

Pre-Application Consultation Report

Beauly to Blackhillock to New Deer to Peterhead 400 kV OHL Project

September 2025



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1. INTRODUCTION

1.1 Purpose of this Report

- 1.1.1 Scottish Hydro Electric Transmission plc ('the Applicant') who, operating and known as Scottish and Southern Electricity Networks Transmission ('SSEN Transmission'), own, operate and develop the high voltage electricity transmission system in the north of Scotland and remote islands. SSEN Transmission holds a license under the Electricity Act 1989 to develop and maintain an efficient, coordinated and economical system of electricity transmission.
- 1.1.2 The Applicant is seeking consent under Section 37 to the Electricity Act 1989 (as amended) to construct and operate approximately 186 kilometres (km) of new double circuit steel structure 400 kilovolt (kV) overhead line (OHL) to connect into new substation sites at Beaully, New Deer and Peterhead. The project is referred to as the Beaully to Blackhillock to New Deer to Peterhead 400 kV OHL Project (the 'Proposed Development'). A full description of the Proposed Development and its ancillary works is set out within **Volume 2, Chapter 3: Project Description** of the Environmental Impact Assessment Report (EIAR) that accompanies the Section 37 application.
- 1.1.3 There is no statutory requirement to undertake formal pre-application consultation (PAC) for applications made under Section 37 of the Electricity Act 1989, however, for all Section 37 applications that require Environmental Impact Assessment (EIA), the Scottish Government Energy Consents Unit (ECU) recommends, through its Good Practice Guidance¹, a voluntary approach to PAC that generally aligns with the compulsory process prescribed for national and major development applications under the Town and Country Planning (Scotland) Act 1997.
- 1.1.4 Prior to the PAC process, SSEN Transmission carried out public consultation for the corridor, route and refined route stages as part of our development process. The purpose of this document is to describe the PAC process SSEN Transmission has undertaken for the Proposed Development, with reference to the content requirements of PAC Reports as described in Table 1 of Section 3.2 of the ECU Good Practice Guidance¹ and provided below in **Table 1.1**. In doing so, we demonstrate that SSEN Transmission has met the expectations of the Guidance in carrying out meaningful engagement at the earliest possible stage with communities and groups potentially affected by development proposals.
- 1.1.5 The requirements of PAC Reports are listed in **Table 1.1** below, along with commentary of where in this Report confirmation of that information can be found.

Table 1.1: PAC Report Requirements Table

PAC Report requirement	Brief Summary / Location of information in this Report / Appendix
the dates and places where public events were held;	Appendix E, H, K
a description of any additional steps taken by the applicant to consult with members of the public regarding the development;	Appendix A, J
a list of bodies, groups and organisations who were consulted by the applicant and a description of how they were consulted;	Appendix I

¹ See Section 3.2 of Scottish Government: Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989. (updated July 2022). Available at: <https://www.gov.scot/publications/good-practice-guidance-applications-under-sections-36-37-electricity-act-1989/>

PAC Report requirement	Brief Summary / Location of information in this Report / Appendix
a description of any materials sent to consultees and materials provided to those attending public events;	Appendix B, C, F, L
copies of any visual presentation shown or displayed at a public event, and photographs of any display boards or models at public events;	Appendix D, G, M
confirmation as to whether consultees and attendees at public events were informed that pre-application consultation does not remove the right or the potential need to comment on the final application once it is made to the Scottish Ministers;	Appendix E, F, H, K, L
a summary of the written responses to consultations and views raised at public events, including an indication of the number of written responses received and the number of persons who attended the public events;	Appendix A, J
an explanation of how the applicant took account of views raised during the pre-application consultation process;	Appendix A
an explanation of how members of the public were given feedback on the applicant's consideration of the views raised during the pre-application consultation process.	Appendix A

1.2 Structure of this Report

1.2.1 The PAC Report is comprised of seven parts:

1. *Introduction*: sets out the purpose of the Pre-Application Consultation Report;
2. *Proposed Development*: outlines the background to the project and provides a description of the key elements;
3. *The Consultation Process*: describes the framework for consultation and methods which have been employed;
4. *Pre-application consultation PAC 1: Consultation Responses, Key Issues and How the Project Responded* – describes how the comments and issues raised during PAC 1 events were addressed by the project;
5. *Pre-application consultation PAC 2: Consultation Responses, Key Issues and How the Project Responded* – describes how the comments and issues raised during PAC 2 events were addressed by the project;
6. *Coachford Proposed Alignment Design Changes: Consultation Responses, Key Issues and How the Project Responded* – describes how the comments and issues raised during the events were addressed by the project; and
7. *Conclusions*– provides a summary of the conclusions reached.

