

# Braco West Substation

## Report on Consultation

February 2024



**Scottish & Southern**  
Electricity Networks

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TRANSMISSION

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# 1. Introduction

## 1.1. Purpose of this document

The purpose of this Report on Consultation (RoC) is to document the consultation responses received as part of our site selection consultation process for the proposed new Braco West 400kV substation and where appropriate, show how the option taken forward to the next stage has been informed by this process.

For consistency with this round of consultation, the proposed development in this report will be referred to as the Braco West 400kV substation. However, going forward, it will be referred to as Cambushinnie 400kV substation to reflect the location of the proposed site.

This Report details the consultation process undertaken, including details of consultation methods and advertising, those consulted and/or contributing to the process and it also summarises the feedback received, including objections, concerns, questions and statements of support. It sets out clearly how stakeholder feedback has influenced the decisions we have made and confirms the option we are taking forward.

## 1.2. Project Overview

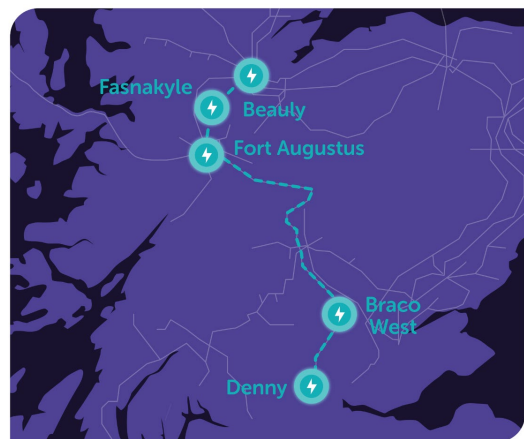
Based on the requirements outlined in National Grid ESO's Pathway to 2030 Holistic Network Design<sup>1</sup>, we have developed proposals to upgrade the existing Beauly to Denny overhead line (OHL) to allow both circuits to operate at 400kV. This requires new substations as well as extensions to our existing substations along the OHL.

The new Braco West 400kV substation project requires:

- Construction of a new outdoor, Air Insulated Switchgear (AIS), 400 kV substation;
- The approximate dimensions of the proposed substation are 380m x 315m;
- Tie in of the existing Beauly to Denny OHL infrastructure into the new substation;
- Areas for drainage, landscaping/screening and habitat enhancement;
- Temporary areas will also be required during construction for laydown and welfare.

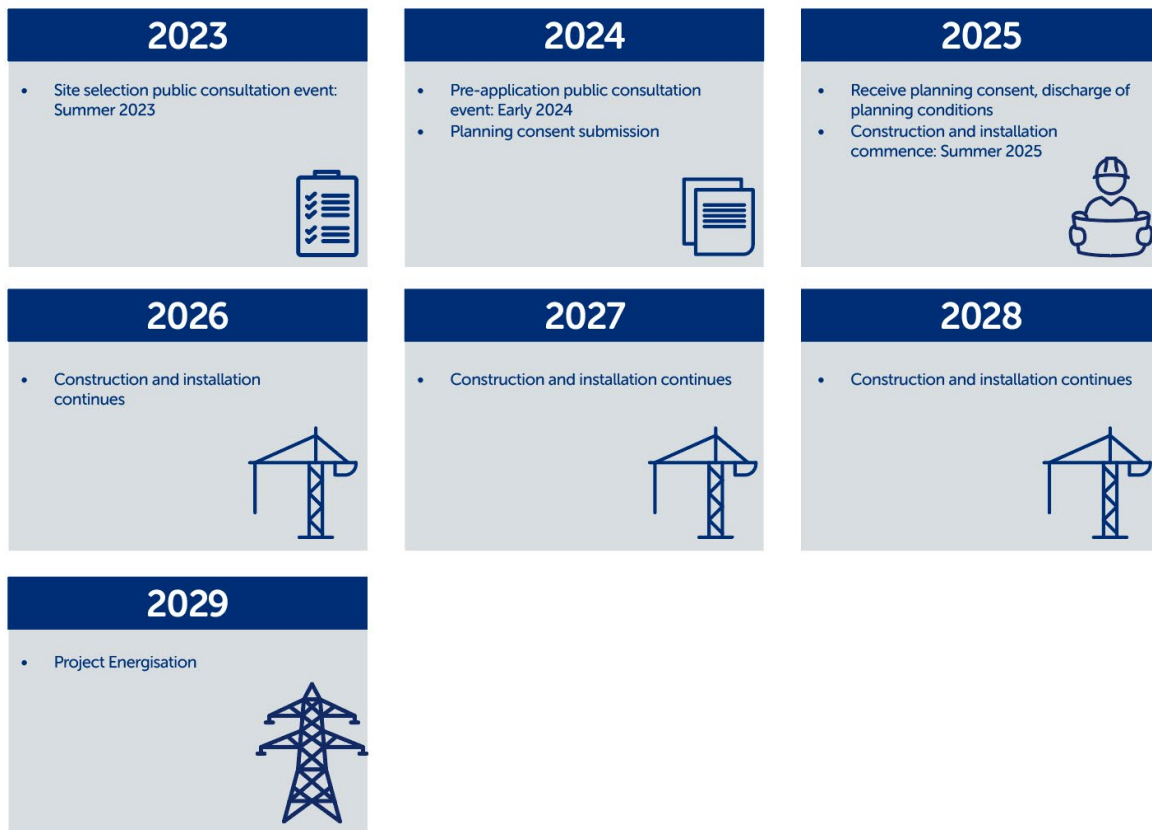
Please refer to the following webpage for a summary of the wider Beauly to Denny OHL proposed works:

[Beauly Denny 400kV Upgrade - SSEN Transmission \(ssen-transmission.co.uk\)](https://www.ssen-transmission.co.uk/Beauly-Denny-400kV-Upgrade)



<sup>1</sup> [A Holistic Network Design for Offshore Wind | ESO \(nationalgrideso.com\)](https://www.nationalgrideso.com)

### 1.3. Project Timeline



Find out more about our 2030 projects: [sssen-transmission.co.uk/projects/2030-projects/](https://sssen-transmission.co.uk/projects/2030-projects/)

### 1.4. What we were consulting on

As a stakeholder-led business, we understand the importance of involving communities and key stakeholders throughout each stage of our 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.

During this consultation, we presented options regarding our site selection for the proposed new Braco West 400kV substation. The consultation included information regarding technology options, environmental and technical considerations, the project development process and explained the factors which were taken into consideration in the selection process. The consultation explained how Site Option 2 (Figure 1.1) provides the best balance of environmental and technical considerations from our internal assessments.



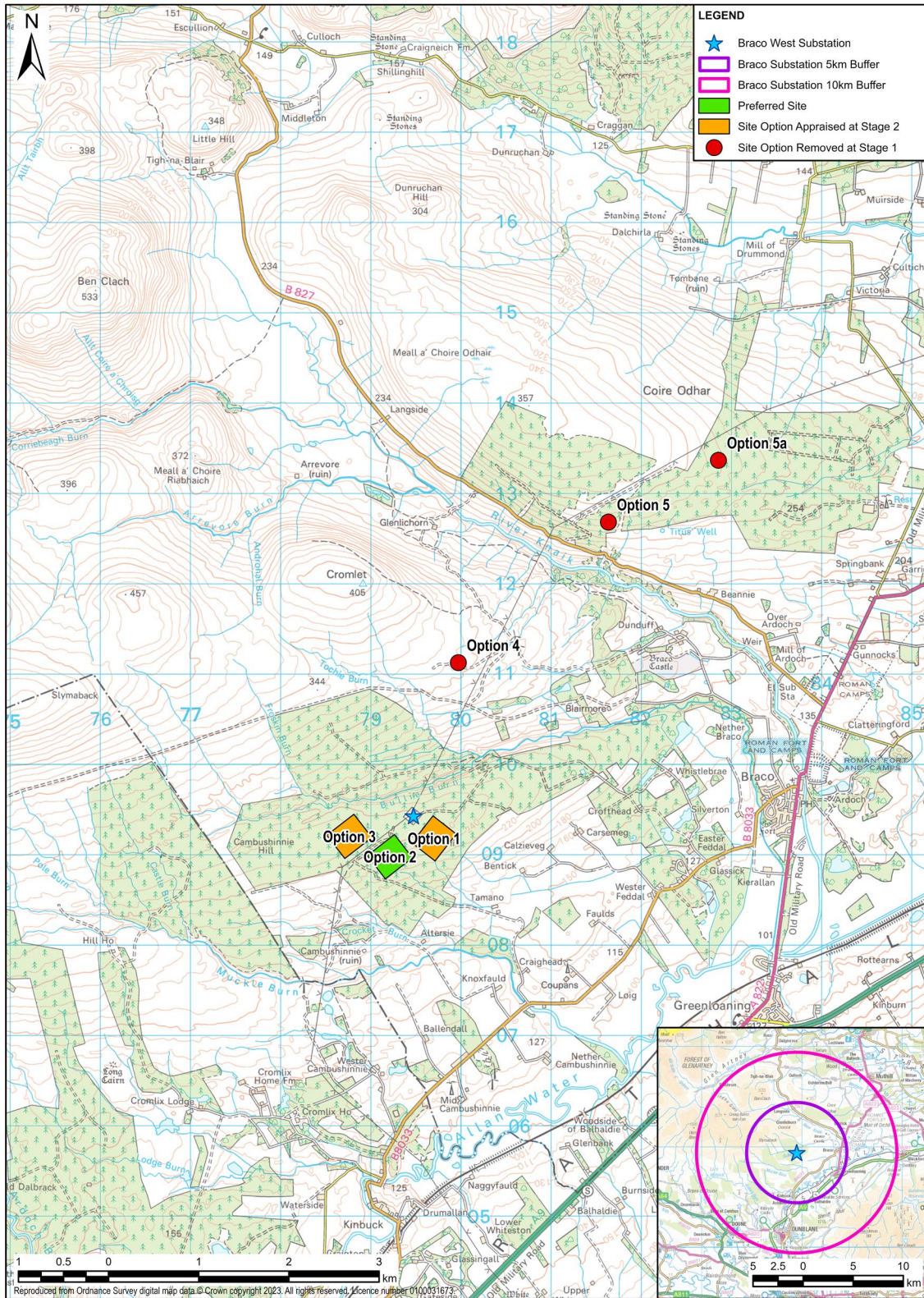


Figure 1.1 – Site Options

## 2. The Consultation Process

### 2.1. Who we consulted with

Our consultation process sought to capture the views of anyone who had an interest in our proposals, and we invited comments from all interested parties. During our engagements we aimed to ensure that we captured the views of:

- statutory consultees
- non-statutory consultees
- community members and local organisations; including local elected members
- landowners and occupiers

### 2.2. Consultation feedback period

The public consultation period was open from 22 August until 3 October 2023.

