

Pre-Application Consultation and Engagement Strategy

For submission to the Energy Consents Unit of the Scottish Government

LT315 Blarghour wind farm 132 kV OHL connection

February 2026



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1. INTRODUCTION AND BACKGROUND

- 1.1.1 Scottish Hydro Electric Transmission plc (the 'prospective Applicant'), operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission), owns, operates and develops the high voltage electricity transmission system in the north of Scotland and remote islands. SSEN Transmission holds a license under the Electricity Act 1989 to develop and maintain an efficient, co-ordinated and economical system of electricity transmission.
- 1.1.2 The prospective Applicant intends to seek consent under Section 37 to the Electricity Act 1989 (as amended) to install and keep installed a 132 kV wood pole overhead line connection between Blarghour Wind Farm situated approximately 7km north west of Inverary, and Creag Dhubh Substation, currently under construction approximately 2.5 km south west of Cladich.
- 1.1.3 In May 2025, the Energy Consents Unit (ECU) published 'Electricity Act 1989 pre-application consultation and engagement guidance for electricity transmission line projects which require Environmental Impact Assessment' (S37 PAC Guidance).¹ This document recommends how ECU would like Transmission Operators to undertake PAC, and in section 3 (page 9), it describes the drafting and submission of a PAC Strategy in alignment with this guidance.

1.2 About the Project

- 1.2.1 SSEN Transmission, operating under licence held by Scottish Hydro Electric Transmission plc, is the electricity transmission licence holder in the north of Scotland and has a duty under Section 9 of the Electricity Act 1989 to '*develop and maintain an efficient, coordinated and economical system of electricity transmission and to facilitate competition in the generation and supply of electricity.*' SSEN Transmission also has obligations to offer non-discriminatory terms for connection to the transmission system, both for new generation and for new sources of electricity demand.
- 1.2.2 As part of these duties, SSEN Transmission is proposing to construct and operate a new 132 kilovolt (kV) single circuit overhead line (OHL) to connect the consented Blarghour Wind Farm (ECU00004754) to the wider electricity network (hereafter referred to as 'the Proposed Development'). The Proposed Development will extend approximately 11 km and be comprised of Trident 'H' poles. The OHL will connect from the proposed substation within Blarghour Wind Farm to the Creag Dhubh Substation (22/00782/PP), which is currently under construction.
- 1.2.3 SSEN Transmission originally began an optioneering exercise for the wind farm connection in 2021, and held consultation events in May 2022 and August 2023 as route options were refined. A Scoping Opinion was also requested for the previous connection option in January 2024.
- 1.2.4 Since the receipt of the Scoping Opinion in June 2024, as a result of further environmental and technical studies, the previous connection option is no longer preferred and route optioneering is being revisited. Therefore, a new programme of consultation and engagement is being proposed.
- 1.2.5 To reflect this new phase of the Proposed Development, a Notification of Project Establishment was issued to the ECU on Monday 26 January 2026.

1.3 EIA Development Status

- 1.3.1 Compliance with the ECU's S37 PAC Guidance is only required for proposals for EIA Development.
- 1.3.2 The Proposed Development is not covered under the developments listed within Schedule 1 of the EIA Regulations. It is, however, considered that the Proposed Development can be classified as Schedule 2, under the terms of regulation 2(a) of the EIA Regulations: an electric line installed above ground, with a voltage of 132 kV or more.

¹ See [Electricity Act 1989 pre-application consultation and engagement guidance for electricity transmission line projects which require Environmental Impact Assessment](#) (May 2025)

- 1.3.3 A Screening Opinion was previously sought by SSEN Transmission for a former iteration of the Proposed Development as it falls within Schedule 2 of EIA Regulations (ECU Ref: ECU00004854). A response was received on 17th November 2023 detailing:

“The Scottish Ministers have taken into account the selection criteria, all of the information submitted in respect of the request for a screening opinion as well as the views of Argyll and Bute Council, NatureScot and SEPA and adopt the opinion that the Proposed Development does constitute EIA development and any forthcoming application for consent (under section 37 of the Electricity Act 1989) will require to be accompanied by a full Environmental Impact Assessment report.”