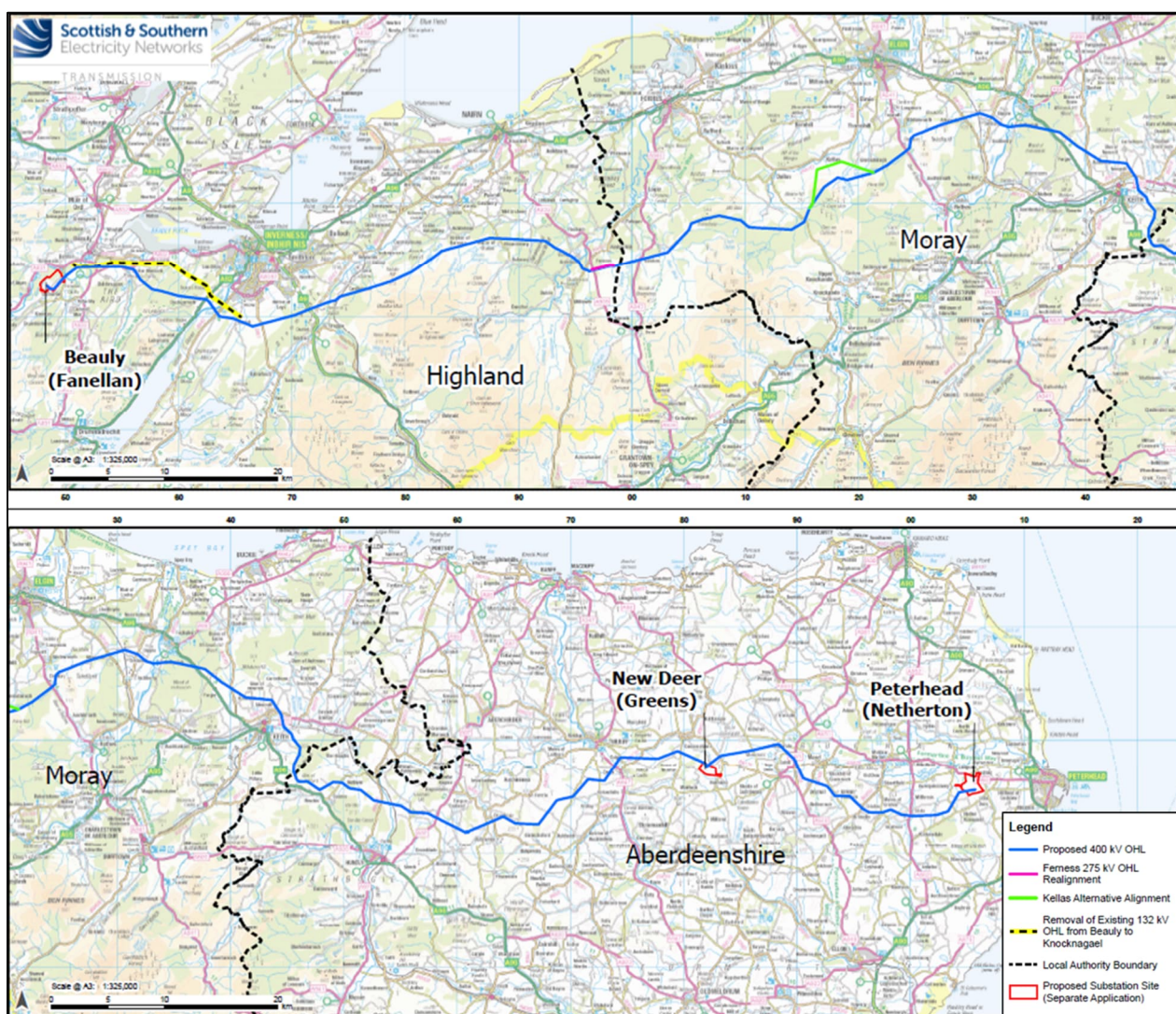
1.2.2 Appendices are attached to provide evidence of consultation carried out.

2. THE PROPOSED DEVELOPMENT

2.1 Project Background

- 2.1.1 SSEN Transmission is applying for consent under Section 37 of the Electricity Act 1989 for the Proposed Development, as shown in **Plate 1: Site Location Overview** below. For further detail, refer to **EIAR Volume 3, Figure 1.1 Site Location Overview**.

Plate 1: Site Location Overview



- 2.1.2 The Proposed Development falls within the administrative areas of The Highland Council, Moray Council, and Aberdeenshire Council.

2.2 Need for the Proposed Development

- 2.2.1 The Proposed Development is required due to technical and economic need as shown from: (i) a transmission system planning exercise encompassing the entire National Grid (considering the upgrades necessary to accommodate the UK generation and demand requirements); and (ii) the regulatory approval from Ofgem as part of its ongoing assessment process. For further detail, refer to **EIAR Volume 2, Chapter 2: Project Need**.

2.3 SSEN Transmission Route Selection Process

- 2.3.1 The approach to the route selection was informed by SSEN Transmission's guidance 'Procedures for Routing Overhead Lines and Underground Cables of 132 kV and above', hereafter referred to as the 'Routing

Guidance'. The Routeing Guidance sets out SSEN Transmission's approach to selecting a route for an OHL or underground cable development, refer to **EIAR Volume 2, Chapter 4: The Routeing Process and Alternatives, Section 4.4** for further details on the routeing process. This document helps SSEN Transmission to meet its obligations under Schedule 9 of the Electricity Act 1989, which requires transmission license holders to:

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

2.3.2 The Routeing Guidance aims to balance environmental, technical and economic considerations throughout the route options process.

2.3.3 The guidance splits a project into the following stages:

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

2.3.4 The stages that are carried out can vary depending on the type, nature and size of a project and consultation is carried out at each stage of the process as appropriate.

2.3.5 The following consultation was undertaken as part of the project development process for the Proposed Development:

- Corridor Consultation (Sept 2022) (Routeing Guidance Stage 1);
- Route Consultation (April 2023) (Routeing Guidance Stage 2);
- Refined Routeing (February 2024)
- Alignment Consultation PAC 1 (May 2024) (Routeing Guidance Stage 3); and
- Alignment Consultation PAC 2 (February 2025)
- Alignment Consultation for design amendments due to no longer proceeding with the Blackhillock 2 (Coachford) substation as part of the wider project (June 2025)

2.3.6 Prior to the alignment selection stage, consultation on refined routes was also undertaken. Two 'rounds' of PAC events to consult on the alignment were held, with the second given in part to providing feedback from the first round.

2.3.7 Following the decision to no longer proceed with the Blackhillock 2 (Coachford) substation as part of the wider Beaully to Blackhillock to New Deer to Peterhead 400 kV Project, an additional round of consultation was held, at venues in Keith and Cairnie, to present the proposed alignment design changes in the specific local area where the project changes were made.

3. THE CONSULTATION PROCESS

3.1 Overview

- 3.1.1 This section describes the methods employed during the consultation process and provides information on meetings and events held with stakeholders in order to obtain feedback and help inform the project development. As described in **Section 2.3**, consultations were undertaken at the corridor, route and refined route, and the alignment stage. These are detailed in the following sections.
- 3.1.2 The Scottish Government's Good Practice Guidance states the expectation that applicants *"hold at least two public consultation events prior to submitting the application. The final public event taking place at least 14 days after the first public event. The public events are to give members of the public the opportunity to make comments to the applicant as regards the proposed development. At the final public event, the applicant should provide feedback to members of the public in respect of comments received by the applicant regarding the proposed development."*
- 3.1.3 In this report, the two pre-application consultation events are described, respectively, as PAC 1 and PAC 2 consultation. The additional Coachford Proposed Alignment Design Changes pre-application consultation events are also described in this report.
- 3.1.4 It should be noted that the routeing, refined routeing and PAC 1 alignment consultation events discussed within this PAC Report were used to display information and allow feedback relative to the Fanellan 400kV Substation and Converter Station², the previously proposed Blackhillock 2 (Coachford) Substation, Greens Substation³, and The Netherton Hub projects⁴.
- 3.1.5 At the PAC 2 alignment consultation stage, during the Longside event, information was displayed regarding the Netherton Hub Tie-ins⁵ and Rebuild⁶. This approach was taken given the intrinsic connection between the proposed substations and the Proposed Development. The event locations chosen ensured that events would be held within each of the local authorities in which the projects are proposed, namely The Highland Council, Moray Council, and Aberdeenshire Council. To avoid confusion, project-specific information was produced in respect of each prospective submission, and there was clear separation of project information at each event with clearly identifiable physical separation between the projects consisting of their own materials and project specific staff in attendance to provide project specific information.

