Scottish & Southern Electricity Networks
TRANSMISSION

Beauly to Blackhillock to New Deer to Peterhead 400 kV Project

Environmental Impact Assessment Report

Volume 5 | Technical Appendices

Appendix 6.2 – Scoping Opinion

Scottish Government
Riaghaltas na h-Alba
gov.scot

ANNEX A Consultation responses ***ANNEX B MD-SEDD Standing Advice.***

[redacted]

Aberdeen International Airport

Aberdeen International Airport Limited
Dyce, Aberdeen
AB21 7DU
Scotland

T: +44 (0)870 040 0006
W: aberdeenairport.com

FAO [redacted]
Local Energy and Consents
Scottish Government

Via Email

ABZ Ref: ABZ3266

25th July 2024

Dear [redacted]

Ref: REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR BEAULY TO BLACKHILLOCK TO NEW DEER TO PETERHEAD 400KV OHL

I refer to your request for scoping opinion received in this office on 8th July 2024.

The scoping report submitted has been examined from an aerodrome safeguarding perspective and we would make the following observations:

- The proposed route is located outwith obstacle limitation surfaces for Aberdeen Airport;
- The proposed route is within the instrument flight procedure (IFP) safeguarding area for Aberdeen Airport. We note that while towers will average 57m in height this may increase where local topography dictates. Should any tower exceed 90m above ground level between Turrif and Peterhead this may impact IFPs and detailed assessments would be required.

Our position with regard to this proposal will only be confirmed once the proposal details are finalized and we have been consulted on a full planning application. At that time we will carry out a full safeguarding assessment and will consider our position in light of, inter alia, operation impact and cumulative effects.

Yours Sincerely
Redacted

[redacted]

Safeguarding Manager
Aberdeen Airport
07808 115 881
abzsafeguard@aiairport.com

Aberdeenshire COUNCIL

[redacted]

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Aberdeenshire
COUNCIL

Redacted

[redacted]

Patron His Majesty The King

Bringing horses and people together

The British Horse Society Scotland
Suite A3
Stirling Agricultural Centre
Stirling FK9 4RN

Email catriona.davies@bhs.org.uk
Website www.bhs.org.uk
Tel 02476 840749
Mob 07757 258712

By email to: [redacted]

29th July 2024

Dear Sir/Madam,

Re: Beauly to Blackhillock to New Deer to Peterhead 400kV OHL - ECU00005165

Thank you for the opportunity to respond to this request for scoping opinion. The British Horse Society (The BHS) represents the interests of the 3.4 million people in the UK who ride or who drive horse-drawn vehicles and is the largest and most influential equestrian charity in the UK. The BHS is committed to protecting and promoting the interests of all horses and the people who care for them through our work in education, welfare, safety and access.

Outdoor Access
Access to safe off-road riding routes is vital to the health and wellbeing of horses and their riders. Under the terms of the Land Reform (Scotland) Act 2003, equestrians have the same rights of access to the outdoors as other non-motorised users, such as pedestrians and cyclists. Equestrian use should therefore be included when planning and designing wind farm proposals. Considering all access takers, including equestrians, in the early stages helps to avoid problems down the line and ensures that projects like this are an opportunity to preserve and improve access for all, rather than curtail it or restrict it to certain groups.

Whilst designated routes such as core paths, rights of way and promoted routes are important, due to their specific access requirements equestrians also rely heavily on the wider path network, informal paths and field boundaries. The applicant should therefore also consider how to manage public access, beyond designated routes, in the vicinity of this extensive site.

The BHS is here to help and can provide guidance on suitable surfaces and infrastructure to accommodate equestrians and other access takers. We would be very willing to work with the applicant on these aspects.

The Importance of Off-Road Riding
Access to safe off-road riding routes is vital to the health and wellbeing of horses and their riders. Equestrian road users are classed as vulnerable as they are more likely to be involved in a road accident and more likely to suffer the worst consequences.

Most riding accidents happen on minor roads and with increasing numbers of horses and riders seeking to access the countryside, adequate access to off-road riding should be a priority, especially in rural and semi-rural areas, and areas of high horse ownership, as parts of Aberdeenshire, Highland and Moray are. Few riders access busy roads by choice (although the horse has as much right to be on public roads as cars, bikes and pedestrians) - but they often have few other places to ride or no other way to access their safe off-road riding.

Vehicles travelling two and from work sites are likely to meet equestrians on the road and drivers should be advised of this risk. I have enclosed a copy of our *"Guidance to drivers of large vehicles"* document.

The British Horse Society is an Appointed Representative of South Essex Insurance Brokers Limited
who are authorised and regulated by the Financial Conduct Authority.

Registered Charity Nos. 210504 and SC038516. A company limited by guarantee. Registered in England & Wales No. 444742

Horse care and welfare
Horse owners need access to attend to their horses at least twice a day and more often if they are managing an injury or other health issue. In addition, in an emergency, a horse owner and/or a vet may need vehicular access at any time and at very short notice.

Horses may be kept;

In the immediate vicinity of their owner's residence,
At a livery yard or stables, along with a number of other horses,
On small pieces of land, not associated with a residential property or stable yard.

The applicant needs to consider what steps they will take to ensure the safety and welfare of horses kept within the vicinity of the site and that their owners have access to care for them during both construction and operation.

The Horse and the Rural Economy
Scotland's equestrian industry is worth over £300 million to the Scottish economy annually. This figure excludes the value of the horse racing industry, which is worth a further £300 million. Moray and Aberdeenshire in particular area areas of high horse ownership, so equestrianism is an important part of the rural economy. Recent joint research between SRUC and The BHS showed current trends in the sector point to a continued increase in horse numbers and riding activity in all geographical areas of Scotland and across a wide cross section of society, leading to growth in the sector.

A national survey of riders who had recently given up their horse found that 27% of them had done so because they had lost access and had nowhere to ride. Failing to accommodate horses on our local path networks may lead to riders being forced to give up their horses, which in turn may damage the local economy.

I trust that the above information is of assistance. If you have any questions or would like to discuss the needs of equestrians further, please do contact me.

Kind regards,

Redacted

[redacted]
Scotland Access Officer
The British Horse Society

From: radio.licensing@bt.com
Sent: 12 September 2024 09:34
To: [redacted]
Cc:
Subject: RE: WID13438 Beauly to Peterhead 400kV Overhead Line Alignment Consultation - ECU00005165

OUR REF: WID13438

Thanks for your patience and cooperation regarding this proposal.

