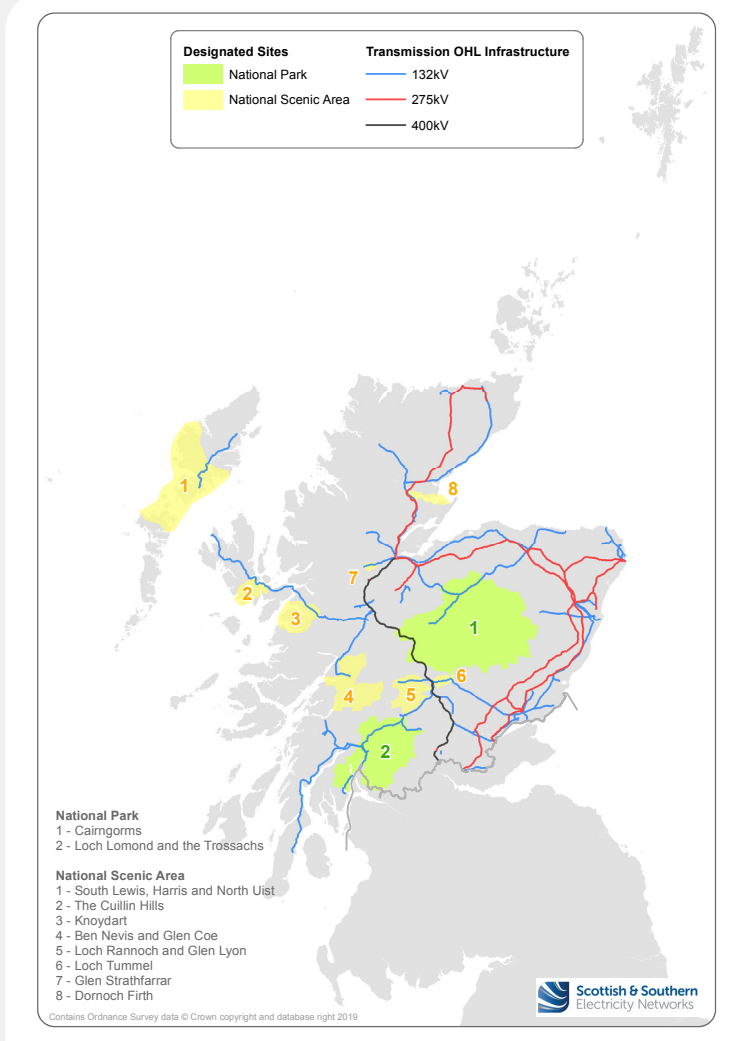


Figure 1: Location of assets and designated areas

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

How can we make a difference?

There are strict criteria that proposed mitigation projects must satisfy in order to qualify for consideration as part of Ofgem's incentive. It is important that SSEN Transmission takes 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 SSEN Transmission's licence obligations under the Electricity Act, the most relevant of these being its duty to maintain its 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. We will seek to secure biodiversity enhancement on all projects through VISTA, in line with our approach to Biodiversity Net Gain.

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. Under the Ofgem mechanism for RIIO-T2, a distinction is made between technical and non-technical approaches to mitigation. Non-technical approaches are those that do not affect the electricity network, but aim to enhance the landscape context.

Examples of technical solutions to mitigate the effects of electricity infrastructure could include:

- Re-routing of existing overhead lines;
- Replacement of steel lattice towers with wood poles; or
- Undergrounding existing overhead lines.

Non-technical mitigation projects (NTMP) that could be taken forward could include:

- Screening visible elements of infrastructure such as substations or overhead lines, for example through woodland planting;
- Mitigation techniques to reduce visibility of towers, such as painting;
- Changes to the visual context to redirect views away from infrastructure, for example by providing a new viewpoint;
- General landscape enhancements which mitigate the impact of transmission infrastructure, and which may also support management plans or other ongoing initiatives, such as woodland creation or restructuring;
- Recreational or social initiatives associated with the use of recognised designated areas, and which can be linked to improvement in visual amenity, for example improvements to access provision; and/or
- Other mitigation measures identified during consultations with stakeholders.

Non-technical projects will need to demonstrate some connection with the impacts of electricity infrastructure. This may include impacts in areas of high amenity outside, but in close proximity to, designated areas.