- 1.3.4 Contributing factors provided in support of the decision were as follows:
- The nature of the development in combination with the environmental sensitivities present is likely to give rise to significant environmental effects. It is unlikely to have significant impact on population and human health, through applied mitigation but likely impact on biodiversity, potentially on protected species included within the Glen Etive and Glen Fyne SPA and on peatlands.
 - Scottish ministers share the concern of Argyll and Bute Council regarding potential significant effect on the North Argyll APQ, with the possible use of steel lattice towers up to 40 m in height along with the cumulative impacts of other proposed infrastructure, the potential impacts on class 2 peatland and potential impacts on ornithology including qualifying criteria of The Glen Etive and Glen Fyne SPA.
 - The Scottish ministers having considered the information contained within the screening request, responses provided by NatureScot, SEPA and Argyll and Bute Council conclude that the effects of the Proposed Development are likely.
- 1.3.5 Although the route of the OHL differs slightly, and the technology choice has been confirmed to be predominantly trident “h” wood pole rather than steel lattice, the likelihood of potential cumulative effects, and impacts to biodiversity remain. As such, the Proposed Development is being progressed as EIA development.

1.4 PAC Notice

- 1.4.1 We intend to submit a PAC Notice to the ECU, Argyll and Bute Council, Local MP and MSPs, local councillors, and Inverary Community Council, as required by the S37 PAC Guidance. We will undertake this as soon as the project ECU reference number is confirmed.
- 1.4.2 This will be uploaded to the project website for reference, and it will be attached to the PAC Report.

1.5 SSEN Contact Details

Caitlin Marini
Email: Caitlin.Marini@sse.com
Mobile: 07901 135758

1.6 Technical experts

- 1.6.1 Technical experts will be available to answer questions at each of the PAC Events across both stages, and will be available to respond to written questions received online through the online consultation portal as required. Normally, we will have the following core team of technical experts available to answer questions at PAC events, among others: Community Liaison Manager, Project Manager, Land Manager, Engineer, and a Consents and Environment Manager.
- 1.6.2 Where it is not possible to answer a question from an attendee at an event, the project team will be able to record a question and contact details in order to respond at a later date.

1.7 Recording of Comments

- 1.7.1 Any information or feedback given during the consultation process, through direct feedback, the use of consultation forms provided at PAC events or via the online feedback forms, will be recorded in a comments register by the project

team for the purposes of providing feedback in reports on consultation and at later events. They will also be used to inform the contents of the Pre-Application Consultation Report (PAC Report) that will be submitted with the application.

1.8 Information to be made available online

1.8.1 The following information will be made available online on the project website:

- PAC Strategy and appendices, once approved. We will upload updated versions of this document as necessary
- PAC Notice

1.8.2 The project website will be updated to include up to date information as the project develops. Our project webpages contain tabs with the following headings:

- Overview – to include information on the need for the project and how it has been identified.
- Project updates – to include information on when consultation will be taking place, how to access the online consultation portal, and submit feedback
- Documents – as consultation materials are developed and the PAC events are held we will also use the project websites to host digital versions of our consultation materials, including information on potential environmental effects
- FAQs – this currently links to a webpage containing a series of answers prepared for FAQs: <https://www.ssen-transmission.co.uk/2030faqs>

1.8.3 This will include information on the need for the project and how it has been identified. As consultation materials are developed and the PAC events are held we will also use the project websites to host digital versions of our consultation materials, including information on potential environmental effects, and how to access the online consultation portal, and submit feedback.

2. STAGE 1: DEFINITION OF THE PROPOSED ROUTE

2.1 What will be consulted upon in Stage 1

- 2.1.1 During Stage 1, we intend to undertake one PAC event to provide information on the need for the project, routing constraints, technology options and issues that need to be taken into account in developing the proposed route.
- 2.1.2 We will seek specific feedback on all potential route options. This will include an initially proposed least constrained route along with other route options. We will seek views on the relevant local issues that will help to inform the decision making relating to the development of any proposed route following assessment of technical constraints and any feedback given.

2.2 PAC Event 1

- 2.2.1 We intend to hold the PAC Event for Stage 1 at the following dates and locations

| <i>Date</i> | <i>Location</i> |
|------------------------|---|
| Thursday 5 March, 2026 | Loch Fyne Hotel, Shore Street, Inveraray PA32 8XT |

- 2.2.2 The hours of the event will be 2 – 7pm.
- 2.2.3 Given the relatively short length of the proposed routes, we do not currently envisage that duplicate events are required however we may review this position if feedback received indicates that further events are necessary.
- 2.2.4 The venue can be reached by car and has a car park and disabled parking. The venue can be reached via local public transport and is very close to the main town centre of Inveraray. The venue itself is wheelchair accessible. There are no stairs at the entrance to the venue nor to the room that SSEN Transmission will host the event in.

2.3 Publicity

- 2.3.1 We intend to publish an advert publicising the event(s) in the Oban Times and the Argyll Advertiser at least 21 days prior to the PAC event in Stage 1, containing the information required on page 19 of the S37 PAC Guidance.
- 2.3.2 We will also undertake a mail drop to properties along the route and will typically mail properties within a defined distance of our developments ahead of all of our events in any case. We will, in addition, advertise on our social media channel and directly contact interested parties who have attended previous events that we have held outwith the formal PAC process. We will also directly contact anyone who has signed up for project updates on our website.
- 2.3.3 We will retain a copy of this advert and any other publicity materials to attach to the PAC Report.