We have carried out an analysis using the various factors on existing radio links. These mainly include path profile, current technology and Fresnel zone calculation. The analysis performed has confirmed that, as an exception, we can approve the currently rejected towers in their proposed position.

WID13438T541 is 7.5 metres away from the link path however there enough clearance not to affect the existing radio links as they stand.

WID13438T70 & WID13438T71 fall short of 100 metres however, as you are stretching the tower separation to 380 metres this supports our mitigation efforts to avoid affecting the radio links as they stand. The height of the towers are 57.57 and 60.57 metres and closest is 78.26 metres away to our active link. The second Fresnel zone is 12.49 metres away from the links path, adding the minimum required 25 metre buffer is 37.49 metres. This concludes we can accept these structures.

BT require 100 metres from any active/planned link path and the acceptance of this proposal cannot be assumed for any further proposals.

For any proposal there are various factors considered regarding the active/planned radio link(s) in question.

If there are any changes to the proposed tower locations and heights. Please confirm and we will happily reassess for you.

Kind Regards

[redacted]
National Radio Planner
Network Planning

From: [redacted]
Sent: 15 July 2024 14:54
To: [redacted]
Cc: Planning
Subject: RE: Request for Scoping Opinion - Beauly to Blackhillock to New Deer to Peterhead 400kV OHL - ECU00005165

Good afternoon [redacted],

Thank you for consulting CNPA on the scoping opinion on the above-mentioned development. Given the distance from the National Park boundary, the Park Authority has no comments to make,

Kind regards

[redacted]

[redacted]
Planning Manager (Development Management)

T: 01479 870 564
E: [redacted]

Usual working hours: Monday to Thursday

Cairngorms National Park Authority /
Ùghdarras Pàirc Nàiseanta a' Mhonaidh Ruaidh
14 The Square | Grantown on Spey | PH26 3HG
+44 (0) 1479 873 535 | cairngorms.co.uk

Read our plan for the future: cairngorms.co.uk/PartnershipPlan

The Highland Council
Comhairle na Gàidhealtachd

Consultation Response for

Historic Environment Team (Archaeology)

Application Name	400kV OHL between Beauly and Peterhead with associated works
Planning Reference	24/03064/SCOP
Date of Response	22/08/2024

The Scoping Report notes that it is not likely that significant direct impacts to non-designated assets can be avoided completely. In section 9.3.2 it states that significant effects on non-designated heritage assets are expected (and that cannot be avoided). These should be made clear within an impact assessment alongside a mitigation strategy for managing the impacts. This conflicts with the statement in 9.6.2 that embedded mitigation means the avoidance of all direct impacts and concludes that this can be Scoped Out. It is considered that **direct impacts should be Scoped In**.

It is accepted that micrositing can be expected in order to avoid direct impacts to known sites. However, there must be evidence of the cultural heritage baseline and of how exactly how impacts are proposed to be avoided. It is therefore not accepted that this element can be Scoped Out.

Further work is considered necessary to identify the Cultural Heritage baseline. Section 9.4 states that further assessment will continue through the alignment and EIA stages to allow a mitigation strategy to minimise impacts to be proposed. It is also noted that HER data has yet to be reviewed and that this may hold details of additional sites that have yet to be considered. In general, the baseline should be identified by walkover survey of the route so that both upstanding remains and the potential for buried features or deposits to be present can be recorded within the assessment. Any additional lidar data commissioned as part of this project should also be scrutinised to assess the potential for previously unrecorded heritage assets. Where impacts are unavoidable, HET expect methods to mitigate this impact to be discussed in detail.

Section 9.2.2 notes that the study area will be limited to 1km outwith the Proposed Route due to initial assessments and responses from consultees. However, these assessments and responses are not clear and the response from HES to the pre-planning application appears to conflict with this in regard to the potential impacts on designated sites that lie beyond the 1km limit. It would be useful to see evidence of this so that a judgement can be made on the impacts on sites that lie outwith the 1km limit; this would best be presented as part of an impact assessment. Contrary to the proposal presented in section9.6.1, it is also recommended that **indirect impacts on designated assets are Scoped In**. Professional judgment must be used for this rather than applying a standard 1km survey area from the route corridor to allow the inclusion of all potential impacts to be assessed.

Please let me know if you need anything further at this stage.

Name	[redacted], Archaeologist		
Email	[redacted]	Phone	01463 702504

From: [redacted] (Environment - Dev & Active Travel) <[redacted]>
Sent: 04 September 2024 15:00
To: [redacted] (Planning (South))
Cc: [redacted]
Subject: RE: 24/03064/SCOP - Request for Scoping Opinion - Beauly to Blackhillock to New Deer to Peterhead 400kV OHL - ECU00005165

Hi [redacted]

Please find following our comments. Apologies for the delay. I've also uploaded the comments to the portal.

I have not had a chance to visit the route of the grid connection since being consulted but have compared the proposals against our scaled aerial photography, the Native Woodland Survey of Scotland and the Ancient Woodland Inventory.

The applicant has provided Figure 2 – Proposed Route with Environmental Constraints, a suite of 12 drawings, the first four of which relate to Highland. These drawings show the proposed route along with some environmental constraints, but not the Ancient Woodland Inventory.

The route passes through open land, plantation forestry and some areas of native woodland. A significant amount of the plantation woodland is recorded as Long-established plantation origin (LEPO1860) while smaller areas of native woodland are recorded as Ancient semi-natural origin (ASNO1860 and ASNO1750). There are also a number of woodlands within the corridor which are recorded in the Native Woodland Survey of Scotland.

The applicant has included in the Scoping Report a Forestry Chapter which includes text description of some of the larger named Woods. There is also acknowledgement of the presence of woodland listed in the AWI and the NWSS.

NPF4 Policy 6 b) notes that Development proposals will not be supported where they will result in: i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition; ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value; iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy.

NPF4 Policy 6 c) notes that Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered.

As previously noted, the applicant has provided a Scoping Report with a Forestry Chapter (11) which includes outline comment on baseline conditions, potential effects of proposed development and mitigation. There is also a section on proposed scope and methodology of assessment where it is suggested that the forestry assessment will focus on commercial forestry. This could be accepted as long as the native woodland assessment is contained elsewhere in the ES.

The Terrestrial Ecology chapter (7) refers to woodland habitats and also refers to woodland listed in the AWI. The assessment of native woodland habitats could be accepted in the Terrestrial Ecology chapter.