The fund cannot be used for:

- The construction of new transmission infrastructure;
- Mitigation of impacts of SSEN Transmission infrastructure outside the immediate settings of National Parks or NSAs, and which does not affect the special qualities of designated landscapes;
- Mitigation of impacts on other landscape, cultural heritage and natural heritage designations;
- Reducing visual impact of distribution (i.e. low-voltage) infrastructure; or
- Funding existing landscape enhancement initiatives that are viewed as business as usual; VISTA must show additionality.

Working with Stakeholders

It is recognised that stakeholder involvement 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 will continue to involve as many relevant parties as possible, using both on-line and in-person approaches.

SSEN Transmission will engage with stakeholders and other relevant interest groups, enabling opportunities to contribute to the identification and selection of candidate projects. Engagement will be facilitated 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, as well as setting up new stakeholder groups as necessary.

We recognise that there is potential for SSEN Transmission to work more collaboratively on the delivery of Non-technical Mitigation Projects. This could be through funding of ongoing or planned initiatives, or through partnering on the delivery of projects. Stakeholders have the opportunity to put forward projects for inclusion within VISTA. More detail about how SSEN Transmission will make decisions about these projects is provided in [Appendix 3](#).

Both SSEN Transmission 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.

Since November 2018 we have sought stakeholders' views on how VISTA should be delivered in the future, and we published our "Visual Impact of Scottish Transmission Assets (VISTA): Our Approach for RIIO-T2" in December 2019. As part of updating this Policy Document in 2021 we invited comments from core stakeholders, including those who provided input to the T1 schemes. We also presented the intended changes to the Policy Document at an on-line discussion meeting. An overview of the comments received and how these have been incorporated into our policy is included in [Appendix 2](#).

Aims of the Stakeholder Forums

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 SSEN Transmission should take to development phase;

Capture learning from delivery of RIIO-T1 projects to ensure benefits are maximised;

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

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

How will SSEN Transmission take forward VISTA?

SSEN Transmission is committed to preserving the beauty of the Scottish countryside and will seek to promote selected projects that will help to enhance Scotland's most precious landscapes, without giving rise to adverse impacts on other receptors that would outweigh the benefit of the mitigation. By way of example, while undergrounding existing overhead lines can improve visual amenity, it can also cause adverse impacts on habitats that may also be designated.

SSEN Transmission aims to consider carefully potential projects/proposals referring to key selection criteria which will:

- ✓ deliver the most beneficial enhancements for Scotland's precious landscapes while keeping undesirable environmental impacts associated with particular mitigation measures (such as habitat impacts of undergrounding) to a minimum;
- ✓ enable users of National Parks and NSAs to benefit from their recreational, educational and social offering;
- ✓ provide wider benefits in addition to landscape mitigation (such as biodiversity enhancement);
- ✓ protect the technical viability of the wider transmission network;
- ✓ be economical and efficient; and
- ✓ involve a wider range of stakeholders.



Core values

In addition to the criteria outlined above, SSEN Transmission will also develop projects identified under the VISTA initiative in line with SSE's core company values, which are as follows:



Safety

Any projects undertaken will be carried out safely and responsibly, minimising harm to the immediate environment.

Service

Service Engagement will be facilitated through the VISTA website, social media, stakeholder forums, and written consultation.

Efficiency

Selected proposals will seek to make the most of the fund available from Ofgem. We will ensure that chosen projects are achievable, technically feasible and add the most value, having regard to Ofgem's criteria, whilst avoiding wasting resources.

Sustainability

Selected projects will represent SSEN Transmission's long term commitment to make a positive difference by conserving and enhancing natural beauty, wildlife and cultural heritage.

Excellence

We will aim to choose effective options that present value for customers, as assessed by Ofgem through the funding application, while utilising innovative techniques to improve the visual impact of the existing networks.

Teamwork

To ensure that all views are heard, we will collaborate with a wide range of stakeholders, including SPEN and National Grid.

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.

During the RIIO-T1 price control, SSEN Transmission developed an approach based on four key stages that has been successfully applied to the development of the projects outlined above. Having reviewed this approach and its outcomes, we intend to retain this basic structure, which is shown in Figure 2 below. The steps within each stage have ensured that proposals meet the scheme requirements, are prioritised effectively and consistently, provide evidenced value (from a landscape and economic perspective) and meet stakeholder expectations.

Development stages



Figure 2 Stages for project development.