3.2 Corridor and Route Consultations

- 3.2.1 As a stakeholder-led business, we understand the importance of involving communities and other key stakeholders throughout each stage of our project development process. Relevant and insightful stakeholder feedback collected during consultations is critical to ensuring that our decision making is informed, and stakeholder concerns are taken into consideration at each stage of the project's development. As such, prior to Pre-Application Consultation (PAC), public consultation events were undertaken at the following stages and dates:
- Corridor (September 2022);
 - Route (April 2023); and
 - Refined Route (February to March 2024).
- 3.2.2 Consultation at the Corridor, Route and Refined Route stages ensured that stakeholder feedback could be addressed during project development prior to further refinement. The Reports on Consultation (ROC)

² www.ssen-transmission.co.uk/fanellan

³ www.ssen-transmission.co.uk/greens

⁴ www.ssen-transmission.co.uk/netherton-hub

⁵ Netherton Hub 400kV Overhead Line Connection to New Deer and Peterhead - Tie-in Connection - SSEN Transmission

⁶ Netherton Hub 400kV Overhead Line Connection to New Deer and Peterhead Rebuild - SSEN Transmission

published following each stage of consultation outline the consultation process undertaken, alongside summaries of feedback received, our response and next steps. Feedback from Refined Route consultation was incorporated into our Alignment RoC following PAC 1 consultation events.

- 3.2.3 All consultation materials related to the Corridor and Routeing consultation events are available to download from the Proposed Development's webpage⁷.

3.3 Pre-application Consultation - PAC 1

- 3.3.1 The purpose of the PAC 1 consultation events was to present our approach to developing the project, including changes made since we last engaged (Refined Routeing) and to seek feedback on our potential alignments alongside any considered alternatives.
- 3.3.2 To support the PAC 1 consultation events, a Consultation Booklet was prepared and published in May 2024 and uploaded to the project webpage. The Consultation Booklet provided project context and details and sought comments from stakeholders and members of the public on the Proposed Development. See **Appendix C: Consultation Booklet PAC 1**.
- 3.3.3 The consultation events took place at the following venues and dates / times provided in **Table 3.1**.

Table 3.1: Pre-application Consultation PAC 1 Events

Venue	Date and Time
Longside Parish Church Hall, Inn Brae, Longside. AB42 4XN	Wednesday 22 May 2024 – 2-7pm
New Deer Public Hall, Fordyce Terrace, New Deer, Aberdeenshire, AB53 6WE	Thursday 23 May 2024 – 2-7pm
Baden Powell Centre, Baden Powell Road, Turriff, AB53 4FA	Monday 27 May 2024 – 3-7pm
Cairnie Memorial Hall, Cairnie, AB54 4TQ	Tuesday 28 May 2024 – 2-7pm
Stewarts Hall, 15-17 Gordon St, Huntly, AB54 8AJ	Wednesday 29 May 2024 – 2-7pm
Longmore Hall, Banff Road, Keith, AB55 5ET	Thursday 30 May 2024 – 2-7pm
Fornightly Hall, Lethen Rd, Fornightly, Nairn, IV12 5JB	Tuesday 4 June 2024 – 3-7pm
Dallas Houldsworth institute (Dallas Village Hall) Dallas, Moray, IV36 2RA	Wednesday 5 June 2024 – 3-7pm
Inchberry Hall, Fochabers, IV32 7QB	Thursday 6 June 2024 – 3-7pm
Culloden Visitor Centre, Culloden Battlefield, Inverness, IV2 5EU	Tuesday 18 June 2024 – 10-1pm
Kingsmill Hotel Culcabock Rd, Inverness, IV2 3LP	Tuesday 18 June 2024 – 3-7pm
Phipps Hall, Beauly, IV4 7EH	Wednesday 19 June 2024 – 2-7pm
Kiltarlity Village Hall, Kiltarlity, IV4 7HH	Thursday 20 June 2024 – 2-7pm

⁷ www.ssen-transmission.co.uk/bbnp

3.3.4 At the entrance to each venue, project team staff were stationed to greet and record the number of attendees. Attendees were also invited to have their names and contact details recorded so that the project team could provide email updates on project information and upcoming events⁸.

3.3.5 SSEN Transmission prepared a suite of online information leaflets and collated Frequently Asked Questions (FAQs) in the SSEN Transmission Pathway to 2030 FAQ page⁹. Information leaflets were available at the events for attendees to read and take home, elaborating on the contents of the Consultation Document and Booklet. These covered topics such as:

- Applications under Section 37 of the Electricity Act 1989
- Electro Magnetic Fields
- Protecting Private Water Supplies
- Pathway to 2030: Why are these projects needed?
- Biodiversity Net Gain

Additional information leaflets were published to the SSEN Transmission Pathway to 2030 FAQ page⁹ in May 2024 and hard copies were available to members of the public during the events.

3.3.6 The printed Consultation Booklets were also available at all consultation events, and information boards and maps were available for attendees to learn more about the project at that stage of development.