The scoping proposals set out in the Forestry Chapter of the scoping Report are broadly accepted, but for the avoidance of doubt, we would recommend the following: -

The applicant will need to provide an ES which includes a baseline survey of all the woodlands, trees and plants (including fungi, lichens and bryophytes) present on the site to determine the presence of any rare or threatened species. This could be a specific Forestry Chapter by a professional forester which identifies the location, area, type and condition of all productive woodland on and around the route along with a Terrestrial Ecology chapter which identifies the location, area, type and condition of all native woodland.

The applicant will also need to provide a breakdown of the impact of the proposals on woodland by type (productive, native or both), as well as making clear the likely impact on woodland listed in the AWI under the various categories and also provide confirmation of the impact on native woodland listed in the NWSS.

The applicant should design the layout to minimise the impact on woodland as much as possible, especially native broadleaf woodland and woodland listed on the AWI as ASNO. The ES should include Tree Constraints Plans and Tree Protection Plans to BS 5837:2012 to show how retained trees/ woodland would be safeguarded from construction activity as well as a tree/ woodland removal drawing which shows the extent of woodland that would need to be removed to accommodate new development.

The applicant will also need to provide a Landscape Plan and Landscape Maintenance Plan which shows how trees to be removed are to be replaced with on-site planting and to show how the visual amenity of the local landscape is to be enriched.

Where woodland is proposed to be removed, compliance with the Scottish Government's Control of Woodland Removal policy must be demonstrated. Where there are any proposals for woodland removal, compensatory planting of an area of new woodland, of a scale and type of woodland equivalent to that which is to be removed is a clear expectation. With this application, any compensatory planting is likely to be off-site.

From: Safeguarding <Safeguarding@hial.co.uk>
Sent: 20 July 2024 13:38
To: [redacted]
Subject: RE: Request for Scoping Opinion - Beauly to Blackhillock to New Deer to Peterhead 400kV OHL - ECU00005165

OFFICIAL

Your reference: ECU00005165
Our reference: 2024/188/INV

Proposal: REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR BEAULY TO BLACKHILLOCK TO NEW DEER TO PETERHEAD 400KV OHL

Location: OHL between Beauly, Blackhillock, New Deer and Peterhead, approximately 194km in length

Dear Sir/Madam,

Highlands and Islands Airports Limited has been consulted on the above proposed development, received by this office on 8 July 2024.

Whist appreciating that the development parameters will be refined and confirmed through the EIA process, unfortunately, there is currently insufficient information to carry out assessment.

Therefore, Highlands and Islands Airports Limited would submit a holding objection and reserve the right to object.

Regards,

Safeguarding Team
Highlands and Islands Airports Limited
safeguarding@hial.co.uk

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

By email: Econsents_Admin@gov.scot

[redacted]
Case Officer
Energy Consents Unit

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300060097
Your ref: ECU00005165
15 August 2024

Dear [redacted]

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Beauly to Blackhillock to New Deer to Peterhead 400kV OHL

Environmental Impact Assessment scoping consultation

Thank you for you consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 09 July 2024 We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include topics covered by our advice-giving role, and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas.

Proposed development

We understand that the proposed development comprises the construction of a new 400KV overhead line c. 194km in length, realignment and /undergrounding of existing electricity infrastructure, reinforcement of roads and creation of new access tracks mentioned. We understand that the associated proposed new sub-stations will be scoped separately.

Scope of assessment

We recommend that the applicant should refer to the EIA Handbook for best practice advice on assessing cultural heritage impacts. The Environmental Impact Assessment should include a full assessment of impacts on the historic environment by an appropriately experienced historic environment professional. We have provided more detailed comments on the scoping report in the annex to this letter.

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

[redacted]

Further information

[redacted]

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

ANNEX

[redacted]

The Scoping Report

[redacted]

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

Our Advice

[redacted]

[redacted]

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

[redacted]

Our interest

[redacted]

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

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[redacted]

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

[redacted]

[redacted]

From: JRC Windfarm Coordinations Old <windfarms@jrc.co.uk>
Sent: 25 July 2024 19:34
To: [redacted]
Cc: Wind SSE
Subject: Beauly to Blackhillock to New Deer to Peterhead 400kV OHL - ECU00005165 - Request for Scoping Opinion - [WF227993]

Dear [redacted],

A Windfarms Team member has replied to your co-ordination request, reference **WF227993** with the following response:

Dear Sir/Madam,

Thank you for your advisory regarding the proposed Overhead Line (OHL) development:

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

ECU Number: ECU00005165

We have reviewed the current proposed OHL tower locations and have identified that those listed below have the potential to cause interference with the corresponding local Distribution Network Operator (DNO) link. Based on this assessment, we must object to the proposed locations until the final tower positions are agreed upon and confirmed to no longer pose an obstruction.

Interim Tower Number	JRC Tower Number	Eastings	Northings	Link ID	Secondary Link ID
BC2-7	14	251829	844305	JESHKS1-JESHKO23	JESHKS1-JESHKO24
BC3-3	17	252903	844345	JESHKS1-JESHKO12	
BC4-8	27	256311	843749	1350503/2	
BC5-4	32	257319	842631	0929340/1	
CB2-17	80	271841	840705	1040823/2	
CB10-8 (141)	247	321313	852692	0929293/1	
CB9C-19 _alt	260	316320	852962	0929267/2	
CB9C-20 _alt	261	316719	853094	0929267/1	
CB9C-21 _alt	262	317033	853195	0929267/1	
CB9C-27 _alt	268	318818	853556	0929267/1	
CB9C-34 _alt	275	321005	852792	0929293/1	
CB10-8 _alt	276	321313	852695	0929293/1	
CB10-18 (143)	286	324115	854557	0929267/2	
CB12-1 (149)	301	328011	857131	0929332/1	0929160/1
CB12-2 (149-1)	302	328289	857214	0929332/1	0929160/1
CB14-6 (172-5)	322	334973	856752	0929270/2	
CB14-16 (178-3)	333	338325	855642	0929268/1	
BN2-4	395	352316	844952	0929159/2	

BN2-11	402	354762	844176	JESHDS1-JESHDO20	
BN4G-20	429	363019	842748	0929274/2	
BN4-18	438	365715	842566	JESHEFS1-JESHEFO12	
BN6-18	487	380171	848782	JESHEFS1-JESHEFO04	
NP1-12	504	385380	848964	1218077/2	
NP1-18	510	387426	849339	JESHBNS01-JESHBNO29	JESHBNS01-JESHBNO23
NP1-25	517	289550	848458	JESHECS1-JESHECO17	
NP1-26	518	389866	848152	JESHECS1-JESHECO11	
NP2-2	520	390203	847600	JESHECS1-JESHECO03	
NP3-1	533	393684	844948	JESHBNS01-JESHBNO16	
NP4-27	571	405043	845449	JESHECS1-JESHECO01	

It is crucial to note that any changes to the development details, particularly the positioning or scale of any towers, will necessitate a re-evaluation of the proposal. We will require precise grid references for the final tower locations to ensure they do not interfere with existing infrastructure.