For the RII0-T2 price control, SSEN Transmission will re-establish priorities across our network (Stage 1), recognising that changes since 2016 may have altered the context in which the impacts of infrastructure and the potential for mitigation may be viewed. There is no change to the scope of VISTA, which remains focused on National Parks and NSAs, including areas in close proximity to their boundaries where infrastructure may affect their special qualities.

At Stage 2, following identification of priority areas, we will engage with local groups through targeted stakeholder forums. Decisions will be made at this stage whether to progress a technical mitigation solution, such as undergrounding, or a landscape-led non-technical mitigation project (NTMP). This decision will be based on analysis of likely effectiveness, wider impacts and cost, taking on board stakeholder views.

During development and implementation of projects (Stages 3 and 4), it is envisaged that technical and non-technical projects will be taken forward in slightly different ways.

Development of technical projects will be led by SSEN Transmission, with engagement of stakeholders to ensure project objectives are met. NTMP projects may be developed and implemented by SSEN Transmission in consultation with stakeholders, or they may be undertaken in collaboration with stakeholders such as community interest groups. There will be opportunities for stakeholder groups to bring projects into VISTA, including by seeking funding for existing proposals. SSEN Transmission will make decisions about NTMP funding using clear criteria, and will undertake monitoring of implemented proposals. More information on working with stakeholders on NTMPs is provided in [Appendix 3](#).

We will take opportunities to deliver biodiversity enhancement as part of VISTA projects, and will secure their ongoing management to ensure successful implementation without creating a burden for communities in the long term.

Further detail on each of these stages is included in [Appendix 1](#).

SSEN Transmission will provide updates on project progress via our dedicated VISTA website, including both technical and non-technical projects, as they progress through design, funding approval, and implementation. We are committed to openness and transparency, and we will publish relevant and appropriate material on the decisions we make about VISTA projects. We will also provide an annual overview of the progress we have made on all VISTA projects, and the benefits that have been delivered. As we progress through the stages, we will provide updates as to our anticipated timetables for meeting key milestones, and opportunities for stakeholders to engage with us, across the technical and non-technical projects being developed.



Summary

VISTA represents an ongoing opportunity to reassess the historic electricity infrastructure within, and 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 RII0-T2 we will continue early and proactive engagement with our stakeholders, bringing forward technical and non-technical schemes for future delivery.

Consultation

SSEN Transmission is keen to receive feedback from stakeholders and other interested parties throughout the VISTA project. Should you wish to contact us about our approach to prioritising and developing future projects, or about our current mitigation projects, we would like to hear from you.

Ways to contact us:

Post: The VISTA Initiative Team
SSEN Transmission
Corporate Affairs
Inveralmond House
200 Dunkeld Road
Perth
PH1 3AQ

Email: TransmissionSupport@sse.com

Website: <https://www.ssen-transmission.co.uk/sustainability-and-environment/vista>



Scottish & Southern
Electricity Networks

Appendix 1: Applied methodology for developing mitigation projects

Background

- 3.1 Scottish Hydro Electric Transmission Plc ("SSEN Transmission") is promoting VISTA (Visual Impact of Scottish Transmission Assets), an initiative instigated to assess the impact of existing electricity infrastructure in the ownership of SSEN Transmission 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, SSEN Transmission hopes to access a proportion of the fund that is administered by the electricity industry regulator Ofgem.
- 3.2 This annex to the policy document provides further detail on the ways in which the policy will be applied and how 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.
- 3.3 The four stages outlined below have ensured that proposals meet the scheme requirements, are prioritised effectively and consistently, provide evidenced value (from a landscape and economic perspective) and meet stakeholder expectations.
- 3.4 In the RIIO-T2 period, Ofgem will allocate 2.5% of the overall fund for Transmission operators to implement non-technical mitigation projects (NTMPs). The share of this fund that SSEN Transmission will administer is capped at £11.6m. The principles set out in this Annex will apply to these NTMPs, with some variations that are highlighted through the approach. . Additional information about how we will work with stakeholders to deliver NTMPs are provided in [Appendix 3](#).

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

1

Identifying Priorities

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

2

Defining the Projects

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

3

Developing the Projects

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

4

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

- 3.5 SSEN Transmission owns and operates 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. This network comprises almost 5,300 km of electricity lines and cables, and serves around 70% of the land mass of Scotland.
- 3.6 The 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 40 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.
- 3.7 Both National Parks and the majority of the NSAs fall within SSEN Transmission's licence area. The majority of SSEN Transmission's existing 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

- 3.8 Any project that has been consented as a 'new build' 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. Assets ruled out on this basis include the section of the Beaully-Denny line that runs through the Cairngorms National Park.