Statutory Consultees were invited to provide feedback on our Consultation Document between 22 August 2023 and 3 October 2023. Where possible, affected landowners were contacted ahead of the consultation period to discuss land related considerations or concerns.

### 2.3. The advertising process

The consultation events were advertised extensively using the following methods:

- The Perth & Kinross Courier and The Scotsman.
- Our social media channels and the dedicated project webpage.
- Community Councillors and Local Elected Members were emailed in advance with information and a poster they could share within their local area.
- A maildrop including a postcard insert was sent to 4,225 homes and businesses within a ten-kilometre radius of the potential sites. A copy of the postcard invite can be found in Appendix B.

## 2.4. Stakeholder participation

In August 2023 we launched our initial consultation on site selection for the proposed Braco West substation providing an introduction and starting our engagement process.

Consultation events
Public Consultation Event
Braco Village Hall
22 August 2023
60 attendees

Attendance figures reflect the number of people who had registered attendance at the consultation event.

## 2.5. Feedback volume

Feedback from our stakeholders was welcomed via a range of methods. This included online or hard copy feedback forms, emails or letters, notes from the consultation events or stakeholder meetings or from any relevant telephone conversations.

Responses to public consultation



Responses from statutory and non-statutory consultees:

Seven statutory bodies and 21 non-statutory consultees of relevance to the project, were contacted and requested to provide feedback on the proposals. 15 formal responses were received with a summary of each listed in the Project Specific Feedback Section 3.2 and provided in Appendix A.

### Stakeholder representations

Non-statutory organisations that were not directly approached by us, have responded to the consultation through the public consultation channels. All their comments have been taken on board and were analysed for this Report along with the public consultation responses.



## 3. Consultation Feedback and Our Response

### 3.1. Common Themes

Across all of our Pathway to 2030 project consultations, we received feedback covering a number of common themes. Although some of this feedback related to topics which fell outside of the scope of our consultations, we recognise that it is important to address the points that our stakeholders took the time to raise, which we have summarised in this section. In addition, we have also developed a set of Frequently Asked Questions (FAQ) that can be viewed [here](#).

#### Project Need

The need for these projects has been independently assessed by both the GB Electricity System Operator, National Grid ESO (ESO); and the GB energy regulator, Ofgem.

Some responses questioned whether these projects are needed at all. In many cases, those questioning the need have done so as the electricity these projects will connect and transport is not all needed in the north of Scotland.

Under our licence, we have a legal obligation to provide connections to electricity generators looking to connect to our network and we do not determine the location of new electricity generation. This is led by generators themselves, often underpinned by Government targets and policies.

These projects - which are part of a major upgrade of the electricity transmission network across Great Britain - are needed to unlock the north of Scotland's vast renewable electricity resources and transport that power to demand centres across the UK.

The renewable electricity these projects will transport will play a key role in meeting UK and Scottish Government renewable energy and climate change targets. They will also help secure the country's future energy independence by reducing dependence on imported power from volatile wholesale energy markets.

For more details on why these projects are needed and how this need has been assessed, we have published [a short briefing paper](#).

#### Technology Choice

Several respondents have questioned the technology choice, particularly why the infrastructure cannot all be installed subsea or underground, instead of overhead line steel lattice towers.

Due to the significant volume of power we need to connect and transport from generation source to areas of demand the ESO concluded that there is a need for both onshore and offshore network reinforcements.



The ESO's and Ofgem's independent assessment of need for this project and our wider Pathway to 2030 programme was also based on the technology choices we are progressing.

Underground cabling is highly sensitive to ground conditions and terrain. There can be significant and lasting environmental impacts and future land use constraints associated with undergrounding; together with the technical challenges of operating, maintaining and in the event of a fault, restoring power.

Cost is also an important consideration, with subsea and undergrounding significantly more expensive than overhead. As the cost of investing in the electricity transmission network is ultimately recovered by electricity bill payers across GB, cost is one of the key factors in the ESO's and Ofgem's assessment of need, and in Ofgem's future assessment of the costs we are allowed to recover for these projects.

### Environmental impacts

We have received feedback highlighting concerns about potential environmental impacts, particularly on local biodiversity.

As one of the greatest risks to our natural environment and biodiversity is climate change, these projects are 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. A key way we do this for the environment is to follow the mitigation hierarchy. Firstly, we seek to avoid sensitive areas wherever possible and 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 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.

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 peatland or ancient woodland), we have also introduced a commitment to restore more habitat than we affect. You can find out more about how we are delivering a positive environmental legacy by [clicking here](#).

In the following section of this Report on Consultation, we will address any specific environmental feedback relevant to the options we consulted on.

## Socio-Economic impact

Several community responses highlighted concerns about the impact on the local community, including visual and tourism impacts. We have also been asked what local benefits these projects will provide.

We acknowledge that there will inevitably be a visual impact on some local communities and are committed to do all that we can to minimise and mitigate this as part of the ongoing development of this project. The environmental assessment that will accompany our consent applications will also consider landscape and visual impacts.

From a tourism perspective, as part of our consent application, we intend to consider socio-economic and tourism impacts as part of the suite of documentation to be submitted to relevant consenting authorities. This will ensure that appropriate consideration is given to these issues in the consenting process.

These projects will also provide significant benefits to local and national economies. Independent socio-economic analysis undertaken on our Pathway to 2030 projects has estimated that they will collectively support around 20,000 jobs across the UK, around 9,000 of which are expected in Scotland, [adding billions of economic value](#) to the economy.

We also expect these projects to deliver significant local benefits, including direct and indirect job opportunities, alongside supply chain opportunities for local businesses. We will set out more details of these opportunities in due course, including ‘Meet the Buyer’ events to introduce local businesses to the opportunities presented through our main supply chain partners.

We are also committed to introducing community benefit funding, recognising the important role host communities will play in delivering the infrastructure required to meet our national endeavours to build a cleaner, more secure and affordable energy system for homes and businesses across Scotland and Great Britain in the long-term.

In the following section of this Report on Consultation, we will address any specific community feedback relevant to the options we consulted on.

## Consultation process

We have received some feedback that our consultation process was not well promoted to affected communities or wider stakeholders and concerns around the timescale provided for feedback to be given.

As we set out in the ‘Consultation Process’ section of this Report on Consultation, we held a number of public consultation events, public meetings and bilateral and group engagements, using a range of methods to promote our consultations to our stakeholders.

Even at this early stage of development, where our consultation activities are voluntary, we fully recognise the importance of gathering stakeholder input to help inform our development plans. In response to stakeholder feedback, we introduced extensions to our consultation period to encourage anyone interested in these projects to provide their feedback. In addition, we would like to highlight that there will be further opportunity to comment on our proposals through the consenting process and would encourage all stakeholders to fully engage in that formal consultation exercise.

We fully recognise there is always room for improvement and as we look forward to the next round of public consultations, we are committed to apply learning from our first round of consultations to increase awareness, accessibility and coverage of consultation events. We will continue to welcome feedback on how we can further improve how we consult with our stakeholders on our projects.

## 3.2. Specific Project Related Feedback

### Introduction

This section of the report provides our responses to the questions and themes emerging from the public consultation and the responses provided by statutory and non-statutory stakeholders. Feedback was collated and analysed by the project teams, to produce relevant data and key themes.

Consultation responses have been grouped by the following project themes, 'Community Impact', 'Environmental Impact', and 'Economic Impact' and stakeholders were grouped into the categories outlined in the table below.