Our assessment is based on the best available data and known interference scenarios. However, we recognize that there may be unforeseen or inadequately predicted effects. Therefore, we cannot be held liable if unforeseen issues arise that we have not predicted.

Please note that our objection pertains only to the date of this issue. Given the dynamic nature of the spectrum use, you are advised to seek re-coordination before submitting a final planning application. This step will help mitigate the risk of objections arising from any new developments between your initial enquiry and the finalization of your project.

If you require any further assistance or have any questions, please do not hesitate to contact us by phone or email.

With best wishes,

The Windfarm Team

Friars House

Manor House Drive

Coventry CV1 2TE

United Kingdom

Office: 02476 932 185

JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.

Registered in England & Wales: 2990041

About The JRC | Joint Radio Company | JRC

Please adjust the specifics as necessary to fit the particular circumstances and details of the project at hand.

We hope this response has sufficiently answered your query.
If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email by clicking on the link below or login to your account** for access to your co-ordination requests and responses.

https://breeze.jrc.co.uk/tickets/view.php?id=33687

From: [redacted]
Sent: 30 July 2024 13:28
To: [redacted]
Cc: BBNP
Subject: Request for Scoping Opinion for Proposed Section 37 Application for Beauly to Blackhillock to New Deer to Peterhead 400kV OHL

Dear [redacted]

I refer to our previous request for an extension of time to respond to the above notification. It is disappointing that, although a generic response has been received as late as this morning, SSEN cannot supply important information in order to inform scoping responses. In the absence of that requested information our response can only be very limited at this stage.

The view of the Community Council is that:
- the need case should be fully set out including addressing the end market location, the carrying capacity of the OHLs, and the wind farms to be served by the infrastructure (including their installed capacity and current consenting status);
- the full suite of infrastructure, OHLs and sub-stations, from Spittal to Peterhead should be considered as a single project and the EIA-R should be for the whole project;
- the consideration of alternatives should be undertaken having regard to the above two points;
- further comment will be made when the scoping opinion and statutory consultee comments are available.

Regards

[redacted]
Chair
Kirkhill & Bunchrew Community Council

From: [redacted] on behalf of metofficesafeguarding <metofficesafeguarding@metoffice.gov.uk>
Sent: 17 July 2024 15:11
To: [redacted]
Subject: RE: Request for Scoping Opinion - Beauly to Blackhillock to New Deer to Peterhead 400kV OHL - ECU00005165

OFFICIAL

Dear [redacted]
Thanks for consulting the Met Office about this proposal. There would not be any adverse impact on the closest meteorological radar at Hill of Dudwick. Therefore the Met Office has no objections to the application and does not need to be consulted further.
Kind regards

[redacted]
Upper Air & Remote Sensing

Met Office, FitzRoy Road, Exeter, Devon, EX1 3PB, United Kingdom
E-mail: metofficesafeguarding@metoffice.gov.uk
Web: https://www.metoffice.gov.uk/services/business-industry/energy/safeguarding

Defence Infrastructure Organisation

[redacted]
Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

Your Reference: ECU00005165

Our Reference: DIO10060115

MoD Telephone: 07977410762
E-mail: DIO-safeguarding-statutory@mod.gov.uk

[redacted]
Scottish Government
Directorate for Energy and Climate Change
5 Atlantic Quay
150 Broomielaw
GLASGOW
G2 8LU

25 July 2024

Dear [redacted]

MOD Safeguarding – RAF Buchan and Military Low Flying System

Proposal: Scoping Opinion request for the proposed section 37 application for the Beauly to Blackhillock to New Deer to Peterhead 400kV OHL. The proposed development will comprise a new double circuit steel structure 400 kV OHL between Beauly, Blackhillock, New Deer and Peterhead, approximately 194km in length including the diversion of an existing 400kV OHL into a proposed new Coachford 400kV substation near Blackhillock, removal of the existing 132kV OHL from Beauly to Knocknagael substations, and rationalisation and crossings of the existing transmission network.

Location: Beauly to Blackhillock to New Deer to Peterhead, Aberdeenshire, Highland, Moray

Grid Ref:

	Easting	Northing
Beauly	248377	842674
Point 2	272156	840832
Point 3	296842	844109
Point 4	320759	852539
Point 5	336368	856318
Point 6	357033	843503
Point 7	381539	848192
Peterhead	405716	845566

[redacted]

[redacted]

[redacted] [redacted]

[redacted]

[redacted]

Moray Growth Deal

Innovation from Tradition

- Section 6.6.1 scopes out night-time visual assessment. The proposed transmission line passes through the safeguarding areas aircraft operations for RAF Lossiemouth. We would expect that the Ministry of Defence are consulted on any section 37 application but should there be a need for permanent lighting atop any pylons or other structures, then we would expect a night-time visual assessment to be undertaken.

Other Matters

Comments from Moray Council's Transportation service are appended to this response and should be considered when formulating the EIA Report.

Moray Council has been contacted by SSEN Transmission in respect of the suggested viewpoints for the LVIA assessment, as well as discussions on impacts of the proposed route (as well as other SSEN Transmission developments in Moray) on the woodland loss and compensatory planting.

I trust the above points are in order but if you have any questions on this or require further clarification/information, please do not hesitate to get in touch with me on the details at the top of this letter.

Please note that information about the application including application forms and drawings, consultation responses and representations received on the proposal will be published on the Council's website at http://publicaccess.moray.gov.uk/eplanning/

If you have included an email address in your letter, the Council would prefer to forward any further communications about the proposal using that address, unless you indicate otherwise.

Yours faithfully
Redacted

[redacted]
Acting Principal Planning Officer

From: [redacted]
Sent: 30 July 2024 12:28
To: [redacted]
Subject: Re: Request for Scoping Opinion - Beauly to Blackhillock to New Deer to Peterhead 400kV OHL - ECU00005165

Dear [redacted],

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR BEAULY TO BLACKHILLOCK TO NEW DEER TO PETERHEAD 400KV OHL

On behalf of the Nairn District Salmon Fishery Board, I note that the protected nature of migratory salmonids present in the River Nairn has been recognised in the Scoping Report. The potential for the presence of Freshwater Pearl Mussels has also been recognised.