3.3.7 A 3D interactive model of the alignment options depicting the OHL infrastructure was also available at the PAC 1 events. The 3D model allowed attendees to view the OHL in relation to their property or from a viewpoint they specified, to give an indication of how the infrastructure would look and to assist in their consultation feedback. Due to the model's substantial file size requirements, it was not feasible to host it on the project webpage in the same manner as it was presented in person. However, stakeholders were able to request access to the model through alternative formats, such as location specific screenshots or other visual representations, as needed. Additionally, a flythrough video of the Proposed Development was created using the 3D model and was presented at the events and made available on the project webpage

3.3.8 Members from multiple disciplines within the project team were available to answer questions and attendees were invited to provide feedback in person at the consultation events, or to a set of questions via an online feedback form or a printed consultation feedback form at the rear of the consultation booklet, see **Appendix C: Consultation Booklet PAC 1**. In addition, feedback was sought via email to a dedicated inbox (bbnp@sse.com) or by post to the Community Liaison Manager.

3.3.9 Printed copies of the Consultation Document (describing the process of OHL design development of the Potential Alignment, See **Appendix B: Consultation Document – Alignment Selection**) and Route RoC (providing feedback on the design development for the alignments progressed including describing where alternative alignments have been identified) were available at events along with hard copies of maps to take away, See **Appendix J: Routeing Stage Report on Consultation**.

3.3.10 The feedback period in relation to the PAC 1 events was open from 20 May 2024 until 2 August 2024.

Stakeholder engagement

3.3.11 Engagement with stakeholders during the pre-application consultation stage was undertaken via statutory consultee pre-application consultation meetings with Aberdeenshire Council and Scottish Forestry and via Microsoft Teams in May 2024; Moray Council, The Highland Council, and Historic Environment Scotland via Microsoft Teams in June 2024; and Scottish Water via Microsoft Teams in August 2024; we also held a number of meetings with NatureScot.

⁸ All data is managed in accordance with the General Data Protection Regulation (GDPR).

⁹ <https://www.ssen-transmission.co.uk/projects/2030-projects/2030-faqs/>

- 3.3.12 Attendees were invited to ask questions and make comments as well as submit written feedback or attend separate meetings with members of the project team if required.

Online and virtual consultation

- 3.3.13 The project website⁷ contained links to all published materials and the feedback form as well as an interactive story map, 3D Visualisations portal, project updates, responses to FAQs, and notifications of upcoming consultation events.
- 3.3.14 During the consultation and subsequent feedback period, an online exhibition room was hosted on a virtual platform designed to look and feel like a consultation in a community hall, featuring the same information boards that were presented at the in-person events. The feedback form was provided on the portal, and all visitors were invited to complete this.

Publicity

- 3.3.15 Pre-application consultation events were advertised in the Press and Journal, Banffshire Journal, Huntly Express, Banffshire Advertiser, and Banffshire Herald on the 14 and 21 May 2024, the Northern Scot and Inverness Courier on the 17 and 24 May 2024 and the Forres Gazette on the 15 and 22 May 2024.
- 3.3.16 Dates and venues of consultation events were also publicised on the project website⁷. In addition, SSEN Transmission's social media channels LinkedIn, Facebook, X (formerly twitter) and Instagram were also used to advertise the consultation events, see **Appendix E: PAC 1 Advertising and Images**.
- 3.3.17 Postcards informing of the event were also sent out to 41,018 households within proximity of the Proposed Development on the 10 and 11 May 2024, see **Appendix E: PAC 1 Advertising and Images**.
- 3.3.18 Furthermore, an email was sent to 1,088 individuals registered to receive project updates and posters were placed on community notice boards across the Proposed Development area.

Advice on making comments to the Applicant

- 3.3.19 Consultees were made aware that providing comments through the pre-application process would be to SSEN Transmission, and that an opportunity to provide formal representations to the ECU would be available once the Section 37 application was submitted and before Scottish Ministers make a decision on the application. Examples of where this has been advised can be found in the PAC 1 poster in **Appendix E: PAC 1 Advertising and Images**, and the PAC 2 Consultation Booklet in **Appendix F: Consultation Booklet PAC 2**.

Report on Consultation

- 3.3.20 The Alignment Report on Consultation (RoC) was published in January 2025 and documented the refined route and alignment selection consultation process for proposals. It outlined the number of people who attended consultation events, as well as the volume and nature of consultation responses received from members of the public, statutory and non-statutory consultees and other stakeholders. It presented summaries of feedback across common themes such as project need, environmental impacts and technology choice, and our responses to that feedback.
- 3.3.21 It also presented key decisions resulting from route and alignment specific feedback, including how alignments taken forward had been informed by this process and, where alternative options had been presented, why they were not taken forward as the Proposed Alignment. The report concluded by confirming the key decisions and any resulting adjustments made to the Potential Alignment, that were presented at consultation, confirming the Proposed Alignment to be progressed.

3.3.22 Please see **Appendix A: Alignment Report on Consultation** for the Alignment Selection RoC.

3.4 Pre-application Consultation – PAC 2

3.4.1 The purpose of the PAC 2 consultation events was to present further detail on the Proposed Development and provide feedback to stakeholders in respect of comments they provided on the proposals.

3.4.2 To support the PAC 2 consultation events, a new Consultation Booklet, was prepared and published in February 2025 and uploaded to the project website⁷. The PAC 2 Consultation Booklet provided project context and project details, summarising the feedback received from PAC 1 events, and sought final comments from stakeholders and members of the public on the Proposed Development, see **Appendix F: Consultation Booklet PAC 2**.