- 3.9 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, insulators, or tower strengthening, will be included within the scope of VISTA where these works are unlikely to alter the impact of the assets on designated landscapes.

Initial landscape and visual assessment

- 3.10 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 SSEN Transmission infrastructure.
- 3.11 This process has been undertaken across the SSEN Transmission network during the initial implementation of VISTA. It is not considered necessary to repeat the entire process, but a review and selected update will be undertaken to ensure any changes are taken account of.

- 3.12 The key steps that were undertaken for each designated area, and which will be revisited as necessary, 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; and
 - Identification of potential mitigation and likely level of benefit.
- 3.13 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.
- 3.14 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 routing of overhead power lines.

Identify most important impacts

- 3.15 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

- 3.16 At this stage, initial consultation will be undertaken to gather feedback from stakeholders on:
- Scope of the initiative;
 - Updated 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

- 3.17 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.
- 3.18 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?

- 3.19 The consultation process is outlined below and includes a list of stakeholders that SSEN Transmission intends to engage with as part of the consultation process.
- 3.20 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. SSEN Transmission 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

- 3.21 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.
- 3.22 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 SSEN Transmission teams, specialising in 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, species, cultural heritage and where appropriate, carbon. Those projects that are unlikely to deliver a net benefit will not be taken forward.

Technical and non-technical mitigation

- 3.23 At this stage, it will become apparent whether the best approach in a given area would be a technical or a non-technical solution. Non-technical approaches (NTMPs) will be funded differently, and will be developed with a slightly different focus. Locations where NTMPs are considered appropriate will be identified at this stage, and local stakeholders will be canvassed as to their opinion on the most appropriate implementation model for such schemes. This may not be the same for each scheme and will depend upon the complexity, programme, and existing delivery capability of the respective parties.
- 3.24 SSEN Transmission will develop a 'toolkit' of typical NTMP options to mitigate effects, that could be developed and applied in different landscape contexts. Such options could include:
- Screening visible elements of infrastructure such as substations or overhead lines, for example through woodland planting;
 - Mitigation techniques to reduce visibility of towers, such as painting;
 - Changes to the visual context to redirect views away from infrastructure, for example by providing a new viewpoint;
 - General landscape enhancements which mitigate the impact of transmission infrastructure, and which may also support management plans or other ongoing initiatives, such as woodland creation or restructuring; and/or
 - Recreational or social initiatives associated with the use of recognised designated areas, and which can be linked to improvement in visual amenity, for example improvements to access provision, establishing picnic areas/recreational facilities, or other options that enhance community based participation.

3.25 The 'toolkit' will be flexible enough to allow for bespoke solutions to be developed in response to particular impacts or locations, and will allow for combining different approaches as required. Non-technical projects will need to demonstrate some connection with the impacts of electricity infrastructure. This may include impacts in areas of high amenity outside, but in close proximity to, designated areas.

Selection of infrastructure and mitigation proposals

3.26 Outline information will be developed on a selected 'long list' of mitigation projects. Separate technical and NTMP lists will be prepared, and it may be that some locations appear on both long lists initially. 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 SHE Transmission engineers.

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

Consultation

3.28 Consultation meetings will be held at this stage to discuss the 'long lists' 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.

3.29 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.

3.30 The outcome of these consultations will be 'short lists' of technical and NTMP projects which are beneficial, feasible, and which have a degree of stakeholder support.

Stage 3 Develop the projects



Review priority proposals sections in more detail

3.31 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.

Feasibility of technical projects

- 3.32 SSEN Transmission will undertake a more detailed technical feasibility study of each of the short listed technical projects, to ensure that they are deliverable and would not result in adverse effects on network resilience.
- 3.33 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.
- 3.34 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. Where opportunities arise, we will seek to build biodiversity enhancement in to all VISTA schemes.

Development of NTMPs

- 3.35 It is anticipated that most NTMPs will arise from the identification of priority areas and subsequent proactive engagement of stakeholders by SSEN Transmission. However, it is possible that local interest groups may, on their own initiative, bring forward projects. We welcome such local initiatives, which will be included in the lists of projects for consideration and further development.