Full pre-project monitoring of these species would be required to inform the least possible impact from the proposal, particularly with regard to the the precise alignment across the River Nairn. Irrespective of whether the direct riparian zone of the river will be disrupted or not, the full impact of any run-off from workings or ongoing permanent impacts on feeder burns entering the River Nairn would have to be fully considered in the EIA.

The Nairn DSFB would like to remain fully informed as the proposal progresses further, particularly with regard to the crossing of the line over the River Nairn catchment.

yours faithfully

[redacted]

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 09 July 2024 11:56
To: [redacted]
Cc: Econsents Admin
Subject: RE: Request for Scoping Opinion - Beauly to Blackhillock to New Deer to Peterhead 400kV OHL - ECU00005165 [SG34051]

Our Ref: SG34051

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NatureScot
Scotland's Nature Agency
Buidheann Nàdair na h-Alba

[redacted]
Onshore Electricity, Strategy and Consents
Directorate for Energy and Climate Change
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow G2 8LU
Sent by email to Econsents_Admin@gov.scot

22 July 2024
Our ref: CNS/DC/MOR

Dear [redacted],

Electricity Act 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Request for Scoping Opinion for Proposed Section 37 Application for Beauly to Blackhillock to New Deer to Peterhead 400 kV Overhead Line

Thank you for your consultation request.

Background

The Applicant has engaged with us throughout the planning stages of this proposal. We have provided feedback to them on their OHL Route Selection consultation and will shortly be providing further feedback on their OHL Potential Alignment. To date, our feedback has primarily focused on statutory protected areas where the OHL has potential to affect the protected natural features. We have however also offered comments on their approaches to surveys and methodologies for assessing the wide range of natural heritage interests encountered along the OHL route.

NatureScot comments on Scoping Report

SSEN's ongoing approach to consultation does afford us the confidence that the right level of information is being gathered to inform their Environmental Impact Assessment (EIA).

We agree with the topics and issues proposed to be scoped in and out and we are not aware of any further information we hold that could assist with the production of their EIA.

NatureScot advice on key issues identified at Scoping stage

Protected areas

The OHL project will impact on protected areas, and we are advising SSEN on the best design and mitigation measures to try to avoid significant adverse effects on protected features.

It is hoped that in most cases considerate design and implementation of best practices will avoid significant effects. There is however one site where the route selected will require new infrastructure, towers, access etc. within the protected area.

Torvean Landforms Site of Special Scientific Interest (SSSI) will be directly affected. The SSSI is designated for its Quaternary geomorphology (less than 10 million years old) containing an excellent range of fluvioglacial landforms (deposited by meltwater) comprising kame terraces, eskers and kettleholes.

If infrastructure can avoid key landform features, then it is hoped that irreversible damage to the geological interest can be avoided. Our work with SSEN is ongoing in this respect.

The potential effect on other protected areas is being considered and we are also engaged with SSEN regarding the production of their shadow Habitats Regulations Appraisal (HRA).

Peatland and carbon-rich soil

Class 1 and 2 peatlands *(as mapped through NatureScot's Carbon and Peatland Map 2016)* – Between the crossing of the A9 south of Inverness and the A941 in Moray the route crosses areas of Class 1 and 2 peatland where the extent of peatland would exceed the span between towers, meaning that impacts are unavoidable.

The quality of these habitats is not yet known, and we cannot therefore advise on their likely value and whether or not priority peatlands of national interest would be affected. The Applicant's ongoing work will inform this topic.

Concluding remarks

The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage and is given without prejudice to a full and detailed consideration of the impacts of the proposal if submitted for formal consultation as part of the EIA or planning process.

Please contact us if you require any further information or advice.

Yours sincerely

[redacted]
Operations Officer - North
[redacted]

cc. [redacted], SSEN Transmission

The Scottish Government
Energy Consents Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Network Rail
Town Planning
151 St Vincent Street
Glasgow
G2 5NW

Martin Henderson
Town Planning Technician

Planning reference: ECU00004997
Case Officer: [redacted]

E-Mail:
TownPlanningScotland@networkrail.co.uk

Network Rail ref: 211 2024
19/07/2024

Dear [redacted],

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR BEAULY TO BLACKHILLOCK TO NEW DEER TO PETERHEAD 400KV OHL

Thank you for consulting Network Rail regarding the above development.

We would strongly suggest that reference to the issues below are included in the Scoping Opinion to ensure that potential impacts of both the construction and completed development on the current and future safe and efficient operation of the railway are assessed:

- A Traffic Assessment should be included to assess the effects of construction traffic on existing traffic flows and the public road network. Preferred construction traffic routes should be indicated. This will enable Network Rail to assess the possible impacts where/if the traffic crosses over/under our infrastructure and the suitability of these crossings.

- Details of proposed construction and engineering works in the vicinity of the railway line. Any works over/adjacent to the railway corridor will be subject to further discussion and agreement with Network Rail.

Yours sincerely

Redacted

[redacted]
Town Planning Technician

[redacted]
Case Officer, Onshore Electricity
Strategy and Consents,
Directorate for Energy and Climate Change

By email: [redacted]

22 August 2024

Dear [redacted]

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR BEAULY TO BLACKHILLOCK TO NEW DEER TO PETERHEAD 400KV OHL

Thank you for consulting RSPB Scotland.

Please find our response to the questions posed in the Scoping report.

- **What environmental information do you hold or are aware of that will assist in the EIA described here?**

  We have recent Capercaillie data which could assist with the EIA. This information can be made available by submitting a data request to RSPB Scotland.

- **Do you agree with the proposed approach for baseline collection, and that the range of surveys across particular topics is sufficient and appropriate to inform the assessment of environmental effects?**

  The methodology for the baseline surveys in the Scoping Report is somewhat unclear, and more detail is needed to clarify whether what is proposed is adequate to inform the EIA and the assessment of the likely significant effects of the development. Section 8.2.14 of the Scoping Report states that a second season of breeding bird surveys will be carried out in 2024 focussing on areas

RSPB North Scotland
Aberdeen Office
easyHub, Royfold House,
Hill of Rubislaw, Aberdeen
AB15 6GZ

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rspb.org.uk/Scotland

The RSPB is part of BirdLife International, a Partnership of conservation organisations working to give nature a home around the world.