3.4.3 The consultation events took place at the following venues and dates / times provided in **Table 3.2**.

Table 3.2: Pre-application Consultation PAC 2 Events

Venue	Date and Time
Dallas Houldsworth Institute, Dallas, Moray, IV36 2SA	Monday 17 February 2025 – 10am–1pm
Fornightly Hall, Lethen Rd, Fornightly, Nairn, IV12 5JB	Monday 17 February 2025 - 3–7pm
Culloden Visitor Centre, Culloden Battlefield, Inverness, IV2 5EU	Tuesday 18 February 2025 -10am–1pm
Kingsmill Hotel, Culcabock Rd, Inverness, IV2 3LP	Tuesday 18 February 2025 - 3–7pm
Kiltarlity Village Hall, Kiltarlity, IV4 7HH	Wednesday 19 February 2025 - 3–7pm
Phipps Hall, Beauly, IV4 7EH	Thursday 20 February 2025 - 2:30–6:30pm
Stewarts Hall, 15-17 Gordon St, Huntly, AB54 8AJ	Monday 24 February 2025 - 3–7pm
Cairnie Memorial Hall, Cairnie, AB54 4TQ	Tuesday 25 February 2025 – 3-7pm
Baden Powell Centre, Baden Powell Road, Turriff, AB53 4FA	Wednesday 26 February 2025 - 3–7pm
Inchberry Hall, Fochabers, IV32 7QB	Thursday 27 February 2025 – 10am-1pm
Longmore Community Hall, Banff Road, Keith, AB55 5HA	Thursday 27 February 2025- 3–7pm
Maud Village Hall, Nethermuir Rd, Maud, Peterhead, AB42 4ND	Monday 3 March 2025 - 3–7pm
New Deer Public Hall, Fordyce Terrace, New Deer, Aberdeenshire, AB53 6WE	Tuesday 4 March 2025 - 1:30-5:30pm
Longside Parish Church Hall, Inn Brae, Longside, AB42 4XN	Wednesday 5 March 2025 - 3–7pm
Cuminestown Community Hall, Main St, Cuminestown, Turriff AB53 5YJ	Thursday 6 March 2025 - 10am–12pm
New Deer Public Hall, Fordyce Terrace, New Deer, Aberdeenshire, AB53 6WE	Wednesday 19 March 2025 – 6-8pm

- 3.4.4 At the entrance of each venue, project team staff were stationed to greet and record the number of attendees. Attendees were also invited to have their names and contact details recorded so that the project team could provide email updates on project updates and upcoming events¹⁰.
- 3.4.5 The printed Consultation Booklets were also available at all consultation events, and information boards and maps were available for attendees to learn more about the project at that stage of development. A revised 3D model depicting any updates following the PAC 1 events was produced and available at the events, alongside flythrough videos and a visualisation portal. Copies of the Alignment Report on Consultation were also available to view, see **Appendix A: Alignment Report on Consultation**. Members from multiple disciplines within the project team were available to answer questions and attendees were invited to provide feedback to a set of defined questions via an online feedback form or printed consultation feedback form at the rear of the consultation booklet and additionally through dedicated feedback handouts. In addition, feedback was sought via email to a dedicated inbox (bbtnp@sse.com) or by post to the Community Liaison Manager.
- 3.4.6 Information leaflets were again available on specific issues for attendees to read and take home, elaborating on the contents of the Consultation Booklet. Updates were made to the leaflets published in May 2024 (see **paragraph 3.3.5** above) and copies were available to members of the public at consultation events. Based on feedback received during PAC 1 consultations, a number of additional leaflets were created, namely:
- What to expect during the delivery of our projects;
 - HVDC vs HVAC;
 - Delivering a positive environmental legacy; and
 - Early Careers.
- 3.4.7 Printed copies of the Alignment RoC (describing the process of OHL development and the consultation responses received as part of our Alignment Selection consultation and shows how the Proposed Alignment being taken forward to the next stage has been informed by this process) were available at events along with hard copies of maps to take away, See **Appendix A: Alignment Report on Consultation**.
- 3.4.8 As mentioned above, the main purpose of the PAC 2 events was to present feedback on views obtained in response to the earlier round of consultation and provide the opportunity to receive further feedback. The consultation period allowing for additional feedback was open from 3 February until 21 March 2025. In addition, local Community Councils were welcomed to contact with us if they wished to discuss the RoC or any other matters ahead of the PAC 2 events. No formal responses were received from local Community Councils.

Stakeholder engagement

- 3.4.9 Further engagement with stakeholders during the PAC 2 pre-application consultation stage was undertaken via statutory consultee meetings. These included meetings with the ECU and SEPA in January 2025 and a site visit with NatureScot in April 2025.

Online and virtual consultation

- 3.4.10 The project website⁷ contained links to all published materials and the feedback form as well as project updates, links to the 3D visualisation portal which displayed the Proposed Development route alongside location specific snapshots of 3D visualisations of the Proposed Development, responses to FAQs, and notifications of upcoming consultation events.

¹⁰ All data is managed in accordance with the General Data Protection Regulation (GDPR).

Publicity

- 3.4.11 Pre-application consultation events were advertised in the Press and Journal on 7 and 17 February 2025; the Inverness Courier on 7 and 14 February 2025; The Northern Scot on 7 February 2025; the Forres Gazette on 5 and 12 February 2025; The Banffshire Journal and the Huntly Express on 11 and 18 February 2025.
- 3.4.12 Dates and venues of consultation events were also publicised on the project website⁷. In addition, SSEN Transmission's social media channels LinkedIn, X (formerly twitter), Facebook and Instagram were also used to advertise the consultation events, See **Appendix H: PAC 2 Advertising and Images**.
- 3.4.13 A letter informing of the event was also sent out to 25,254 households within proximity of the Alignment Development in January 2025, See **Appendix H: PAC 2 Advertising and Images**.
- 3.4.14 Furthermore, an email was sent to 1,088 individuals registered to receive project updates.

Advice on making comments to the Applicant

- 3.4.15 Consultees were made aware that making a comment through the pre-application process would be to SSEN Transmission, and that an opportunity to provide formal representations to the ECU would be available once the Section 37 application was submitted and before the Scottish Ministers make a decision on the application. Examples of where this has been advised can be found in the PAC 2 advertisements in **Appendix H: PAC 2 Advertising and Images**, and the PAC 2 booklet in **Appendix F: Consultation Booklet PAC 2**.

3.5 Pre-application Consultation – Coachford Proposed Alignment Design Changes

- 3.5.1 The purpose of the additional consultation events, held in Keith and Cairnie, was to present design changes to the Proposed Development following the removal of the proposed Coachford Substation from the project scope, which affected a short section of the OHL in this specific area. The decision to remove Coachford Substation was taken following the results of detailed ground investigations which revealed technical challenges with the proposed site.
- 3.5.2 The following design changes were presented at the events. The removal of the proposed Coachford Substation. The removal of the proposed diversion of the existing Blackhillock to Rothienorman 400 kV OHL. The introduction of a 'diamond crossing' southeast of Keith to allow the Proposed OHL Alignment to cross over the existing Blackhillock to Rothienorman 400 kV OHL. The change to the Proposed OHL Alignment southeast of Keith following the removal of the proposed diversion of the existing Blackhillock to Rothienorman 400 kV OHL. An additional two towers at the Coachford Substation site itself to allow the Proposed OHL Alignment to pass straight through the site. The addition of transposition towers at two locations along the Proposed OHL Alignment due to line length.
- 3.5.3 To support the consultation events, a new Consultation Booklet, was prepared and published in June 2025 and uploaded to the project website⁷. The Consultation Booklet provided project context and details and sought comments from stakeholders and members of the public on the Proposed Development changes.
- 3.5.4 The consultation events took place at the following venues and dates / times provided in **Table 3.3**.