Stakeholder Group	Examples
Statutory Consultees	Historic Environment Scotland (HES), SEPA, NatureScot, Local Authorities
Non-Statutory Consultees	RSPB, Scottish Water, Forestry and Land Scotland
Community members and local organisations	Homeowners, local businesses, Residents Associations, elected members
Landowners & occupiers	Landowners, crofters, tenant farmers, occupiers of properties in closest proximity to substations

## Community Impact

Summary of feedback	Contributing Stakeholder Group	Our Response
BT conclude that the Project should not cause interference to BT's current and presently planned radio network.	Non-Statutory Consultees	Noted.
Joint Radio Company have concluded that they do not have any concerns about the Proposed Development.	Non-Statutory Consultees	Noted.
National Air Traffic Services (NATS) reviewed the Proposed Development from a technical safeguarding aspect and concluded that they have no safeguarding objection to the proposal. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.	Non-Statutory Consultees	Noted.
A preference for Site 3 was indicated, primarily regarding potential visual impacts.	Community, organisations & officials	<p>Site Option 3 is located at the highest elevation and on more exposed land of the three options taken forward for further assessment. Site Option 2 is considered to provide greater opportunity to incorporate landform screening than Site Option 3 due to the landform.</p> <p>In developing the site further, the design will consider:</p> <ul style="list-style-type: none"> <li>The colour of the buildings when viewed from key locations. This will be supported by the use of 3D models and has been done successfully on other sites, working with the local planning authority and key community representatives.</li> </ul>



		<ul style="list-style-type: none"> <li>• Ground Investigation (GI) results at the Site which will allow the designers to identify a platform level that is as low as possible while balancing drainage and earthworks considerations, enabling surplus material to be used to create new organic landforms in front of key parts of the site to minimise landscape and visual impacts. This work involves input from a specialist Landscape Architect.</li> </ul>
Concern was raised regarding the level of communication from SSEN to local stakeholders.	Landowners and occupiers	Please refer to our <a href="#">FAQs</a> for information on our approach to optioneering and consultation with communities and landowners.
Concern was raised for the use of the B8033 for construction access, as it is a popular cycling and running route.	Community, organisations & officials	A traffic and transport assessment will be included in the planning application. Mitigation will be identified and implemented during construction works through the use of a construction traffic management plan (CTMP). This will look to minimise impacts during construction.
Concerns were raised regarding the site selection process to date.	Community, organisations & officials	<p>Our approach to optioneering is underpinned by our statutory obligations, as set out in the Electricity Act Schedule 9, to ‘develop and maintain an efficient, coordinated and economical electricity transmission system’. Having regard to the “desirability of preserving the natural beauty, of conserving flora, fauna and geological and physiographical features of special interest and protecting sites, buildings and objects of architectural, historic or archaeological interest; and do what we reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites buildings or objects’.</p> <p>As a result, our optioneering process has sought to balance technical and cost considerations with environmental considerations. This has culminated in the selection of the proposed option which is economically viable, technically feasible, minimises impacts on important resources or features of the environment and reduces disturbance to those living in it, working in it, visiting it or using it for recreational purposes.</p>

		<p>To do this we have considered specific topic areas within the environmental, technical and cost categories and assessed each in terms of the potential for the option to be constrained. We allocated a Red/Amber/Green (RAG) rating to each topic to highlight where potential issues may be present and have used this to help compare the different options. The appraisal seeks to compare the wider implications of each option on the topics (both individually and combined) and reach a reasoned conclusion, on balance across all topics, as to the option to take forward. Any weighting of certain criteria as being of more importance than other criteria depends on project specific considerations.</p> <p>The culmination of this process identifies a ‘proposed option’ that will be taken forward to detailed design, environmental assessment and consent applications.</p> <p>Please refer to our FAQs for further information.</p>
<p>Concerns were raised regarding access disruption and impacts on the road quality and road surfacing.</p>	<p>Landowners and occupiers</p>	<p>A traffic and transport assessment will be included in the planning application. Mitigation will be identified and implemented during construction works through the use of a construction traffic management plan (CTMP). This will look to minimise impacts during construction.</p>
<p>Suggestions of opportunities for local project support included:</p> <ul style="list-style-type: none"> <li>• Upgrading the core path between Kinbuck and Ashfield and Dunblane.</li> <li>• Assisting the Muthill to Crieff school project.</li> <li>• Glen Road project.</li> </ul>	<p>Community, organisations &amp; officials</p>	<p>Suggested opportunities are noted and will be explored further as the project moves towards construction.</p>

## Environmental Impact

Summary of feedback	Contributing Stakeholder Group	Our Response
<p>SEPA stated that option 2 appears to have the highest value in terms of biodiversity gain. They would like to see detail for the habitat improvement included in future applications. They have also detailed that no peat assessment has been made available, to date, for any of the options. SEPA conclude that, with evidence of peat in the area, it would be useful if consideration of options would also compare the impact on peat as avoidance of development on peat is a requirement of policy 5 of NPF4. SEPA would also like to see some information on the potential impact of the use of lime mix on the surrounding acidic habitats if present.</p>	<p>Statutory Consultees</p>	<p>We note SEPA expectations for information provision to support a planning application. Consultation with SEPA will be undertaken to ensure appropriate information is provided. This will include information on the use of lime mix where practicable.</p> <p>A Biodiversity net gain (BNG) assessment will be undertaken to demonstrate how habitat improvement will be achieved.</p> <p>Peat probing has been completed at Site Options 2 and 3 in late 2023 to support peat assessment, design refinement and the production of a peat management plan. Peat probing has identified significantly deeper peat at Site Option 3 compared with Site Option 2.</p>
<p>Perth and Kinross Council have detailed the following comments and requirements:</p> <ul style="list-style-type: none"> <li>- A Woodland Survey will be required.</li> <li>- Compensatory tree planting is required on a ratio of 1:3 for every tree lost.</li> <li>- Ecological survey is required in the form of an Ecological Impact Assessment (EclA).</li> <li>- The proposal is located on class 5 carbon rich soils. Where policy exceptions allow for development that would disturb</li> </ul>	<p>Statutory Consultees</p>	<p>Perth and Kinross Council (PKC) requirements to inform a planning application are noted and the information will be provided to support.</p> <p>Further consultation with PKC will be undertaken to inform the assessments and reporting.</p> <p>An EIA screening request has been submitted to PKC in December 2023.</p>

<p>carbon rich soils, the development should be informed by:</p> <ul style="list-style-type: none"> <li>○ Appropriate peat survey and management plan</li> <li>○ Disturbance or excavation be minimised</li> <li>○ Assessment of likely effects on carbon dioxide emissions, and suitable mitigation measures</li> <li>○ Minimise carbon emissions</li> <li>○ Detail how development could contribute towards local or strategic peatland habitat enhancement or restoration.</li> </ul> <ul style="list-style-type: none"> <li>- Site Biodiversity Action Plan. Development lighting should be low lux-level, downward facing and directed away from ecological sensitivities.</li> <li>- A Landscape and Visual Impact Assessment should be provided.</li> <li>- A noise and lighting assessment should be provided.</li> <li>- A Transport Assessment/Statement including a Construction Traffic Management Plan</li> <li>- A Drainage Impact Assessment may be required.</li> </ul> <p>With respect to decommissioning and restoration the application will need to address</p>		
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<p>the policy requirement: LDP Policy 33(h) and NPF4 Policy 11(e)xii.</p>		
<p>NatureScot highlighted that there is the potential for habitat to support water voles within Site 1. Water voles are protected by the Wildlife and Countryside Act 1981 (as amended).</p> <p>NatureScot advise that there will be no likely significant effect for the qualifying interests of any relevant designated sites.</p>	<p>Statutory Consultees</p>	<p>Appropriate ecology surveys will be undertaken to inform a planning application.</p> <p>We note NatureScot consider that there will be no likely significant effect for the qualifying interests of any relevant designated sites.</p>
<p>Historic Environment Scotland (HES) have confirmed that no assets which fall within their remit exist within Site Option 2.</p> <p>HES recommend that the impacts of the proposed development on the historic environment should be assessed.</p>	<p>Statutory Consultees</p>	<p>Environmental assessment will include a cultural heritage assessment to assess the potential effects on the historic environment. This assessment and reporting will be submitted as part a planning application.</p> <p>The assessment will identify any mitigation measures and commitments to be incorporated in the design, construction and operational phases of the Proposed Development.</p>
<p>Scottish Water have confirmed that all options, apart from Site Option 5a, do not fall within a Scottish Water drinking water catchment or water abstraction source.</p> <p>Site Option 5a falls within the catchment boundary for the River Earn which supplies Glenfarg Water Treatment Works (WTW). Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive.</p>	<p>Non-Statutory Consultees</p>	<p>Site Option 5a has been discounted.</p>



<p>Scottish Forestry state that they would expect to see details of compensatory planting included within the final development proposals with location, type, and size.</p>	<p>Statutory Consultees</p>	<p>SSEN Transmission will provide details of compensatory planting arrangements as part of a planning application.</p>
<p>Forth District Salmon Fishery Board detail there is little to distinguish Site Options 1, 2, and 3 with regards to salmonoids. They have provided detailed advice for finalising the project design, which covers:</p> <ul style="list-style-type: none"> <li>• Construction impacts on rivers</li> <li>• Culverts</li> <li>• Run-off during operations</li> </ul>	<p>Non-Statutory Consultees</p>	<p>SSEN Transmission will ensure appropriate mitigation is identified and committed to during construction and operation of the Proposed Development.</p> <p>The advice will be incorporated into the design phase of the Proposed Development where applicable.</p>
<p>Forth Rivers Trust indicated their preference for Site Option 2 as it “seems to minimise ecological impacts while maximising potential for BNG”. They would also like to see SSEN move forward with supporting restoration works in the local area.</p> <p>Forth Rivers Trust are currently involved in delivering a number of restoration projects in the Allan Water catchment, which provide opportunities for SSEN to provide environment and biodiversity support.</p>	<p>Non-Statutory Consultees</p>	<p>SSEN Transmission note Forth Rivers Trust highlight opportunities for restoration projects. These opportunities will be investigated where appropriate.</p>
<p>Concern was raised with the perception that SSEN Transmission is proposing to destroy the historic environment surrounding Cambushinnie and the wider area around it.</p>	<p>Community, organisations &amp; officials</p>	<p>Environmental assessment will include a cultural heritage assessment to assess the potential effects of the Proposed Development on the historic environment. This assessment and reporting will be submitted as part of a planning application.</p>

