

File Note

LT382; response to comments from Angus Council's Countryside Officer

Sender	Recipient(s)
Hywel Roberts	Chris Gardner
Project Number	Date/Time
12371	23 rd June 2025

Dear Chris,

Further to the comments made by Angus Council's Countryside Officer in relation to the submitted Landscape & Visual Impact Assessment and Residential Visual Amenity Assessment for the proposed Emmock Substation, please find within this file note a response which replies to the issues that have been raised.

Overall, we would comment that it is unclear as to whether a response to these points has been requested of the Applicant and whether it would be beneficial to the Case Officer to do so. The Countryside Officer disagrees with some conclusions that we have drawn but provides limited information for why an alternative conclusion has been reached and we would be happy to have further discussions should SSEN and Angus Council think this to be of value. We have responded to each of the main points raised below in turn, although it is noted that in general the overall determination of whether a significant effect will occur has not been disputed.

Dipslope Farmland LCT and Lowland Hill Ranges LCT

It is noted that the Countryside Officer accepts the conclusions of the assessment upon these Landscape Character Types although we note the comments with regard to the inclusion of the Sidlaw LLA within these LCTs.

Sidlaw LLA

LUC's assessment states that there are no LLAs within the study area which is incorrect although there are many references within the assessment to the proposed LLA which is no different in area to that eventually adopted. The LLA has therefore been treated with the same value as if it were adopted. We welcome the comments from the Countryside Officer and confirmation that VP1 helps to assess the impacts from the LLA and that it is agreed that the Proposed Development would be unlikely to detract significantly from the wider panoramic viewpoints from this VP.

Visual Effects

The methodology within Appendix 7.1 explains that minor effects in the assessment "can include large scale effect which is confined in its geographic extent". In response to the point that this novel approach has often led to an under-assessment of effects, the approach is in fact recommended in Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3) and considered good practice, for example in paragraph 6.38 on page 115 of GLVIA3 which states "*Each of the visual effects identified needs to be evaluated in terms of its size or scale, the geographical extent of the area influenced, and its duration and reversibility*".

In regard to Table 7.30 VP1 and what tree heights have been used in the photo-montage modelling, and also what the predicated tree heights are based on, this was based on trees being around 10-12m tall 10 years after being planted.

LUC agrees that the mitigation planting may, from some VPs, take longer to achieve that what is presented, however we consider the assumptions made are reasonable and these are not over-optimistic rates of growth.

Construction Phase

In regard to the comment that the assessment typically under-assesses both sensitivity and magnitude of effects, it is not clear which assessment this refers to and we would therefore suggest that the specific assessments are identified.

Operational effects on views

Whilst it is noted that the Countryside Officer considers that the magnitude of effects is under-estimated for the majority of viewpoints, we still believe the assumptions made are reasonable and we would be happy to discuss with the Countryside Officer why we believe this is the case.

Cumulative Landscape & Visual Effects

With regard to the mitigation options, this would require off-site works that is not within the control of the Applicant and therefore cannot be delivered through the planning application for the proposed Emmock substation.

Residential Visual Amenity Assessment

LUC does not consider that the impacts at P1 and P2 at Balkemback are understated as it has been suggested and we do not agree that there are limitations to the criteria that have been used. Without discussing these points with the Countryside Officer there is limited benefit to responding as we believe that it would be necessary to explain our approach to the RVA assessment that has been undertaken.