Table 3.3: Pre-application Consultation Coachford Proposed Alignment Design Changes Events

Venue	Date and Time
Cairnie Memorial Hall, Cairnie, AB54 4TQ	Tuesday 24 June 2025 – 3-7pm
Longmore Community Hall, Banff Road, Keith, AB55 5HA	Thursday 26 June 2025 – 3-7pm

- 3.5.5 At the entrance of each venue, project team staff were stationed to greet and record the number of attendees. Attendees were also invited to have their names and contact details recorded so that the project team could provide email updates on project updates and upcoming events¹¹.
- 3.5.6 The printed Consultation Booklets were also available at all consultation events, and information boards and maps were available for attendees to learn more about the project at that stage of development. A revised 3D model depicting the Proposed Development updates, following the removal of the previously proposed Coachford Substation, was produced and available at the events, alongside a flythrough video and a visualisation portal. Copies of the Alignment RoC were again available to view, see **Appendix A: Alignment Report on Consultation**.
- 3.5.7 Members from multiple disciplines within the project team, as well as project team members from the previously proposed Coachford Substation, were available to answer questions and attendees were invited to provide feedback to a set of defined questions via an online feedback form or printed consultation feedback form at the rear of the consultation booklet. In addition, feedback was sought via email to a dedicated inbox (bbnp@sse.com) or by post to the Community Liaison Manager.
- 3.5.8 The updated information leaflets from the PAC 2 events (see **paragraph 3.4.6** above) were again available on specific issues for attendees to read and take home, elaborating on the contents of the Consultation Booklet.
- 3.5.9 As mentioned above, the main purpose of the additional pre-application events was to present the design changes to the Proposed Development, providing information on Alignment Selection outcomes and considerations, and to provide the opportunity to receive further feedback. The consultation period allowing for additional feedback was open from 10 June until 18 July 2025. In addition, local Community Councils were welcomed to contact with us if they wished to discuss the changes or any other matters ahead of the additional events. No formal responses were received from local Community Councils.

Stakeholder engagement

- 3.5.10 Statutory consultees were contacted on 20 June 2025 to share the consultation materials and offer meetings if they had any queries.

Online and virtual consultation

- 3.5.11 The project website⁷ contained links to all published materials and the feedback form as well as project updates, links to the 3D visualisation portal, responses to FAQs, and notifications of upcoming consultation events.

Publicity

- 3.5.12 Pre-application consultation events were advertised in the Press and Journal on 12 June 2025 and The Banffshire on 10 June 2025.
- 3.5.13 Dates and venues of consultation events were also publicised on the project website⁷. In addition, SSEN Transmission's social media channels LinkedIn, X (formally twitter), Facebook and Instagram were also used to advertise the consultation events, See **Appendix K: Coachford Proposed Alignment Design Changes Event Advertising and Images**.

¹¹ All data is managed in accordance with the General Data Protection Regulation (GDPR).

- 3.5.14 A letter with the updated project information and details of the event was also sent out to 4020 households within proximity of the Alignment Development changes in June 2025, See **Appendix K: Coachford Proposed Alignment Design Changes Event Advertising and Images**.
- 3.5.15 Furthermore, an email was sent to 185 individuals registered to receive project updates.

Advice on making comments to the Applicant

- 3.5.16 Consultees were made aware that providing comments through the pre-application process would be to SSEN Transmission, and that an opportunity to provide formal representations to the ECU would be available once the Section 37 application was submitted and before Scottish Ministers make a decision on the application. Examples of where this has been advised can be found in the Coachford advertisements in **Appendix K: Coachford Alignment Amendments Event Advertising and Images**, and the event booklet in **Appendix L: Coachford Proposed Alignment Changes Booklet**.

4. PRE-APPLICATION CONSULTATION PAC 1 RESPONSES, KEY ISSUES AND HOW THE PROJECT RESPONDED

4.1 Overview

- 4.1.1 This section summarises the pre-application consultation PAC 1 responses, and how the project responded to them.
- 4.1.2 **Table 4.1** details the consultation events held at various locations and shows the number of attendees at each event. In total there were 1,000 attendees across all the events. A total of 297 responses were received from the public consultations. A total of 21 responses were received from statutory and non-statutory consultees. These were received either via the feedback form or as written responses submitted to the project email inbox or by post.

Table 4.1: PAC 1 Consultation Event Details and Number of Attendees

Venue	Date	Number of attendees
Maud	20 May 2024	92
Cuminestown	21 May 2024	84
Longside	22 May 2024	187
New Deer	23 May 2024	101
Turriff	27 May 2024	108
Cairnie	28 May 2024	58
Huntly	29 May 2024	31
Longmore	30 May 2024	67
Fornightly	4 June 2024	15
Dallas	5 June 2024	15
Inchberry	6 June 2024	30
Culloden	18 June 2024	35
Inverness	18 June 2024	31
Beauly	19 June 2024	77
Kiltarlity	20 June 2024	69

4.2 Pre-application Consultation PAC 1 Responses

- 4.2.1 A summary of the feedback received from all stakeholders (statutory and non-statutory consultees, the local community and members of the public) in response to the PAC 1 consultations during the consultation period

which ran from 20 May until 2 August 2024, were documented in the Alignment Selection Report on Consultation, published in January 2025 and can be viewed in **Appendix A: Alignment Report on Consultation**.

5. PRE-APPLICATION CONSULTATION PAC 2 RESPONSES, KEY ISSUES AND HOW THE PROJECT RESPONDED

5.1 Overview

5.1.1 This section summarises the pre application consultation PAC 2 responses, and how the project responded to them.

5.1.2 **Table 5.1** sets out the consultation events and shows the number of attendees at each event. In total there were 884 attendees across all the events. Attendance figures reflect the number of people who registered their attendance at the consultation events on the day. For busier events, the number of attendees was often considerably higher than recorded.