<p>Concern raised over an increase in water run-off, especially in relation to Site Option 2.</p>	<p>Landowners and occupiers</p>	<p>An environmental assessment will include a hydrology, hydrogeology and soils assessment to assess the potential effects of the Proposed Development on the water and ground environment. This assessment and reporting will be submitted as part of a planning application.</p> <p>The assessment will identify any mitigation measures and commitments to be incorporated in the design, construction and / or operational phase of the Proposed Development.</p>
<p>Concerns raised over the rating of Site Options 1 and 2, in relation to noise, with the belief they should be rated as more impactful.</p>	<p>Landowners and occupiers</p>	<p>A noise site selection screening tool was used to inform the initial assessment. The results confirmed all three Site Options would be classified as Red rating, which is the most impactful rating.</p> <p>An environmental assessment, which will support a planning application, will include a noise impact assessment to assess the potential effects of the Proposed Development on nearby receptors.</p> <p>The assessment will identify any mitigation measures and commitments to be incorporated in the design, construction and operational phases of the Proposed Development.</p> <p>Appropriate noise limits, both during construction and operation, will be agreed in consultation with the local authority and the proposed development will not be permitted to exceed these limits.</p>
<p>It was raised that consideration should be given to disturbance to species habitats for all sites. However, further concern is raised for Site Option 2 with regard to ecology / the environment.</p>	<p>Community, organisations &amp; officials</p>	<p>The environmental assessment will include ecology and ornithology assessment to assess the potential effects of the Proposed Development. This assessment and reporting will be submitted as part of a planning application.</p> <p>The assessment will identify any mitigation measures and commitments to be incorporated in the design, construction and / or operational phase of the Proposed Development.</p>

<p>Transport Scotland noted that if Abnormal Load Deliveries (ALD) are required, it will require to be satisfied that the size of loads proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.</p> <p>Transport Scotland request that an 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.</p> <p>In addition, it states a threshold assessment in accordance with the IEMA Guidelines for the Environmental Assessment of Road Traffic will be required, to determine whether there are likely to be any significant environmental issues associated with increased traffic on the trunk road network, and any requirement for further trunk road assessment. This can be undertaken as part of the planning application process and further guidance can be provided at the formal scoping stage.</p>	<p>Statutory Consultees</p>	<p>We will ensure consultation with Transport Scotland occurs as required throughout the project.</p> <p>The environmental assessment will include a traffic and transport assessment to assess the potential effects of the Proposed Development on the local and wider transport network. This assessment and reporting will be submitted as part of a planning application.</p> <p>The assessment will identify any mitigation measures and commitments to be incorporated in the design, construction and operational phases of the Proposed Development.</p>
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## Economic Impact

Summary of feedback	Contributing Stakeholder Group	Our Response
<p>Scottish Forestry raised concern regarding Scottish Government's Policy on Woodland Removal and the repayment of grant aid where they have granted for the proposed area.</p>	<p>Statutory Consultees</p>	<p>We are aware of the obligation to repay grant aid and have discussed further with Scottish Forestry. Repayment will be completed where applicable and in consultation with Scottish Forestry.</p> <p>The environmental assessment will include a forestry assessment to assess the potential effects of the Proposed Development. This assessment and reporting will be submitted as part of a planning application.</p> <p>Compensatory planting arrangements will be provided as part of the planning application and will comply with UK Forestry Standard (UKFS) and associated applicable guidelines.</p> <p>We seek to avoid felling of forestry or woodland in the first instance. However, where this is unavoidable, forestry assessment will be undertaken and will identify any mitigation measures and commitments to be incorporated in the design, construction and / or operational phase of the Proposed Development. Planting will be supported by an approved replanting plan and shall identify the location, species and woodland design, timing, maintenance, monitoring, and reporting standards.</p>
<p>Concerns were raised for the rural economy and the potential visual impacts that could negatively affect this economy.</p>	<p>Community, organisations &amp; officials</p>	<p>From an economic perspective, we intend to consider socio-economic and tourism impacts as part of the assessment to be submitted in support of a planning application. This will ensure that appropriate consideration is given to these issues in the consenting process.</p> <p>Please refer to our <a href="#">FAQs</a> for further information.</p>

<p>Concerns were raised in regard to traffic and transport considerations and how construction traffic will access the Proposed Development.</p>	<p>Landowners and occupiers</p>	<p>The environmental assessment will include a traffic and transport assessment to assess the potential effects of the Proposed Development on the local and wider transport network. This assessment and reporting will be submitted as part of a planning application.</p> <p>The assessment will identify any mitigation measures and commitments to be incorporated in the design, construction and operational phases of the Proposed Development.</p>
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## 4. Summary of Key Decisions

Having reviewed and considered the stakeholder feedback that we received during the consultation period, in conjunction with the results from our detailed site selection process, we propose to progress Site Option 2 into detailed design and environmental assessment, culminating in a planning application to Perth and Kinross Council (PKC).

For the consultation event, 6 sites were initially identified as part of the Stage 1 site screening process, however an assessment of technical and environmental impact considerations ruled out 3 of the sites, with the remaining 3 sites taken forward to Stage 2. There was no significant feedback from the consultation that prompted one of those 3 sites ruled out to be reconsidered and included in Stage 2.

Further comparative assessments were carried out as part of the Stage 2 detailed site selection process using a RAG Rating, which was presented as part of the consultation process. Site Option 2 was identified as our Preferred Site option based on a balance of engineering, environmental and cost considerations. This was due to the Site Option 2 having less potential for protected habitats and preferable engineering considerations than other Options, including site slope requirements and the ability of the site to tie into the existing overhead line without significant new infrastructure.

During the consultation process, we recognise that feedback was provided from local residents that Site Option 3 would be preferable, as it is located further away, on the top of the hill and that the site would be less visible within the wider landscape, resulting in potentially lesser landscape and visual impacts. We recognise that this is a large development, and that landscape design will play an important role in reducing its landscape and visual impact. In response, we carried out Ground Investigation (GI) works in November 2023 at both Site Options 2 and 3 to understand the suitability of ground conditions. The presence of widespread peat at Site Option 3, compared with limited peat deposits at Site Option 2, confirmed that Site Option 3 would have significant environmental and engineering constraints relating to the excavation of deep peat. This would be likely to significantly increase the biodiversity and carbon impacts of the project.

Overall, Site Option 2 (Figure 4.1) remains the Preferred Site following the completion of the site selection consultation process. Consequently, a decision has been made to progress with Site Option 2 as the Proposed Site to be taken forward to consent application.

In response to feedback regarding traffic and transport impacts, the access route to the substation site is being assessed in detail, with a number of options being explored to access the site with the aim of reducing environmental impacts where possible.

In addition, we have renamed the Proposed Development to Cambushinnie Substation to reflect the geographical location of the site on Cambushinnie Hill.

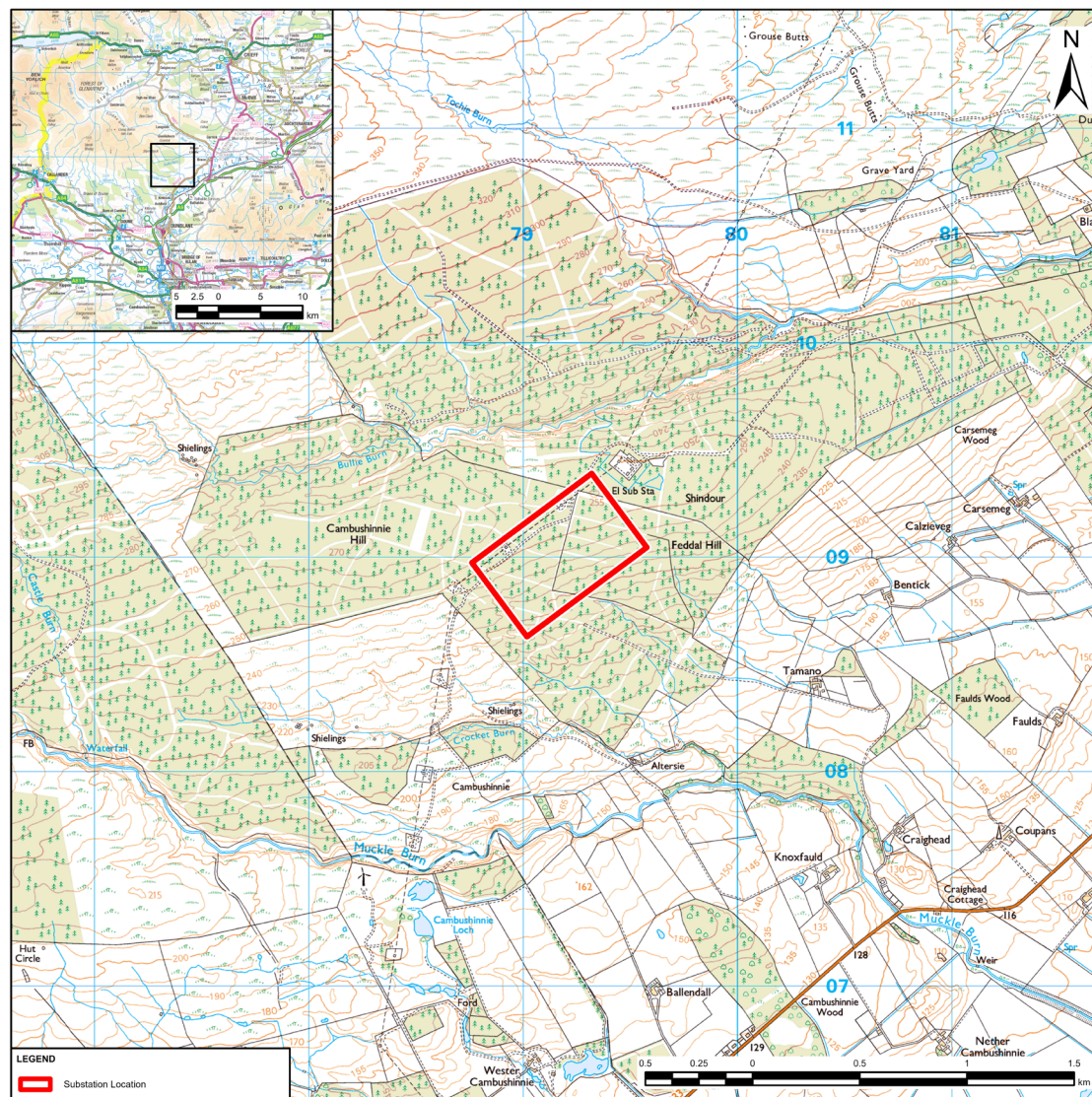


Figure 4.1 – Braco West 400kV substation proposed site

# 5. Next Steps

## 5.1. Ongoing Engagement

The period of consultation described in this report is part of an ongoing engagement process that spans the full development cycle for the project, where feedback is sought at different stages and engagement with stakeholders is continuous as we refine our proposals.