Chair of Council: Kevin Cox **President:** Dr Amir Khan **Chair, Committee for Scotland:** Dr Vicki Nash **Director, RSPB Scotland:** Anne McCall
The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654 Registered address: The Lodge, Potton Road, Sandy, Bedfordshire, SG19 2DL

where Target Species were identified to be breeding/lekking or where they were readily observed to be present. However, the report notes that no Capercaillie signs or sightings were recorded in 2023 by the consultant surveyors, therefore it is not clear if further survey work was carried out in 2024 for Capercaillie. RSPB has recent data of signs and sightings in this area, therefore, if further surveys were not completed in 2024, we would recommend that further survey work is carried out in March/April 2025 and in Winter 2025, to establish both Capercaillie breeding and occupancy. Prior consultation with RSPB Scotland as per NatureScot's 2017 'Recommended bird survey methods to inform impact assessment of onshore windfarms' is recommended to prevent crossover, unnecessary disturbance and potential unnecessary repetition of surveys. These surveys should cover at least 1.5km from previously recorded lek sites at Lethen, Newlands, Dulsie, Ferness and Ordiequish.

We recommend that the surveys for Common Crane should continue where the proposed route is expected to be located in peatland or lowland raised bog areas even when no birds were recorded in the first year of surveys. The Common Crane population in the North-east is continuing to expand and as peatland restoration is underway many of these areas may become suitable for breeding birds. The route should seek to avoid peatland habitat to avoid any potential disturbance and displacement issues.

- **Is there any other relevant existing baseline data that should be taken into account?**

  RSPB can provide 2023 and 2024 data for Capercaillie. This information can be made available by submitting a data request.

- **Are there any key issues or possible effects which have been omitted?**

  The proposed route intersects woodland that lies 2.4km from Darnaway and Lethen SPA for Capercaillie and 17km from Anagach SPA for Capercaillie. Dispersal distances for Capercaillie in the Autumn and early Spring can be up to 30km. Historically and currently the woodlands around Dulsie and Newlands have recorded male and female Capercaillie during the breeding season and thus these areas should be recognised and protected as crucial connecting woodlands between the two SPAs. The EIA Report must include sufficient information to allow the competent authority to carry out an appropriate assessment under the Habitat Regulations.

RSPB North Scotland
Aberdeen Office
easyHub, Royfold House,
Hill of Rubislaw, Aberdeen
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Tel: 01224 624824
Email: nsro@rspb.org.uk
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rspb.org.uk/Scotland

BirdLife INTERNATIONAL

The RSPB is part of Birdlife International, a Partnership of conservation organisations working to give nature a home around the world.

Chair of Council: Kevin Cox **President:** Dr Amir Khan **Chair, Committee for Scotland:** Dr Vicki Nash **Director, RSPB Scotland:** Anne McCall
The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654 Registered address: The Lodge, Potton Road, Sandy, Bedfordshire, SG19 2DL

- **Do you agree with the list of issues to be scoped out, and the rationale behind the decision?**

  Yes, noting we are only commenting on the ornithology section.

Biodiversity Net Gain (BNG) / Biodiversity Enhancement

The Scottish Government's Fourth National Planning Framework (NPF4) was adopted on 13 February 2023 and now forms part of the statutory development plan. RSPB Scotland believes that developments should leave nature in a better state than before and welcomes the requirement in Policy 3 of NPF4 that all developments must deliver biodiversity enhancement.

The proposal therefore should offer 'significant biodiversity enhancements' that can be 'secured within a reasonable timescale and with reasonable certainty' as required by policy 3iv) of NPF4. Any plans need to clearly set out what elements are proposed as mitigation and what is considered enhancement. Biodiversity Enhancement does not need to be included in the EIA Report but that may be the most appropriate place for it, if not, it should be set out in a clearly defined separate document.

Yours sincerely,

Redacted

[redacted]
Senior Conservation Officer, North East Scotland & Shetland

Co[redacted] SSEN Transmission

[redacted] NatureScot

RSPB North Scotland
Aberdeen Office
easyHub, Royfold House,
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BirdLife INTERNATIONAL

The RSPB is part of Birdlife International, a Partnership of conservation organisations working to give nature a home around the world.

Chair of Council: Kevin Cox **President:** Dr Amir Khan **Chair, Committee for Scotland:** Dr Vicki Nash **Director, RSPB Scotland:** Anne McCall
The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654 Registered address: The Lodge, Potton Road, Sandy, Bedfordshire, SG19 2DL

Canal House
1 Applecross St
Glasgow G4 9SP
www.scottishcanals.co.uk

[redacted]
Chief Executive
By email

1st August 2024

Directorate for Energy and Climate Change
Scottish Government

Proposal: **SECTION 37 APPLICATION FOR BEAULY TO BLACKHILLOCK TO NEW DEER TO PETERHEAD 400KV OHL**

Scottish Canals have reviewed the scoping report and associated documents relating to the proposed Beauly to Blackhillock to New Deer to Peterhead 400KV overhead line.

We would request that the following matters are considered and incorporated into the EIA.

General Comments:

The Caledonian Canal is a Scheduled Ancient Monument as noted in section 9 of the scoping report.
The Caledonian Canal is a functional waterway and is subject to existing transport criteria set out in the operational functioning of the canal.
Maximum mast height in the Caledonian Canal is 35m.
We note within the report that clearance beneath overhead wires at the pylon is 27.716m. This would suggest that with sag in the overhead wires, the clearance may be less than 27.716m where the overhead lines cross the canal.
For reference, the clearance under the Kessock Bridge, which is outwith the canal area is 27.4m.

Allowance should be made in the design of pylons and overhead wires to achieve clearance for the maximum mast height within the Caledonian Canal as stated above.

We request that waterborne canal traffic is considered within section 12 of the report, in order to maintain safe navigation along the full length of the Caledonian Canal.

Scottish Forestry
Coilltearachd na h-Alba

Glèidhteachais a Gàidhealtachd's nan Eilean
"Fearann – coilleach"
Rathad Fodderty
Inbhir Pheofharain

Highland and Islands Conservancy
"Woodlands"
Fodderty Way
Dingwall
IV15 9XB

highland.cons@forestry.gov.scot
Tel: 0300 067 6950

Conservator
Neach Dion Arainneachd
John Risby

30th July 2024

[redacted]
Scottish Government
Onshore Electricity, Strategy and Consents

by email: [redacted]

Dear [redacted]

ELECTRICITY ACT 1989: THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR BEAULY TO BLACKHILLOCK TO NEW DEER TO PETERHEAD 400KV OHL

Thank you for consulting Scottish Forestry on the Scoping Report for the proposed **BEAULY TO BLACKHILLOCK TO NEW DEER TO PETERHEAD 400KV OHL** (proposed development). Scottish Forestry is the Scottish Government agency responsible for policy, support and regulation of the forestry sector in Scotland. As such we comment on the potential impact of development proposals on forests and woodlands.