Table 5.1: PAC 2 Consultation Event Details and Number of Attendees

Venue	Date	Number of attendees
Dallas	17 February 2025	22
Fornightly	17 February 2025	32
Culloden	18 February 2025	57
Inverness	18 February 2025	53
Kiltarlity	19 February 2025	68
Beaully	20 February 2025	84
Huntly	24 February 2025	59
Cairnie	25 February 2025	29
Turriff	26 February 2025	69
Inchberry	27 February 2025	32
Longmore	27 February 2025	70
Maud	3 March 2025	57
New Deer	4 March 2025	58
Longside	5 March 2025	120
Cuminestown	6 March 2025	45
New Deer	19 March 2025	29

5.2 Pre-application Consultation PAC 2 Responses

5.2.1 A summary of the feedback received from statutory and non-statutory consultees, the local community and general public following the consultation period which ran from 3 February to 21 March 2025, alongside SSEN

Transmission responses, is set out below in **Table 5.2**. Additional information regarding the key themes was published to the SSEN Transmission Pathway to 2030 FAQ page ¹².

Table 5.2: PAC 2 Themes and Responses

Theme	Response
Consultation Process and Communication Stakeholders express dissatisfaction with the consultation process, criticising it for lack of transparency, insufficient communication, and perceived disregard for community input. They request more open discussions, evidence of consideration for community feedback, and detailed information on project proposals and environmental assessments.	We held a number of public consultation events, public meetings and group engagements, using a range of methods to promote our consultations to our stakeholders. Throughout the consultation process we have listened closely to identify areas of concern relevant to the Proposed Development's design, allowing us to consider our next steps prior to refining proposals. This has involved amending our proposals and considering and investigating alternative routes or sites in some areas which is presented in both our Routeing Stage RoC, See Appendix J: Routeing Stage Report on Consultation, and our Alignment Selection RoC, See Appendix A: Alignment Report on Consultation. We recognise there is always room for improvement in the way we consult local communities, and we will continue to welcome feedback on how we can further improve how we consult with our stakeholders.
Impact on Property Value and Compensation Stakeholders are concerned about the visual impact of pylons on the landscape and the potential devaluation of properties. There is a strong preference for alternative solutions such as burying cables or rerouteing to minimize visual intrusion and protect property values.	We understand that there are concerns about the potential impact on properties and businesses within the vicinity of our proposed OHL. We have sought to work closely with communities and engage with property owners and seek to mitigate impacts. As a regulated business, we are obliged to follow a statutory legal framework under the Electricity Act 1989 and Land Compensation (Scotland) Act 1963. If you are entitled to compensation under the legal framework we will assess any claim on a case-by-case basis under the direction of this legal framework. If this is the case, we will recommend that you engage a professional adviser and we generally meet reasonably incurred professional fees in these circumstances.
Cumulative Impact Communities highlighted the potential impact of further renewable developments in the areas because of the network upgrades. The concerns about the cumulative impact of both	The EIA Report will include an assessment of cumulative effects for each topic included within the report. This will include the effects of the Proposed Development in combination with other SSEN Transmission developments and those by other developers so that

¹² <https://www.ssen-transmission.co.uk/projects/2030-projects/2030-faqs/>

Theme	Response
construction and operation as well as the visual impact of infrastructure was also included in feedback.	the full impact of development in the area can be understood. Developer Forums have been established for the Greens and New Deer and Peterhead area, open to developers and asset owners with projects proposed to connect within these areas. The aim of these forums is to understand each other's plans, share information and ultimately reduce disruption to the local community and other affected stakeholders.
Underground and Subsea Cabling Many stakeholders advocate for underground or subsea cabling instead of overhead pylons, due to concerns about environmental impact, visual pollution, and community disruption.	The environmental, technical, and operational constraints associated with underground cabling at 400 kV make this option extremely challenging to deliver in many areas of Scotland. Even if technically feasible, underground cables over a significant length, or the entirety, of a project would be unreasonable as it would be contrary to our license obligations to be economical and efficient in respect of additional costs to the end consumer, while presenting an additional risk to the electricity transmission network in the event of cable failure and consequent outages. Given these constraints and our responsibility for an economical and efficient transmission network, OHLs are our main choice for the Beauly – Blackhillock – New Deer - Peterhead 400kV proposed development. Due to the significant volume of power, we need to connect and transport from generation source to areas of demand, the National Energy System Operator (formerly National Grid ESO) concluded that there is a need for both onshore and offshore network reinforcements within the Holistic Network Design (HND). OHL's can carry roughly three times more power than subsea cables, making them more efficient and cost effective for energy bill payers. Technical challenges and constraints limit the use of subsea cables as a single solution. Moreover, onshore reinforcements help support local electricity needs and improve the network's reliability across northern Scotland. Further information regarding the challenges with undergrounding 400 kV assets has been provided on the SSEN Transmission Pathway to 2030 FAQ page¹³.

¹³ <https://www.ssen-transmission.co.uk/globalassets/projects/2030-projects/2030-project-documents/the-challenges-with-undergrounding-at-400kv.pdf>

Theme	Response
Electric and Magnetic Fields Health concerns, particularly in relation to Electric and Magnetic Fields (EMF) were another common theme received in feedback.	We develop, build, and operate our infrastructure to meet all health and safety legislation and guidance set by relevant bodies including the UK Government, Scottish Government, the Health and Safety Executive (HSE) and our regulator, Ofgem – including that associated with EMF. In respect of EMFs, we strictly follow the guidance as set by the UK Government, which in turn is informed by international guidance. As well as setting exposure limits that protect against known established effects of EMF, the UK Government's guidance also includes precautionary measures to protect against possible effects below the exposure limits that have not been established by science. In addition to this, the UK Health Security Agency and Department of Health have a remit to review new research in this area and ensure that current guidelines and policies are reflective of that research. Further information regarding EMF has been provided on the SSEN Transmission Pathway to 2030 FAQ page¹⁴.
Ground Investigation Works Stakeholders raised concerns regarding Ground Investigation (GI) Works being undertaken ahead of project consent being granted.	Ahead of the submission of our Section 37 consent application for our proposed Beaulieu – Blackhillock – New Deer - Peterhead 400kV overhead line project, we have been carrying out Ground Investigation (GI) Works at some of the proposed tower locations. This work is a necessary step in any new development and the results will help establish the final tower foundation design. This typically involves drilling boreholes and/or digging trial pits, allowing engineers to understand the engineering properties of the soil and rock beneath potential tower locations and their ability to support the structures. The GI Works are carried out using Permitted Development rights available to SSEN Transmission under Class 40, (1), (c) of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (as amended), being necessary survey works. Our contractors will work to keep local disturbance to a minimum throughout the duration of these works.
Impact on Landscape and Natural Beauty	As one of the greatest risks to our natural environment and biodiversity is climate change, these projects are