Early Engagement	Ongoing Detailed Engagement	Advanced Engagement	Ongoing Engagement
<ul style="list-style-type: none"> <li>Project webpage live</li> <li>Early meetings offered to elected members</li> <li>Early discussion with statutory consultees</li> <li>Initial Project Consultation</li> </ul>	<ul style="list-style-type: none"> <li>Analysis of feedback recieved from consultation</li> <li>Proactive and responsive stakeholder follow up meetings</li> <li>Engage community working groups</li> <li>Publish FAQs, project updates and next steps</li> <li>Publish a Report On Consultation</li> <li>Engage on the report on consultation e.g. Webinar</li> </ul>	<ul style="list-style-type: none"> <li>Pre-consultation engagement</li> <li>Further project consultation</li> <li>Analysis of feedback recieved from consultation</li> <li>Follow up meetings</li> <li>Publish FAQs, project updates and next steps</li> <li>Publish a Report On Consultation</li> <li>Engage on the report on consultation e.g. Webinar</li> </ul>	<ul style="list-style-type: none"> <li>Pre-submission information sharing event</li> <li>Targeted engagement with those most affected</li> <li>Working group meetings</li> <li>Ongoing project updates</li> <li>Post consent and construction</li> </ul>

Following publication of this Report, we, alongside specialist consultants and contractors, will further develop the design of the Proposed Development.

In Spring 2024, we will hold our next public consultation. At this consultation stakeholders will be provided with proposed design and layout of the substation and overhead line tie-ins accompanied with further environmental and technical information. We submitted a request for an Environmental Impact Assessment (EIA) Screening Opinion for the substation development to PKC in December 2023 to confirm if the Proposed Development constitutes EIA Development and an EIA Report (EIAR) is required to support a planning application.

Should the Screening Opinion confirm that the project is EIA, then a request for an EIA Scoping Opinion will be submitted to PKC in early 2024. This will identify the scope of impacts to be addressed and the method of assessment to be applied.

A similar request for EIA Screening and Scoping Opinions will be made to the Scottish Government Energy Consents Unit (ECU) for the proposed overhead line tie-ins in early 2024. These will be the subject of a separate consent application under s37 of the Electricity Act 1989 to Scottish Ministers.

## **5.2. Feedback**

If you have any further views at this stage, then please get in touch with our Community Liaison Manager at [BDUP@sse.com](mailto:BDUP@sse.com).

Community Liaison Manager

Scottish and Southern Electricity Networks Transmission

1 Waterloo Street,

Glasgow

G2 6AY

Further information about the project is also available on the project website:

<https://www.ssen-transmission.co.uk/BDUP>

## 6. Glossary

Term	Definition
Air Insulated Switchgear (AIS) Substation	An AIS substation is constructed with switchgear which relies on open air components, which can require large clearance areas for operation and safety, which takes up a larger area of land than Gas Insulated Switchgear (GIS).
Alignment	A centre line of an overhead line OHL, along with location of key angle structures.
Amenity	The natural environment, cultural heritage, landscape and visual quality. Also includes the impact of SHE Transmission's works on communities, such as the effects of noise and disturbance from construction activities.
Ancient Woodland	Defined in National Planning Framework (NPF) 4 as " <i>land that has maintained continuous woodland habitat since at least 1750</i> ".
Ancient Woodland Inventory (AWI)	AWI is a provisional guide to the location of Ancient Woodland. It contains three main categories of woodland, all of which are likely to be of value for their biodiversity and cultural value. These include Ancient Woodland, Long-established woodlands of plantation origin (LEPO), and other woodlands.
Area of Search (Study Area)	A broad geographical area within which possible sites might be capable of identification within approximately 5km of the required connectivity point; usually determined by geographical features such as coastlines or hill/mountain ranges, or designation boundaries, such as National Park boundaries.
Biodiversity Net Gain (BNG)	Biodiversity Net Gain (BNG) is an approach to development that aims to leave the natural environment in a measurably better state than it was pre-development. It focuses on the change in the biodiversity value of a site, comparing the pre and post construction biodiversity values to ensure a positive impact overall.
Conductor	A metallic wire strung from support structure to support structure, to carry electric current.
Consultation	The dynamic process of dialogue between individuals or groups, based on a genuine exchange of views and, normally, with the objective of influencing decisions, policies or programmes of action.
Corridor	A linear area which allows a continuous connection between the defined connection points. The corridor may vary in width along its length; in unconstrained areas it may be many kilometres wide.
Double circuit	A double circuit transmission line comprises of two independent circuits each made up of three sets of conductors (cables).



Environmental Impact Assessment (EIA)	A formal process set down in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 used to systematically identify, predict and assess the likely significant environmental impacts of a proposed project or development.
Engagement	The establishment of effective relationships with individuals or groups.
Electricity System Operator (ESO)	National Grid is the Electricity System Operator (ESO) for Great Britain. The ESO balances electricity supply and demand to ensure the electricity supply.
Gardens and Designed Landscapes (GDLs)	The Inventory of Gardens and Designed Landscapes lists those gardens or designed landscapes which are considered by a panel of experts to be of national importance.
Gas Insulated Switchgear (GIS) Substation	A GIS substation is constructed with switchgear with gaseous reliant components which allows operation and safety clearances to be reduced compared to an AIS substation.
Habitat	Term most accurately meaning the place in which a species lives, but also used to describe plant communities or agglomerations of plant communities.
Holford Rules (as modified)	Principles developed by the late Lord Holford in 1959 which continue to be employed as the basis for routeing high voltage overhead lines and include additional notes on the siting of substations.
Kilovolt (kV)	One thousand volts.
Landscape Character Type (LCT)	A distinct, recognisable and consistent pattern of elements in a landscape that differentiate the area from another.
Listed Building	Building included on the list of buildings of special architectural or historic interest and afforded statutory protection under the 'Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997' and other planning legislation. Classified categories A – C(s).
Micrositing	The process of positioning individual structures to avoid localised environmental or technical constraints.
Mitigation	Term used to indicate avoidance, remediation or alleviation of adverse impacts.
National Scenic Area (NSA)	A national level designation applied to those landscapes considered to be of exceptional scenic value.
Offshore Integrated Link	Offshore cable connection between the onshore network and offshore network being developed as part of the Coordinated Offshore Network. This is being developed as a result of the Holistic Network Design (HND) publication in summer of 2022 produced by National Grid Electricity System Operator (NGESO) to facilitate greater co- ordination and efficiency for offshore windfarms. In the autumn of 2022 Ofgem published their Asset Classification findings which in turn

meant SSENT were tasked with delivering large parts of the Coordinated Offshore Network.

Overhead line (OHL)	An electric line installed above ground, usually supported by lattice steel towers or wooden poles.
Planning Application	Used in this context to describe an application for consent under the Town and Country Planning (Scotland) Act 1997.
Plantation Woodland	Woodland of any age that obviously originated from intentional planting.
Preferred Option	The option which SSEN Transmission believes offers the best balance of technical and environmental impact considerations identified through initial assessment. This is then subject to consultation with stakeholders, where local and previously unknown considerations may confirm or alter the initial preference. Once confirmed, this becomes the Proposed Option to take forward to the next stage of project development.
RAG Rating	A Red, Amber, Green rating provided to allow for a comparison between different options being appraised.
Red Line Boundary (RLB)	This area should include all land necessary to carry out the Proposed Development.
Riparian Woodland	Natural home for plants and animals occurring in a thin strip of land bordering a stream or river.
Route	A linear area of approximately 1 km width (although this may be narrower/wider in specific locations in response to identified pinch points / constraints), which provides a continuous connection between defined connection points.
Routeing	The work undertaken which leads to the selection of a proposed alignment, capable of being taken forward into the consenting process under Section 37 of the Electricity Act 1989.
Scheduled Monument	A monument which has been scheduled by the Scottish Ministers as being of national importance under the terms of the 'Ancient Monuments and Archaeological Areas Act 1979'.
Section 37 Application	An application for consent under Section 37 of the Electricity Act 1989 to develop an overhead electricity line.
Semi-natural Woodland	Woodland that does not obviously originate from planting. The distribution of species will generally reflect the variations in the site and the soil. Planted trees must account for less than 30% of the canopy composition
Site of Special Scientific Interest (SSSI)	Designated area of national importance for natural heritage. The aim of the SSSI network is to maintain an adequate representation of all natural and semi-natural habitats and native species across Britain.