- 3.36 NTMP solutions will be developed in close collaboration with stakeholders. We will ensure that local interests steer the projects to ensure maximum local benefit and value for money.
- 3.37 Should few or no NTMPs be established following the initial short listing stage, SSEN Transmission will seek to re-engage with local stakeholders later in the RIIO-T2 price control period. In addition, stakeholder-led initiatives may be brought forward at any time during the RIIO-T2 period.

Consultation

- 3.38 Consultation meetings will be held at this stage to ensure that stakeholders are content with the analysis being undertaken, and to confirm the final selection of projects to Ofgem. As noted above, NTMPs will be developed through more intensive consultation with local stakeholders. This is likely to involve engagement with community councils, landowners, and other local representatives. Wider stakeholders will be kept informed of progress of both technical and NTMP schemes.

Detailed project development and submission to Ofgem

- 3.39 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. SSEN Transmission will seek Ofgem's advice on the required content and format of submissions.

Stage 4 Consent and implementation



Technical projects

- 3.40 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.
- 3.41 Projects will then be progressed in line with SSEN Transmission's internal development governance.
- 3.42 Prior to commencement of works SSEN Transmission will submit projects to Ofgem for approval in line with internal governance for project development and expenditure control.
- 3.43 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.

Implementation of NTMPs

- 3.44 Through the collaborative arrangements established at Stage 3, SSEN Transmission will guide projects to a position where they can be implemented.

3.45 NTMPs will be developed and costed to a level of detail proportionate to their scale. NTMPs do not need to be submitted to Ofgem for approval, and final approval will follow SSEN Transmission internal governance processes, which is tailored to be proportionate to the value of the proposed mitigation scheme. We will consider the following aspects when making decisions about NTMPs:

- The effectiveness of the proposal in providing mitigation that reduces or offsets the impacts of electricity infrastructure on views and the landscape;
- Wider environmental benefits of the proposal e.g. for biodiversity or carbon sequestration, and potentially including biodiversity net gain;
- Wider social or economic benefits of the proposal;
- Any potential for adverse environmental effects arising from the proposal;
- Any requirements for ongoing maintenance of the proposals; and
- Practical considerations including delivery methods, consenting requirements, and monitoring of outcomes.

3.46 Where it is clear at an early stage that an existing project meets the VISTA objectives it may be possible to 'fast-track' its delivery as an NTMP. SSEN Transmission will consider all practical approaches to delivery to facilitate projects with certainty and efficiency. SSEN Transmission may implement projects directly, or may choose to provide support to other organisations, retaining an oversight role to ensure that scheme objectives are met. We will seek to ensure long-term management of projects so that their benefit is secured.

Approach to Consultation

- 3.47 Consultation with stakeholders at every stage of the process is an integral part of all stages of VISTA. The list below provides a summary of the key stakeholders who were engaged in the VISTA process during RIIO-T1. SSEN Transmission will continue to engage with these groups, as well as proactively seeking to engage more widely and more locally.
- 3.48 The consultation with stakeholders is to be undertaken primarily through informal discussions held at the stakeholder forums. This will serve to ensure that project selection and development is in line with the preferences expressed through the stakeholder forums.
- 3.49 In addition to consulting with stakeholder groups, SSEN Transmission will be working closely with the other UK Transmission Operators (TOs) – 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 groups established under each TO's initiative.
- 3.50 Consultation to date has focused on two main groups, one covering the Loch Lomond and the Trossachs National Park, and a second covering the Cairngorms National Park and the NSAs across northern Scotland. Smaller local forums were held to discuss particular areas and projects. A similar approach will be taken for RIIO-T2, combining local groups who will contribute to the development of specific projects, with wider stakeholder forums who will provide more strategic advice on priorities. We will seek to ensure a balance between strategic steering by national or regional stakeholders, and securing local benefit through engagement at a community level across all the designated landscapes.

- 3.51 Information will be published on SSEN Transmission's VISTA website, including progress updates on the development and delivery of active projects.

List of key organisations who have contributed to VISTA to date

- Cairngorms National Park Authority
- 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 Trust for Scotland
- Nevis Partnership
- Perth and Kinross Council
- RSPB
- Scottish Forestry
- Scottish Government - Energy Consents Unit
- SEPA
- Scottish Water
- Nature Scot
- Visit Scotland

Appendix 2: Stakeholder input

The table below summarises the key themes of stakeholder input to the development of our approach to VISTA in the RIIO-T2 period, as set out in this Policy Document.