¹⁴ <https://www.ssen-transmission.co.uk/globalassets/projects/2030-projects/2030-project-documents/emf.pdf>

Theme	Response
Stakeholders raised concerns about potential environmental impacts, particularly on local biodiversity and ancient woodland.	part of the solution if we are to tackle the climate emergency and deliver net zero emissions in Scotland and across the United Kingdom. However, we do recognise that in delivering these critical projects, there will be unavoidable impacts, and we would like to reassure stakeholders that we take our environmental responsibilities extremely seriously. To deliver our projects in the most sensitive way possible we ensure environmental factors are considered at every stage in the development of each project, along with technical requirements and economic considerations. We follow the mitigation hierarchy by firstly seeking to avoid sensitive areas wherever possible and secondly, where impacts are likely to occur, we seek to minimise these, provide mitigation and identify opportunities to restore. In addition, all of our consent applications will be accompanied by detailed environmental impact assessments which are prepared by external specialists. These assessments will consider impacts on a wide range of environmental topics (many of which have been highlighted in the stakeholder responses to this consultation) and identify measures that may be required to mitigate any impacts. Potential impacts during construction and operation will be assessed in detail as part of the Environmental Impact Assessment (EIA) Report stage. Construction impacts on the environment will be managed through the application of a Construction Environmental Management Plan (CEMP), which will be prepared and implemented by the Principal Contractor once consent has been granted for the Proposed Development. The CEMP will detail how the Principal Contractor will manage construction in accordance with commitments and mitigation detailed in the EIA Report, statutory consents and authorisations, and industry best practice and guidance. Implementation of the CEMP will be managed on-site by a suitably qualified and experience Environmental Clerk of Works (EnvCoW), with support from other environmental professionals as required. We also acknowledge that minimising impacts is not enough on its own, and we have therefore committed to delivering a Biodiversity Net Gain (BNG) on all our projects; as well as compensatory planting for any trees felled during the construction phase, where possible with native species. Where our projects are unable to completely avoid irreplaceable habitats (for example

Theme	Response
	peatland or ancient woodland), we have also introduced a commitment to restore more habitat than we affect.

6. COACHFORD PROPOSED ALIGNMENT DESIGN CHANGES RESPONSES, KEY ISSUES AND HOW THE PROJECT RESPONDED

6.1 Overview

6.1.1 This section summarises the responses from the events held to present the Proposed Alignment design changes, and how the project responded to them.

6.1.2 **Table 6.1** details the consultation events held and shows the number of attendees at each event. In total there were 111 attendees across all of the events. A total of three responses were received from statutory and non-statutory consultees. A total of 14 responses were received from the public consultations. These were received either via the feedback form or as written responses submitted to the project email inbox or by post.

Table 6.1: Coachford Proposed Alignment Design Changes Consultation Event Details and Number of Attendees

Venue	Date	Number of attendees
Cairnie	24 June 2025	47
Keith	26 June 2025	64

6.2 Pre-application Consultation – Alignment Design Changes Responses

6.2.1 In summary, feedback received from the events, and the responses given, included similar themes to the PAC 2 events, with questions around technology choice, property value impact and compensation, and health concerns, specifically around EMFs.

6.2.2 Statutory consultees, SEPA, NatureScot, and HES, all responded via email and confirmed they had no concerns with the proposed changes. No other responses were received from statutory consultees.

7. CONCLUSIONS

- 7.1.1 This PAC Report documents the consultation undertaken with statutory and non-statutory consultees as well as the public across the two consultation event stages (PAC 1 and PAC 2) of the Beaully to Blackhillock to New Deer to Peterhead 400 kV OHL Project, now submitted to the Scottish Government Energy Consents Unit as part of an application under Section 37 of the Electricity Act 1989.
- 7.1.2 Pre-application consultation was planned with reference to the expectations described in the Scottish Government's Good Practice Guidance.
- 7.1.3 A total of 15 PAC 1 consultations were carried out in May and June 2024. These were supported by an online consultation platform, following extensive publicity in local press, social media, direct email communications, mailouts, and the project website⁷. A feedback period was then open for eight weeks, following which, feedback was collated and analysed and a RoC issued in January 2025.
- 7.1.4 The PAC 2 consultation events, were held throughout February and March 2025. A feedback period of six weeks was open following PAC 2 consultations, to capture any additional feedback.
- 7.1.5 A total of 2 further consultation events were then held in Keith and Cairnie in June 2025, following the removal of the proposed Blackhillock 2 (Coachford) substation from the wider project scope, to present the subsequent Proposed Alignment design changes. A feedback period of 5 weeks was open following the consultations (9 June until 18 July). Feedback for this was smaller in volume given the catchment area and the themes were similar to the PAC 2 events.
- 7.1.6 Throughout our engagement, the Proposed Development was revised where possible to reflect feedback received during the consultation process. These updates were informed by further survey work, ensuring that the proposal represents a balanced consideration of stakeholder views, technical requirements, and practical limitations.
- 7.1.7 Information in respect of all events was published by the project team and made available at the events themselves and online via the project website⁷, including consultation booklets, consultation document, information banners, large format plans and maps, 3D visualisations were available at in-person events and outside these sessions on request, and information leaflets on various topics.
- 7.1.8 The consultation was designed to facilitate engagement with the local community, community councils, statutory authorities and Elected Members to invite feedback on the proposals, and latterly to provide summaries of feedback with a response from SSEN Transmission.
- 7.1.9 The approach to public consultation has ensured that stakeholders and consultees have been given the opportunity to comment on the proposals and understand how feedback has been considered. This has enabled locally important issues and concerns to be identified and subsequently considered in the preparation of the Section 37 application.