Span	The section of overhead line between two structures.
Special Area of Conservation (SAC)	An area designated under the EC Habitats Directive to ensure that rare, endangered or vulnerable habitats or species of community interest are either maintained at or restored to a favourable conservation status.
Special Landscape Area (SLA)	Landscapes designated by The Highland Council which are considered to be of regional/local importance for their scenic qualities.
Special Protection Area (SPA)	An area designated under the Wild Birds Directive (Directive 74/409/EEC) to protect important bird habitats. Implemented under the Wildlife and Countryside Act 1981.
Stakeholders	Organisations and individuals who can affect or are affected by SHE Transmission works.
Study Area	The area within which the corridor, route and alignment study takes place.
Substation	A node on the network to allow safe control of the electricity network. This could include convergence of multiple circuits, transformation of voltage or other functions to maintain and operate the electricity network.
Substation Site Area	Site area identified as necessary to deliver all the substation infrastructure requirements e.g. platform, access tracks, temporary construction area, drainage including SUDS, landscaping.
Sustainable Urban Drainage Systems (SUDS)	Drainage solutions that provide an alternative to the direct channelling of surface water through networks of pipes and sewers to nearby watercourses.
Terminal Structure	A structure (tower or pole) required where the line terminates either at a substation or at the beginning and end of an underground cable section.
The National Grid	The electricity transmission network in the Great Britain.
UK Biodiversity Action Plan (UK BAP)	The UK BAP was published in 1994 after the Convention on Biological Diversity. It summarised the most threatened species and habitats in the UK and gave detailed plans for their recovery.
Volts	The international unit of electric potential and electromotive force.
Wayleave	A voluntary agreement entered into between a landowner, upon whose land an overhead line is to be constructed, and SHE Transmission
Wild Land Area (WLA)	Those areas comprising the greatest and most extensive areas of wild characteristics within Scotland.
Works	Constructing new transmission infrastructure such as substations, overhead lines, underground cables; major refurbishment of these; the dismantling and removal of any parts of the system; and associated works, which may include formation of access tracks, bridge and road improvements, tree cutting, drainage etc.

## 7. Appendices

### 7.1. Appendix A – Statutory Consultee Feedback

Summary of feedback	Our Response
<p><b>Historic Environment Scotland</b></p> <p>Feedback from Historic Environment Scotland (HES) stated that they understand that the proposals for the new substation have considered a number of options which has culminated in a ‘preferred option’ for which its comments are related to.</p> <p>HES agree with the Site Selection Consultation Document’s conclusion that there are no differentiators between the three options considered in regard to HES interests. HES also confirmed that there are no assets that fall within its remit within Option 2, the Preferred Option.</p> <p>HES noted, however, a number of historic environment assets whose settings have the potential to be adversely impacted by the current proposals. HES stated the list should not be treated as exhaustive, and it is only intended as a reference to those assets which at this stage appear may experience adverse impacts on their setting. Further information on a number of these assets was provided as an annex to its response letter. The assets identified by HES are:</p> <ul style="list-style-type: none"> <li>• Cromlix Lodge, Long Cairn 1000M WNW of (SM6556)</li> <li>• Cromlix Lodge, Hut Circle 1000M NNW of (SM6557)</li> <li>• Fort, Grinnan Hill (SM3088)</li> <li>• Ardoch, Roman Military Complex 900m NNE of Ardoch Bridge (SM1601)</li> <li>• Battle of Sherriffmuir (BTL17)</li> <li>• Cromlix House, Sundial and Flanking Pair of Gatepiers (LB3997)</li> <li>• Braco (GDL00067)</li> </ul>	<p>Environmental assessment will include a cultural heritage assessment to assess the potential effects on the historic environment. This assessment and reporting will be submitted as part of the planning application.</p> <p>The assessment will identify any mitigation measures and commitments to be incorporated in the design, construction and / or operational phase of the Proposed Development.</p>

HES stated the impacts of the proposed development on the historic environment should be assessed and recommended that this assessment should take account of the guidance provided in the EIA handbook and the HES Managing Change in the Historic Environment guidance on setting.

### NatureScot

NatureScot (NS) confirmed the proposed development lies within close proximity of a number of designated sites. Further information on these can be found on the NatureScot SiteLink website.

NS noted the proposed development lies within approximately 5 km of the South Tayside Goose Roosts Special Protected Area (SPA) designated for populations of breeding and wintering wildfowl. Although the proposed sites fall within the designated species' foraging range NS advised that the proposed development will have no likely significant effect on the above SPA. This is due to its location surrounded by coniferous forestry and distance from the SPA.

NS noted the proposed development is within approximately 5 km of the Shelforkie Moss Special Area of Conservation (SAC) and Carsebreck and Rhynd Lochs Site of Special Scientific Interest (SSSI) designated for their wetland areas. However, there is no connectivity between the proposed development and the above designated sites. NS advise that the proposed development will have no likely significant effect on the above SAC.

NS stated the potential for habitat that could support water voles was noted at site Option 1. Water voles are protected by the Wildlife and Countryside Act 1981 (as amended). NS stated should Option 1 be progressed, the standing advice on the NS website for development that could affect water voles.

In conclusion, NS advised there will be no likely significant effect for the qualifying interests of all relevant designated sites.

Site option 1 has been discounted with Site option 2 to be progressed.

Appropriate ecology surveys will be undertaken to inform future planning application(s).

We note NatureScot's opinion considers that there will be no likely significant effect for the qualifying interests of any relevant designated sites.

### Perth and Kinross Council

Perth and Kinross Council (PKC) requirements to inform the planning application are noted and the information will be provided to support.

A response from Perth and Kinross Council (PKC) provided pre-application advice on the proposed site options, focussing on site option 2, the 'preferred option'. PKC noted site designations and constraints as follows:

- Potentially visible from core path BRAC/111; path from Feddal Road at Braco Hall to Braes of Doune, Stirling and BRAC/108; B8033 at Wester Feddal to B8033 Muckle Burn via Bentick.
- Carsebreck and Rhynd Lochs Site of Special Scientific Interest (SSSI)
- Shelforkie Moss Special Area of Conservation (SAC)
- Drummond Lochs SSSI/Upper Strathern Oakwoods SAC
- Semi-natural woodland.
- Potential groundwater vulnerability.
- Protected species in surrounding area.
- Archaeology in surrounding area.
- Pockets of surface water flood risk from within the site.
- Visual impact on LCA – Lowland Hills-Tayside.
- National Grid pipeline.
- Peatland.

PKC stated and listed relevant planning policies and guidance noting the National Planning Framework 4 (NPF4) is the Scottish Government's long-term spatial strategy with a comprehensive set of national planning policies. This strategy sets out how to improve people's lives by making sustainable, liveable and productive spaces. NPF4 was adopted on 13 February 2023. NPF4 has an increased status over previous NPFs and comprises part of the statutory development plan.

PKC also noted local development plan policies and guidance, and listed out those relevant to the proposed development.

PKC state National and Local Planning Policies support the shift from fossil-fuels to renewable and low carbon energy sources. PKC noted the following;

- The principal policy considerations are NPF4 Policy 11 Energy which supports all forms of renewable, low-carbon and zero emissions technologies (including new and replacement transmission and distribution infrastructure), Policy 11 provides considerable policy support

Further consultation with PKC will be undertaken to inform the assessments and reporting.

An EIA screening request has been submitted to PKC in December 2023.

to the proposal, however, proposals are expected to demonstrate how specific considerations have been taken in to account through project design and mitigation (Policy 11e).

- LDP Policy 33A supports new proposals subject to an assessment of individual and cumulative effects of developments on amongst other factors, the natural and built heritage, the amenity of neighbouring uses and traffic generation. LDP Policy 33B specifically encourages low carbon energy solutions where specific grid connection or the use of established infrastructure can occur.

PKC provided detailed comments as below:

***Policy 40: Forestry, Woodland and Trees***

The Council will apply the principles of the Scottish Government Policy on Control of Woodland Removal and there will be a presumption in favour of protecting woodland resources. Where the loss of woodland is unavoidable, mitigation measures in the form of compensatory planting will be required.

A woodland survey will be required outlining the impact of the proposed development on the woodland resource. The mitigation hierarchy of avoid, reduce and compensate should be followed to reduce impacts of development to woodland, trees and biodiversity.

There is a strong presumption against the removal of ancient semi-natural woodland in the Scottish Government Policy on Control of Woodland Removal unless removal of woodland would achieve significant and clearly defined additional public benefits. Compensatory tree planting is required on a ratio of 1:3 for every tree lost. Details on what is required is provided in the Planning for Nature Supplementary Guidance Planning Guidance - Planning & Biodiversity - Perth & Kinross Council ([pkc.gov.uk](http://pkc.gov.uk))

**Actions: Provide a tree/woodland survey, detailed landscaping plan and planting schedule.**

***Policy 41: Biodiversity***

The Council will seek to protect and enhance all wildlife and habitats, whether formally designated or not, considering natural processes in the area. Planning permission will not be granted for

development likely to have an adverse effect on protected species unless clear evidence can be provided that the ecological impacts can be satisfactorily mitigated.

The submitted information for this application is detailed and comprehensive, in particular Table 2 in the Site Selection Consultation document. It is agreed that Option 2 appears to have less impact on biodiversity, however, this needs to be confirmed via ecological survey. Ecological survey is required in the form of an Ecological Impact Assessment (EclA). Details of survey requirements are outlined in the PKC Planning for Nature Supplementary Guidance Planning Guidance - Planning & Biodiversity - Perth & Kinross Council ([pkc.gov.uk](http://pkc.gov.uk)).