2.4 Online consultation

- 2.4.1 A virtual version of the event will be accessible online via the project webpage from the date of the in-person PAC event with information on how to submit comments electronically, by post and in person. Information on how feedback will be provided will also be included.

2.5 Feedback period for comments

- 2.5.1 Following the event(s), we confirm that the feedback period will be open for a minimum of 28 days, meaning the feedback period will close on 7 April 2026.
- 2.5.2 Comments will be recorded at the event and those attending will be given the opportunity to take materials away and to comment in private via email or in writing. There will also be opportunity to comment via the dedicated online consultation portal.

2.6 Report on Consultation

- 2.6.1 A report on consultation outlining the feedback from PAC event 1 will be made available via the project website online in May, 2026.

3. STAGE 2: DEFINITION OF THE ALIGNMENT

3.1 What will be consulted upon in Stage 2

- 3.1.1 Stage 2 will consult on detailed alignment considerations that will help inform the final alignment. In the events we will seek specific feedback on the proposed alignment and the location of structures and construction arrangements.
- 3.1.2 Any alignment will be informed by EIA survey information and studies that will feed into the EIA Report that would accompany any application submitted to the ECU.

3.2 PAC Event 2

- 3.2.1 We intend to hold the PAC Event for Stage 2 at the following dates and locations

| <i>Date</i> | <i>Location</i> |
|--------------------------------|---|
| Target Date Thurs 4 June, 2026 | Loch Fyne Hotel, Shore Street, Inveraray PA32 8XT |

- 3.2.2 The hours of the event will be 2 – 7pm.
- 3.2.3 Given the relatively short length of the proposed alignment, we do not currently envisage that duplicate events are required however we may review this position if feedback received indicates that further events are necessary.
- 3.2.4 The Loch Fyne Hotel can be reached by car and has a car park and disabled parking. The venue can be reached via local public transport and is very close to the main town centre of Inveraray. The venue itself is wheelchair accessible. There are no stairs at the entrance to the venue nor to the room that SSEN Transmission will host the event in.

3.3 Publicity

- 3.3.1 We intend to publish an advert publicising the event(s) in Oban Times and the Argyll Advertiser at least 21 days prior to PAC event in Stage 2, containing the information required on page 19 of the S37 PAC Guidance.
- 3.3.2 We will also undertake a mail drop to properties along the route and will typically mail properties within a defined distance of our developments ahead of all of our events in any case. We will, in addition, advertise on our social media channel and directly contact interested parties who have attended previous events that we have held outwith the formal PAC process. We will also directly contact anyone who has signed up for project updates on our website.
- 3.3.3 We will retain a copy of this advert and any other publicity materials to attach to the PAC Report.

3.4 Online consultation

- 3.4.1 A virtual version of the event will be accessible online via the project webpage from the date of the in-person PAC event with information on how to submit comments electronically, by post and in person. Information on how feedback will be provided will also be included.

3.5 Feedback period for comments

- 3.5.1 Following the event(s), we confirm that the feedback period will be open for a minimum of 28 days.

The consultation period will be timed to avoid an overlap with the local school summer holidays. If there are delays to the project programme that might delay the consultation period, it will be moved to later in the year to avoid the school summer holidays.

3.5.2 Comments will be recorded at the event and those attending will be given the opportunity to take materials away and to comment in private via email or in writing. There will also be opportunity to comment via the dedicated online consultation portal.

3.6 Report on Consultation

3.6.1 A report on consultation outlining the feedback from PAC event 1 will be made available via the project website online in August, 2026.

4. CONCLUSIONS AND NEXT STEPS

4.1 PAC Strategy Approval and Future Amendments

- 4.1.1 The S37 PAC Guidance explains that, following submission, ECU will review and approve the proposed PAC Strategy within three weeks, or, if any modifications are sought to the PAC Strategy to ensure compliance with this guidance by the ECU these will be communicated within 2 weeks following submission. We look forward to feedback from ECU in either case.
- 4.1.2 This PAC Strategy is intended to be a live document should amendments be required. Any subsequent amendments to the PAC Strategy will be agreed with the ECU case officer in writing. This document, once approved, and any future revised versions, will be published on the project website in due course.

4.2 PAC Report

- 4.2.1 Having carried out the PAC contained in this document, we also commit to submitting with the application for S37 consent a PAC Report with the contents prescribed on pages 19-20 of the S37 PAC Guidance.