The first consideration for all woodland removal decisions should be whether the underlying purpose of the proposals can reasonably be met without resorting to woodland removal. Scottish Government's Policy on Control of Woodland Removal clearly sets out a strong presumption in favour of protecting Scotland's woodland resources.
https://forestry.gov.scot/support-regulations/control-of-woodland-removal

In line with Scottish Government's wider objective to protect and expand Scotland's woodland cover, applicants are expected to develop their proposal with minimal woodland removal. Woodland removal should be allowed only where it would achieve significant and clearly defined additional public benefits.

The following criteria for determining the acceptability of woodland removal should be considered relevant to this application –

- ***Woodlands with a strong presumption against removal***
  Only in exceptional circumstances should the strong presumption against woodland removal be overridden. Proposals to remove these types of woodland should be judged on their individual merits and such cases will require a high level of supporting evidence.

Scottish Forestry
Coilltearachd na h-Alba

Woodland removal with a need for compensatory planting

Scottish Forestry
Coilltearachd na h-Alba

Redacted

[redacted]

Tuesday, 16 July 2024

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Stepps
Glasgow
G33 6FB

Local Planner
Energy Consents Unit
5 Atlantic Quay
Glasgow
G2 8LU

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk

Follow Us

Dear Customer,

Beauly to Blackhillock - 400kV OHL, New Deer to, Peterhead, AB42 3DH
Planning Ref: ECU00005165
Our Ref: DSCAS-0113620-N8Z
Proposal: New double circuit steel structure 400 kV OHL between Beauly, Blackhillock, New Deer and Peterhead, approximately 194km in length located in the planning authority areas of Aberdeenshire Council.

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Drinking Water Protected Areas

A review of our records indicates that the proposed activity falls within several drinking water catchments where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive.

The River Ugie supplies Forehill Water Treatment Works (WTW). Burn Of Davidstone and Shenwell Spring supply Herrciks Water Treatment Works (WTW) and this is a particularly sensitive area so great care will need to be taken. Glenlatterach supplies Glenlatterach Water Treatment Works (WTW) and it is also a sensitive site where care will need to be taken. Glenlatterach supplies Glenlatterach Water Treatment Works (WTW) and it is also a sensitive site where great care will need to be taken. The Spey Boreholes, Dipple and the Ordiequish Collecting Chambers supply the Spey Scheme (Badentinan) Water Treatment Works (WTW) and ground water will need to be protected. The River Deveron (Muiresk Intake) supplies Turriff Water Treatment Works (WTW). Loch Ness supplies Invermoriston

[redacted]

Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

[redacted]

[redacted]

[redacted]

SEPA
Unit 6
4 Parklands Avenue
Holytown
Motherwell
ML1 4WQ

Tel: 03000 99 66 99
www.sepa.org.uk

Chair
Lisa Tennant

CEO
Nicole Paterson

[redacted]

[redacted]

SGN
Maintenance Operations
Scotland
Axis House
5-7 Lonehead dr
Edinburgh
EH28 8TG

Redacted

[redacted]

[redacted]

speysidecommunitycouncil@gmail.com

1 September 2024

ECU 00005165

This is the submission from Speyside Community Council in response to the Scoping Report for the Beauly to Peterhead 400kV overhead line submitted by SSEN.

It needs to be read alongside the submitted Scoping Report.

There are some additional requests for further information at the end of this document.

SECTION 1	**INTRODUCTION**
1.4 **1.4.1**	**Scoping Report Methodology** ***We do not agree that land use, accidents and disasters, electromagnetic fields, radio and TV interference and population and human health should be scoped out.***
1.5 **1.5.1** **1.5.3**	**Corridor, Route and Alignment Selection** ***It is acknowledged that consultations have been carried out with various stakeholders. However, little cognisance seems to have been paid to residential amenity.*** ***Please be explicit as to how public comments have influenced the selection of the 'Preferred Route'***

SECTION 2	DESCRIPTION OF PROPOSED DEVELOPMENT
2.1.1	**The construction of a new double circuit steel structure 400kV overhead transmission line.**
2.2.2	***Why subsea cables from Peterhead to England? Why not over land pylons?*** ***If you can underground the cables from Bridlington to Drax why are Scottish residents being denied this option?*** ***Are the Planning Rules different in England?***
2.3.3	***If some rationalisation works involve undergrounding of existing lines where there is a significant benefit. What benefit might that be and why won't this apply to the new overhead line?***
2.7.4	***Species Protection Plans. Great. Where do human beings fit into these plans?***
2.8.1	***Why can 't the existing OHL be upgraded?***
2.8.11	***Will there be compensatory planting?***
2.9	**Construction Employment and Hours of Work**
2.9.4	***7am until 7pm (BST), 7 days a week is unacceptable near residential properties.*** ***7am until 6pm GMT, 7 days a week is also unacceptable.***
2.10	**Construction Traffic**
2.10.2 and 2.10.4	***Traffic generated by other major planning applications in Sections 14,15,16,17, 18 and 19 need to be considered.***
SECTION 3	**EIA Approach and Methodology**
3.4	**Mitigation**

3.4.3	*What mitigation proposals are there for people forced to live close to these pylons and overhead cables?*
SECTION 4	**SUMMARY OF SECTIONS**
4.3.1	*Much of Section 2 follows the route of existing OHLs. Why not up grade rather than add to?*
SECTION 5	**PLANNING POLICY**
5.3.8 iii	*How will this proposal address unacceptable significant adverse impacts on –* *Landscape and visual impacts* *Electromagnetic disturbance* *Traffic impacts*
SECTION 6	**LANDSCAPE AND VISUAL AMENITY**
6.3.5 6.6.2	*This will add yet another industrial element into the landscape and it is difficult to see how any mitigation measures will make it more acceptable.* *We disagree that a separate RVAA should be scoped out.*
SECTION 10	**WATER AND GEOLOGICAL ENVIRONMENT**
10.6.1	*We disagree with the proposal to scope out these elements.*
SECTION 12	**TRAFFIC AND TRANSPORT**
12.3.1	*The cumulative effects of construction traffic for this and other major proposals in Sections 14, 15, 16, 17, 18 and 19 need to be factored in.*