Impact assessments are required for habitats, species, and existing trees on site including the impact of new artificial lighting. Evidence of application of the mitigation hierarchy in the form of avoid, reduce, compensate, and enhance must be demonstrated in the submitted EclA. Particular attention is drawn to peatland and dry heath habitats.

**Actions: Provide an Ecological Impact Assessment**

***LDP Policy 51 and NPF4 Policy 5a, c & d (Soils)***

**Peatland**

The site is located 50m from planning reference 22/02231/FLM where peat is present, and a peat survey and management plan were required. The same advice applies under LDP2 Policy 51.

The proposal is located on class 5 carbon rich soils. Policy consideration includes NPF4 Policy 5 c)i. which allows development proposals for essential infrastructure where there is a specific locational need and no other suitable site. National policy aligns with LDP Policy 51: Soils. In terms of the specific locational need, it is accepted that available site locations are largely dependent on proximity to existing grid infrastructure, however, NPF4 Policy 5 intent is *'to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development'*. And Policy 5d indicates that where carbon-rich soils could be impacted assessments are needed.

LDP2 Policy 51: Soils - Development will only be permitted on areas of carbon-rich soils, including peatland, where it has been clearly demonstrated that there is no viable alternative, or where the



economic and social benefits of the development would outweigh any potential detrimental effect on the environment. The presence of any carbon rich soils, including peatland, will be required to be validated through the undertaking of appropriate field surveys. Where exceptions allow for development that would disturb carbon rich soils, development should be informed by:

- an appropriate peat survey and management plan;
- any disturbance or excavation be minimised;
- an assessment of the likely effects of the development on carbon dioxide emissions, and suitable mitigation measures implemented to minimise carbon emissions (with details of both submitted as part of the application); and
- details setting out how the development could contribute towards local or strategic peatland habitat enhancement or restoration.

Note: Reference should be made to the Scottish Soils website including the Carbon and Peatland map (SNH). Carbon-rich soils are considered to be Class 1, 2 and 5 soils contained in the Carbon and Peatland Map.

**Actions: Provide a Peat Survey, Peat Management Plan and Carbon Balance Assessment.**

### ***Biodiversity Enhancement***

Enhancement of biodiversity should be demonstrated in all projects and needs to be site specific based on surveys, location, development size, surrounding habitats and landscape character, and follow ecologist recommendations.

Conclusions from the EclA and requirements detailed in the PKC Planning for Nature Supplementary Guidance should be used to create a Site Biodiversity Action Plan. It should contain quantity, locations, techniques, timescales, and monitoring arrangements. Development lighting should be low lux-level, downward facing and directed away from hedgerows, treelines and woodland to avoid fragmentation of foraging and commuting opportunities for bats.

A checklist of information required to inform a planning application regarding biodiversity is provided in Annex 4 of the PKC Planning for Nature Supplementary Guidance. Applicants are encouraged to ensure information is submitted in accordance with the checklist to reduce future information

requests and delays Planning Guidance - Planning & Biodiversity - Perth & Kinross Council (pkc.gov.uk).

**Actions: Provide an Ecological Impact Assessment, Site Biodiversity Action Plan and biodiversity enhancements.**

### ***NatureScot Input***

PKC stated NatureScot had been consulted as part of the pre-application process. We also consulted NatureScot separately with the response summarised separately in this appendix.

**PKC however ask for the provision of a Phase 1 Habitat Survey including Protected Species Survey**

### ***Landscape and Visual Amenity***

There is no specific landscape policy in NPF4, however, Policy 4(a) states that development proposals which have an unacceptable impact on the natural environment will not be supported. In terms of the LDP2, Policies 1 and 39 require developments to contribute positively to the quality of the surrounding built and natural environment and to not conflict with maintaining and enhancing the landscape qualities of Perth and Kinross. LDP2 Policy 39 also seeks to safeguard and enhance landscape character and green infrastructure. Whilst no specific details have been provided in terms of floor/elevational drawings, the proposed design will most likely be set by technical requirements, type of equipment and infrastructure required. Given the rural landscape and location the visual impact of the proposal will most likely be minimal as it will be surrounded by a coniferous tree plantation, however, where there is likely to be views from adjacent core paths, new landscape planting around the perimeter of the site would help mitigate this.

Given its proposed location in close proximity to the adjacent substation, it would not appear out of context, however, measures to help mitigate its views would be welcomed and help to provide a scheme which is less intrusive when compared to the existing substation. In association, LDP2 Policy 1B requires consideration to be given to a proposal's visual impact and landscape setting. In terms of enhancement and mitigation, LDP2 Policy 40 supports planting of new trees and woodlands and new landscape planting around the perimeter of the site should be considered.

**Action: Provide a Landscape and Visual Impact Assessment.**

#### ***Residential Amenity***

In respect of residential amenity, NPF Policy 14 aligns with LDP2 Policy 55 which seeks to avoid proposals which result in lighting with obtrusive and/or intrusive effects. Additionally, NPF Policy 23 aligns with LDP2 Policy 56 which sets a presumption against siting of development proposals involving elevated levels of noise in the locality of existing or proposed noise sensitive land uses. The context sees the closest residential properties of Tamano and Bentick Farm over 1km south east of the proposed site. Further information in respect of lighting and noise will require to be submitted with the application.

**Actions: Provide a Noise and Lighting assessment.**

#### ***Roads and Access***

NPF4 Policy 13 aligns with LDP2 Policy 60 which requires local road networks and accessibility requirements are sufficient and capable of absorbing traffic generated by development, and also that satisfactory access is provided. Policy requirements need to be addressed through the submission of Transport Statements.

**Actions: Provide a Transport Assessment/Statement including a Construction Traffic Management Plan.**

#### ***Drainage and Flooding***

In respect of the flood risk and drainage, there are no known flooding concerns identified within the site, however, the proposal will require to be designed to ensure the provision of appropriate and effective drainage for the site in terms of surface water in order to comply with NPF Policy 22 and LDP2 Policy 53.

**Actions: A Drainage Impact Assessment may be required. Communication with PKC Flood Team is recommended.**

### ***Health and Safety***

The access track crosses over National Grid infrastructure. The proposal must satisfy National Grid requirements to ensure that there will be no risk of damage and ensure compliance with NPF4 Policy 23 and LDP2 Policy 54.

**Actions: Liaise with National Grid.**

### ***Decommissioning and Restoration***

Decommissioning and restoration is particularly highlighted in LDP Policy 33(h) and NPF4 Policy 11(e)xii where consideration needs to be given to measures in place to safeguard or guarantee availability of finances to effectively implement decommissioning and restoration plans. If the proposed development is not to be permanent, this policy requirement will need to be met which may have to be through a financial bond secured through a s75 legal agreement. A restoration plan would also be required.

**Actions: The application needs to address the policy requirement (LDP Policy 33(h) and NPF4 Policy 11(e)xii).**

### ***Conclusion***

There is policy support for the principle of the development by NPF4 and the current LDP2 in particular NPF4 Policy 11 and LDP Policy 33. Other relevant policy as noted above will need to be satisfied, in particular NPF Policy 5 and LDP Policy 51. This will, however, require a robust policy justification and the above actions will require to be address in advance of the submission of a formal application.

The site may require an EIA but recommend a screening request is submitted in the first instance. If an EIA is not required a suite of supporting assessments (see below) will be required to ensure the predicted impacts can be mitigated.

PKC consulted with SEPA as part of its pre-application process. We also consulted with SEPA separately with the same response received. The SEPA response is reported on separately in this appendix.

#### **PLANS AND DOCUMENTS REQUIRED WITH PLANNING APPLICATION SUBMISSION**

- Site Location Plan
- Site Layout Plan
- Topographic Plan
- Cross Section Plans
- Finished Levels Plan
- Elevation Plans
- 3D Visualisations including from selected viewpoints
- Landscape and screening plan

**If not an EIA development PKC following Screening exercise, the following Reports/Assessments will be required:**

- Phase 1 Habitat Survey including Protected Species Survey
- Tree/Woodland Survey
- Transport Assessment/Statement including Construction Traffic Management Plan (CTMP)
- Flood Risk (Surface) including Drainage Assessment
- Cultural Heritage Assessment – Archaeology
- Construction Environment Management Plan (CEMP)
- Ground Investigation Survey including peatland and groundwater
- Noise and Lighting Assessment
- Supporting Planning Statement
- Design & Access Statement
- Landscape and Visual Impact Assessment
- Sustainability including Carbon Assessment
- Peat Management Plan
- Decommissioning and Restoration Plan (if required)
- Pre-Application Consultation (PAC) Report

### Scottish Forestry:

Scottish Forestry stated its concern is with regards Scottish Government's Policy on Woodland Removal and the repayment of grant aid where it has granted for the proposed area and would expect to see details of compensatory planting included within the final development proposals with location, type and size.

Environmental assessment will include a forestry assessment to assess the potential effects of the Proposed Development. This assessment and reporting will be submitted as part of a planning application.

Compensatory planting arrangements will be provided as part of a planning application and will comply with UK Forestry Standard (UKFS) and associated applicable guidelines.

We seek to avoid felling of forestry or woodland in the first instance. However, where this is unavoidable, forestry assessment will be undertaken and will identify any mitigation measures and commitments to be incorporated in the design, construction and / or operational phase of the Proposed Development. Planting will be supported by an approved replanting plan and shall identify, location, species and woodland design, timing, maintenance, monitoring, and reporting standards.