Comments received	How we have addressed the comments
Projects delivered in T1 have been successful and well received.	We have retained the same approach to technical schemes to reflect the success of this approach in T1, as set out in Appendix 1 .
Can the scheme be applied outside National Parks and NSAs, what about Wild Land Areas?	The scope of VISTA is limited to National Parks and NSAs. However, it can be applied to electricity infrastructure outside the designated areas which affects the special qualities of the designation, and this has been clarified on (pages 2, 11 and 14).
Online consultation has been effective during the Covid-19 pandemic, but should not replace in-person engagement in the long term.	Our approach anticipates a mix of online and in-person engagement to reach the maximum range of stakeholders (page 7).
A focus on Biodiversity Net Gain should be highlighted in the policy.	We have set out our commitment to seeking biodiversity enhancement as part of all VISTA schemes (page 6). Our commitment to Biodiversity Net Gain is set out in our publication "A Network for Net Zero: Our Approach to Implementing Biodiversity Net Gain" (December 2019).
Include further explanation or examples to illustrate what is meant by non-technical projects, while keeping options open.	The wording on (pages 6 and 16) has been amended to include examples of the different types of project that may be taken forward as NTMPs. We have not closely defined these in order to retain flexibility to consider other types of project that may come forward in future. In addition we have proposed the development of a 'toolkit' which can be used to inform options for NTMPs.
Projects could provide even greater benefits to the environment and communities (e.g. provision for recreational users, and opportunities for community based participation).	We have added these examples to our list of potential options for the NTMPs on (Pages 6 and 16).
The policy should define more clearly the potential for incorporating assets that impact on the setting of designated landscapes.	We have defined the scope in the text as including all infrastructure that currently has an effect on the special qualities of the National Park or NSA (pages 2, 11 and 14).
Long-term maintenance of projects should be included, so the benefits are sustained in the future.	We have added explanation confirming that we will seek to secure long-term maintenance and management as part of project funding, and will undertake monitoring to ensure projects are implemented effectively (page 11).
Non-technical schemes could also include changing the landscape context to redirect views away from infrastructure.	This type of project could offer effective mitigation and is included in the list of example projects on (page 6).
Support for retaining flexibility on defining and delivering the non-technical schemes.	This flexible approach is set out on (page 11) and in Appendix 1 .
Criteria for selection of non-technical projects should be set out.	We have included criteria on (page 19).
Stakeholder engagement should incorporate further learnings from RIIO-T1 delivery, to help inform detail of proposals in RIIO-T2.	We have emphasised the importance of learning from previous projects in our stakeholder commitments on page 7.

Appendix 3: Non-Technical Mitigation Projects

- 3.1 This Appendix provides additional information on how SSEN Transmission will work with third parties to develop and deliver NTMPs.
- 3.2 In the RIIO-T2 period, Ofgem will allocate 2.5% of the overall fund for Transmission operators to implement non-technical mitigation projects (NTMPs). The share of this fund that SSEN Transmission will administer is capped at £11.6m.
- 3.3 SSEN Transmission welcomes approaches from stakeholder groups who wish to access this funding, whether for ongoing initiatives or for new projects. We will consider all such approaches against the criteria that are set out in this Appendix, and provide clear justifications for the decisions we make. SSEN will make the final decision on whether a proposal can be put forward to Ofgem for funding under the VISTA initiative.

Bringing a Project to VISTA

- 3.4 We welcome approaches from all organisations who have an interest in the enhancement of Scotland's finest landscapes. Examples of the type of project that could be delivered as an NTMP, in collaboration with stakeholders, include:
- Screening visible elements of infrastructure such as substations or overhead lines, for example through woodland planting;
 - Changes to the visual context to redirect views away from infrastructure, for example by providing a new viewpoint, or creating new or diverted footpaths;
 - General landscape enhancements which mitigate the impact of transmission infrastructure, and which may also support management plans or other ongoing initiatives, such as woodland creation or restructuring;
 - Recreational or social initiatives associated with the use of recognised designated areas, and which can be linked to improvement in visual amenity, for example improvements to access provision; and/or
 - Other mitigation measures identified during consultations with stakeholders.
- 3.5 We will not consider projects that require any changes to our infrastructure for delivery under this process. However, suggestions for this type of project can be made to the VISTA team and will be considered for delivery by SSEN Transmission under the technical projects process.