SECTION 14	**NOISE AND VIBRATION**
14.3.3	***How will the noise from corona discharge be mitigated?***
	REQUEST FOR FURTHER INFORMATION
1)	**There are few, if any, pylons and overhead cables in Cairngorm National Park. They have been removed. Why, therefore, are communities in the National Park treated differently? They are free from the threat of pylons and overhead cables being erected close to their homes and they are saved from having the landscape industrialised. Those of us who do not live in The Park are definitely treated differently. Will SSEN please explain the rationale for this?**
2)	**Will SSEN please provide the comparative costs of both undergrounding and overgrounding the power lines along the route from Beauly to Peterhead?** **Clearly, the cabling can be subsea from Peterhead to Bridlington and undergrounded in England.**

From: [redacted]
Sent: 18 July 2024 13:06
To: [redacted]
Subject: SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR BEAULY TO BLACKHILLOCK TO NEW DEER TO PETERHEAD 400KV OHL

In response to your email of 8th July I am writting on behalf of Strathnairn Community Council with regard to Section 8 - Meall Mor to Dalcharn to lodge an objection due to its adverse effect on the Conservation Area of Culloden Battlefield and the SSSI area of Dalroy and Clava Landforms. This area is already crossed by two pyloln lines one crossing the Conservation Area and the other further south, the addition of a third, higher and more visible line of pylons is considered to be unacceptable.
Whilst we accept the need to transmit the power generated by the windturbines and hydro systems in the north of Scotland which has already altered the landscape, this transmission should not add to the damage of the landscape.
We would therefore submit that this section of the line should be laid underground, in the event that this is not agreed we would ask that the pylons be masked to blend into the background by painting them.

[redacted], Strathnairn Community Councillor - Planning Liaison

The Highland Council
Comhairle na Gàidhealtachd

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

A full Abnormal Loads Assessment report should be provided that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.

If no AILs are required, no further information is required in this regard.

I trust that the above is satisfactory but should you wish to discuss any issues raised in greater detail, please do not hesitate to contact me or alternatively, Alan DeVenny at SYSTRA's Glasgow Office on 0141 343 9636.

Yours faithfully

Redacted

[redacted]

[redacted]

Transport Scotland
Roads Directorate

cc [redacted] – SYSTRA Ltd.

From: Ugie Salmon <sales@ugie-salmon.co.uk>
Sent: 09 July 2024 08:58
To: [redacted]
Subject: RE: Request for Scoping Opinion - Beauly to Blackhillock to New Deer to Peterhead 400kV OHL - ECU00005165

Hello [redacted]
We would like to know what planning has gone in to protecting the wild salmon and sea trout, in the River Ugie and in the sea, that the operator would need to be responsible for ensuring that the present-day ecology and habitat before the project starts, will not in any way be diminished during the construction stage and in the ongoing operational stage of the project. This might include for instance SSEN financing electro fishing in various feeder burns close to the project before and after the construction. Obviously if there has been a detrimental affect this would show up in the electro-fishing reports and some form of remedy or compensation would be sought by the stakeholders in the River Ugie.
That would be one way of allaying fears of local interested parties and demonstrate that the SSEN or their contractors were serious in protecting the wild life in the area and especially in the River Ugie.
Kind regards

kind regards
[redacted] Chairman)
Ugie District Salmon Fishery Board

Lunar Ugie Salmon
Salmon Fish House
Golf Road
Peterhead
AB42 1LS
tel no. 01779 476209
email [redacted]
website www.ugie-salmon.co.uk
open Monday to Friday 8am - 5pm

UGIE SALMON 1585

Annex B

(

Reason:

Annex 1 (revised June 2023)

MD-SEDD – EIA Checklist

The generic scoping guidelines should ensure that all matters relevant to freshwater and diadromous fish and fisheries have been addressed and presented in the appropriate chapters of the EIA report. Use of the checklist below should ensure that the EIA report contains the following information; the absence of such information ***may necessitate requesting additional information*** which could delay the process:

MD-SEDD Standard EIA Report Requirements	Provided in application YES/NO	If YES – please signpost to relevant chapter of EIA Report	If not provided or provided different to MD-SEDD advice, please set out reasons.
1. A map outlining the proposed development area and the proposed location of: o the towers/poles, o permanent and temporary access tracks, including watercourse crossings; o buildings including substations; o permanent and temporary construction compounds; o all watercourses; and contour lines;			
2. A description and results of the site characterisation surveys for fish (including fully quantitative electrofishing surveys) and water quality including the location of the electrofishing and fish habitat survey sites and water quality sampling sites on the map outlining the proposed turbines and associated infrastructure. **This should be carried out where a Special Area of Conservation (SAC) is present and where salmon are a qualifying feature, and in exceptional**			

MD-SEDD Standard EIA Report Requirements	Provided in application YES/NO	If YES – please signpost to relevant chapter of EIA Report	If not provided or provided different to MD-SEDD advice, please set out reasons.
cases when required in the scoping advice for other reasons. In other cases, developers can assume that fish populations are present;			
3. An outline of the potential impacts on fish populations and water quality within and downstream of the proposed development area;			
4. Any potential cumulative impacts on the water quality and fish populations associated with adjacent (operational and consented) developments including wind farms, hydro schemes, aquaculture and mining;			
5. Any proposed site specific mitigation measures as outlined in MD-SEDD generic scoping guidelines and the joint publication "Good Practice during Wind Farm Construction" (https://www.nature.scot/guidance-good-practice-during-wind-farm-construction);			
6. Full details of proposed monitoring programmes using guidelines issued by MD-SEDD and accompanied by a map outlining the proposed sampling and control sites in addition to the location of all turbines and associated infrastructure. **At least 12 months of baseline pre-construction data should be included. The monitoring programme can be secured using suitable wording in a condition.**			

MD-SEDD Standard EIA Report Requirements	Provided in application YES/NO	If YES – please signpost to relevant chapter of EIA Report	If not provided or provided different to MD-SECC advice, please set out reasons.
7. A decommissioning and restoration plan outlining proposed mitigation/monitoring for water quality and fish populations. **This can be secured using suitable wording in a condition.**			

Developers should specifically discuss and assess potential impacts and appropriate mitigation measures associated with the following:	Provided in application YES/NO	If YES – please signpost to relevant chapter of EIA Report	If not provided or provided different to MD-SEDD advice, please set out reasons.
1. Any designated area **(e.g. SAC),** for which fish is a qualifying feature, within and/or downstream of the proposed development area;			
2. The presence of a large density of watercourses;			
3. The presence of large areas of deep peat deposits;			
4. Known acidification problems and/or other existing pressures on fish populations in the area; and			
5. Proposed felling operations.			