### SEPA

SEPA would welcome receipt and discussion around the proposed design prior to formal submission to avoid delays. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site to avoid delay and potential objection. If there is a significant length of time between scoping and application submission the developer should check whether our advice has changed.

SEPA confirm all maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded where possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable. Cabling must be laid in ground already disturbed such as verges. A

We note SEPA expectations for information provision to support the planning application. Consultation with SEPA will be undertaken where necessary to ensure appropriate information is provided. This will include information on the use of lime mix where practicable.

Biodiversity net gain (BNG) assessment will be included in the planning application and demonstrate how habitat improvement will be achieved.

Peat probing has been completed at Site Options 2 and 3 in late 2023 to support peat assessment, design refinement and the production of a peat management plan. Peat probing has identified significantly deeper peat at Site Option 3 compared with

comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.

Site option 2. Site Option 2 is to be taken forward into the design and application stage.

SEPA state the site layout should be designed to minimise watercourse crossings and avoid other direct impacts on water features. The submission must include a map showing:

- All proposed temporary or permanent infrastructure overlain with all lochs and watercourses;
- A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works. Measures should be put in place to protect any downstream sensitive receptors.

SEPA provided a link to best practice guidance.

SEPA recommended reference to its Flood Risk Standing Advice for advice on flood risk. And confirmed crossings must be designed to accommodate the 0.5% Annual Exceedance Probability flows (with an appropriate allowance for climate change), or information provided to justify smaller structures. If it is considered the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment (FRA) must be submitted. Our Technical flood risk guidance for stakeholders outlines the information we require to be submitted in an FRA. Please also refer to Controlled Activities Regulations (CAR) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities.

SEPA stated where proposals are on peatland or carbon rich soils the following should be submitted to address the requirements of NPF4 Policy 5:

- a) layout plans showing all permanent and temporary infrastructure, with extent of excavation required, which clearly demonstrates how the mitigation hierarchy outlined in NPF4 has been applied. These plans should be overlaid on:
  - i. peat depth survey (showing peat probe locations, colour coded using distinct colours for each depth category and annotated at a usable scale)
  - ii. peat depth survey showing interpolated peat depths
  - iii. peatland condition mapping
  - iv. National Vegetation Classification survey (NVC) habitat mapping.

- b) an outline Peat Management Plan (PMP).
- c) an outline Habitat Management Plan (HMP)

Detailed advice:

- a) Development design in line with the mitigation hierarchy

SEPA stated in order to protect peatland and limit carbon emissions from carbon rich soils, the submission should demonstrate that proposals:

- Avoid peatland in near natural condition, as this has the lowest greenhouse gas emissions of all peatland condition categories;
- Minimise the total area and volume of peat disturbance. Clearly demonstrate how the infrastructure layout design has targeted areas where carbon rich soils are absent or the shallowest peat reasonably practicable. Avoid peat > 1m depth;
- Minimise impact on local hydrology; and
- Include adequate peat probing information to inform the site layout and demonstrate that the above has been achieved. As a minimum this should follow the requirements of the Peatland Survey – Guidance on Developments on Peatland (2017).

SEPA state The Peatland Condition Assessment photographic guide lists the criteria for each condition category and illustrates how to identify each condition category. This should be used to identify peatland in near natural condition and can be helpful in identifying areas where peatland restoration could be carried out.

SEPA state in line with the requirements of Policy 5d of NPF4, the development proposal should include plans to restore and/or enhance the site into a functioning peatland system capable of achieving carbon sequestration.

b) The outline PMP should also include:

- Information on peatland condition.
- Information demonstrating avoidance and minimisation of peat disturbance.
- Excavation volumes of acrotelmic, catotelmic and amorphous peat. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes.



- Proposals for temporary storage and handling.
- Reuse volumes in different elements of site reinstatement and restoration.

SEPA state handling and temporary storage of peat should be minimised. Catotelmic peat should be kept wet, covered by vegetated turves and re-used in its final location immediately after excavation. It is not suitable for use in verge reinstatement, re-profiling/ landscaping, spreading, mixing with mineral soils or use in bunds.

SEPA state disposal of peat is not acceptable. It should be clearly demonstrated that all peat disturbed by the development can be used in site reinstatement (making good areas which have been disturbed by the development) or peatland restoration (using disturbed peat for habitat restoration or improvement works in areas not directly impacted by the development, which may need to include locations outwith the development boundary).

SEPA state the faces of cut batters, especially in peat over 1m, should be sealed to reduce water loss of the surrounding peat habitats, which will lead to indirect loss of habitat and release of greenhouse gases. This may be achieved by compression of the peat to create an impermeable subsurface barrier, or where slope angle is sufficiently low, by revegetation of the cut surface.

c) SEPA state the outline HMP should include:

- Proposals for reuse of disturbed peat in habitat restoration, if relevant.
- Details of restoration to compensate for the area of peatland habitat directly and indirectly impacted by the development.
- Outline proposals for peatland enhancement in other areas of the site.
- Monitoring proposals.

SEPA state to support the principle of peat reuse in restoration the applicant should demonstrate that they have identified locations where the addition of excavated peat will enhance the wider site into a functional peatland system capable of achieving carbon sequestration. The following information is required:

- Location plan of the proposed peatland re-use restoration area(s), clearly showing the size of individual areas and the total area to be restored.

- Photographs, aerial imagery, or surveys to demonstrate that the area identified is appropriate for peat re-use and can support carbon sequestration. This should include consideration of an appropriate hydrological setting and baseline peatland condition.

SEPA state in addition, if any proposed re-use restoration areas are outwith the ownership of the applicant, information should be provided to demonstrate agreement in principle with the landowner, including agreed timescales for commencement of the works, and proposed management measures to ensure the restored areas can be safeguarded in perpetuity as a peatland.

SEPA state Groundwater Dependent Terrestrial Ecosystems (GWDTE) are protected under the Water Framework Directive. Excavations and other construction works can disrupt groundwater flow and impact on GWDTE and existing groundwater abstractions. The layout and design of the development must avoid impacts on such areas. A National Vegetation Classification survey which includes the following information should be submitted:

- A map demonstrating all GWDTE and existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. The survey needs to extend beyond the site boundary where the distances require it.
- If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice and the minimum information we require to be submitted.

SEPA state if forestry is present on the site, it prefers a site layout which avoids large scale felling as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality. The submission must include a map with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS.

SEPA state the following information should also be submitted for each borrow pit:

- a) A map showing the location, size, depths and dimensions.

- b) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250m. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks.
- c) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.

SEPA state a schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of Ecological Clerk of Works, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to the Guidance for Pollution Prevention (GPPs) and our water run-off from construction sites webpage for more information.

SEPA state proposals for life extension, repowering and/or decommissioning must demonstrate accordance with SEPA Guidance on the life extension and decommissioning of onshore wind farms. Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed.

SEPA state the submission needs to state that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing. Further guidance on this may be found in the document Is it waste - Understanding the definition of waste.

## Transport Scotland

Transport Scotland (TS) state it understands the proposed development to be a new 400kV substation to be constructed to allow the existing network to connect to the 400kV Beauldy-Denny OHL with the nearest trunk road being the A9(T) which is located approximately 8.5km to the southeast at Greenloaning. TS also confirm it notes that the proposals are at the site selection stage, with various Options being considered with Option 2 being SSEN Transmission's preferred option.

TS state it has no comment to make on the individual site options, however it should be noted that in the event that the construction works associated with the substation results in the need for Abnormal Load Deliveries (ALD), TS will require to be satisfied that the size of loads proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.

TS state 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.

In addition, TS state a threshold assessment in accordance with the IEMA Guidelines for the Environmental Assessment of Road Traffic will be required, to determine whether there are likely to be any significant environmental issues associated with increased traffic on the trunk road network, and any requirement for further trunk road assessment. This can be undertaken as part of the planning application process and TS can provide further guidance at the formal scoping stage.

We will ensure adequate consultation with Transport Scotland occurs as required throughout the project.

Environmental assessment will include a traffic and transport assessment to assess the potential effects of the Proposed Development on the local and wider transport network. This assessment and reporting will be submitted as part of a planning application.

The assessment will identify any mitigation measures and commitments to be incorporated in the design, construction and operational phases of the Proposed Development.

## 7.2. Appendix B – Public Consultation Event Postcard Invites



# Beauly – Denny 400kV Upgrade Project New Braco West 400kV Substation

## Public consultation event

### What is happening?

SSEN Transmission is holding a public consultation event to gain views and feedback for part of our Beauly – Denny 400kV upgrade project. For this consultation we will be consulting with the local community and all interested parties and encouraging feedback on our proposals relating to the proposed new Braco West substation which will operate at 400kV.

Our face to face consultation event will give members of the public an opportunity to view our proposals and speak with members of the project team.

This event will be followed by a six week feedback period, during which all stakeholders are invited to provide feedback specific to the proposals at this stage. We would encourage all members of the local community, and all interested parties to attend the event and meet with our project team who will be there to talk through the details of the project and answer any of your questions. **Our consultation period for this project opens on 22 August and will close on 3 October.**

 SSEN Community


 @SSETransmission

[ssen-transmission.co.uk](http://ssen-transmission.co.uk)

Come meet us at the following location and date:

**Braco Hall  
Feddal Rd, Braco, Dunblane  
FK15 9QD**

**22 August 2023  
3:30 - 7:30pm**

 If you have any questions, more information is available on our dedicated project website: <https://bit.ly/3DO1Vkc>

**If you have any questions, please do not hesitate to contact the Community Liaison Manager:**

**Rose Hodgart**  
SSEN Transmission,  
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