Information we need

3.6 In order to be able to make decisions about funding, we expect that projects are developed to a sufficient level of detail. We would expect to see as part of a proposal:

- The location of the project, including the National Park or NSA where it is located;
- A statement setting out how SSEN Transmission infrastructure impacts on the area;
- A description of the project, i.e. what is proposed?
- Information about the benefits of the project, explaining:
 - > how will the project address the impacts of SSEN Transmission infrastructure?
 - > how will the project benefit the National Park or NSA landscape?
 - > what other benefits will the project have?
- Information about costs – a detailed costing will not be required, but an estimate of the total project costs should be provided. This should include all costs associated with developing and delivering the project, including any long-term management requirements; and
- Evidence of support – we need to see that the proposal would be supported by the local community and/or other stakeholder groups.

3.7 While SSEN Transmission cannot prepare your proposal, we can provide advice if you are looking to submit a project for consideration. We will only accept submissions from established organisations with a track record of delivering landscape enhancement projects at a similar scale, and with a demonstrable appreciation of landscapes and views. Proposals that only benefit private interests will not be considered or funded.

How we will make decisions

3.8 Decisions about projects will be guided by the VISTA selection criteria that are set out in this Policy Document. We will apply these criteria to projects submitted for review in line with the considerations set out below.

- **deliver the most beneficial enhancements for Scotland's precious landscapes while keeping undesirable environmental impacts associated with particular mitigation measures to a minimum.**
 - > Will the project meet the primary VISTA aim of enhancing the landscape and views?
 - > Will the project reduce the impact of SSEN Transmission infrastructure?
 - > Will the project give rise to any negative impacts on landscape or views, in the short or long term?
 - > Will the project give rise to any other negative environmental impacts? (We may consult with other stakeholders, such as Nature Scot, to inform our assessment on this point)
- **enable users of National Parks and NSAs to benefit from their recreational, educational and social offering.**
 - > Will the project provide improved access opportunities, either generally or for particular users or groups?
 - > Will the project provide opportunities for better engagement with and understanding of the landscape?
 - > Will the project contribute to local communities, either socially or economically?

- **provide wider benefits in addition to landscape mitigation (such as biodiversity enhancement);**
 - > Will the project provide benefits for biodiversity?
 - > Does the project ensure Biodiversity Net Gain?
 - > Does the project provide other natural capital benefits, such as flood management or carbon storage?
- **protect the technical viability of the wider transmission network;**
 - > As noted above, projects that affect SSEN Transmission assets will not be funded through the NTMP mechanism.
- **be economical and efficient**
 - > Does the project represent value for money, with a level of spend proportionate to the anticipated benefits?
 - > Is there evidence of reliable cost estimates?
 - > Does the project require planning permission, or other consents or licenses?
 - > Can the project outcomes be monitored to ensure successful delivery?
 - > Is long-term management required, and if so can this be funded without placing a burden on communities?
- **involve a wider range of stakeholders.**
 - > Will the project benefit communities of place and/or communities of interest as a whole, rather than narrow sections or single user groups?
 - > Is there evidence that projects have received inputs or support from wider interest groups.

How projects will be delivered

- 3.9 There is no upper limit on the value of a single project, and no requirement for third parties to secure match-funding. However, we would wish to fund a number of projects from within the £11.6 million that is available.
- 3.10 SSEN Transmission need to secure delivery of projects funded through this initiative, as we are accountable to Ofgem for money distributed. We will therefore work closely with delivery groups to ensure we remain up-to-date on progress and plans.
- 3.11 There will be a presumption that projects with a value greater than £250,000 will be delivered by SSEN Transmission directly, in order to reduce delivery risks. However, SSEN Transmission reserve the right to deviate from this presumption where confidence in delivery can be demonstrated by the third party for projects over £250,000, or where delivery risks are identified for projects under £250,000.
- 3.12 Where projects are proposed to be delivered by a third party, we will require evidence of relevant experience and financial stability, as well as a credible mechanism for delivery. We will enter into agreements with delivery partners on a case-by-case basis.
- 3.13 SSEN Transmission is committed to transparency and we will monitor progress during planning, delivery and maintenance of projects that we fund. We will feed this information into our updates on progress and plans, which will be prepared for our stakeholders. Further detail on this commitment to transparency is outlined in the main policy.



Scottish & Southern
Electricity Networks

TRANSMISSION



SSEN Community



@ssencommunity

ssen-transmission.co.uk

