Volume 4: Appendix 6.2 – Scoping Opinion

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The Scottish Government
Energy Consents Unit

Scoping Opinion on behalf of Scottish Ministers under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Emmock and Tealing Overhead Line Tie-Ins
Scottish Hydro Electric Transmission plc

28 May 2025

CONTENTS

1. Introduction

1.1 This scoping opinion is issued by the Scottish Government Energy Consents Unit on behalf of the Scottish Ministers to Scottish Hydro Electric Transmission plc a company incorporated under the Companies Acts with company number SC213461 and having its registered office at Inveralmond House, 200 Dunkeld Road, Perth, PH1 3AQ ("the Company") in response to a request dated 11 April 2025 for a scoping opinion under the Electricity Works (Environmental Impact Assessment)
(Scotland) Regulations 2017 in relation to the proposed Emmock and Tealing Overhead Line Tie-Ins ("the proposed Development"). The request was accompanied by a scoping report.

1.2 The proposed Development would be located on and near to the existing Alyth to Tealing and Westfield to Tealing Overhead Line ("OHL") and the existing Tealing substation, approximately 5 km north of Dundee as illustrated in Figure 1.1: Location Plan of the Scoping Report.

1.3 The proposed Development would comprise:

- Installation of a new section of Alyth - Tealing 400 kV OHL including seven new towers from the location of Tower AT2 southwards for a distance of approximately 2,200 m to connect with the northern side of the platform of the separately proposed Emmock substation;
- Dismantling of 11 towers over a distance of approximately 3.5 km and grubbing up of tower foundations from Tower AT2 to the current connection at Tealing Substation;
- Construction of temporary tower ATT1 to maintain transmission on the Alyth – Tealing OHL while the existing tower adjacent to AT3 is removed;
- Installation of a new section of Westfield - Tealing OHL, comprising two new towers, WT10 and WT11, northwards for a distance of approximately 150 m to connect with the southern side of the platform of the proposed Emmock substation;
- construction of a temporary tower diversion, consisting of two new towers, WTT1 and WTT2, to maintain transmission on the Westfield - Tealing OHL; and
- Installation of two new tie-back connections between Emmock and Tealing substations, the East TT and West TT, with the East-TT requiring installation of 4 new towers, TE1, TE2, TE3, and TEG1, and upgrading of existing end point tower TE4 currently connected to Tealing Substation; and the West TT requiring installation of towers TW1 and gantry TWG1 and upgrading of existing towers WT9, TW2, TW3 and TW4.

1.4 The main construction activities would include:

- Establishment of temporary construction compounds;
- Preparation of accesses including bellmouths (at public road junctions) and access tracks to allow transport of plant and materials to each tower position (for tower demolition or tower erection and conductor stringing);
- preparation of temporary working areas including excavations and construction of tower foundations;

- Delivery of structures and materials to site, assembly and erection of towers in locations of new sections of OHL;
- Tower/pole conductor ‘stringing’ and commissioning of the new sections of diverted OHL;
- Demolition of towers to be removed from the redundant sections of OHLs into Tealing Substation and removal of tower components for re-use/recycling;
- Removal of temporary infrastructure and reinstatement of vegetation around construction areas and in locations where temporary access tracks are removed; and
- Demobilisation and reinstatement of areas used for temporary compounds.

1.5 It is indicated the proposed Development would not have a fixed operation life. If the proposed Development was to be decommissioned the site would be restored in accordance with an agreed decommissioning plan.

1.6 The proposed Development is solely within the planning authority of Angus Council.

2. Consultation

2.1 Following the scoping opinion request a list of consultees was agreed between Scottish Hydro Electric Transmission plc and the Energy Consents Unit. A consultation on the scoping report was undertaken by the Scottish Ministers and this commenced on 17 April 2025. The consultation closed on 13 May 2025. The Scottish Ministers also requested responses from their internal advisors Transport Scotland and Scottish Forestry. Standing advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD) has been provided with requirements to complete a checklist prior to the submission of the application for consent under section 37 of the Electricity Act 1989. All consultation responses received, and the standing advice from MD-SEDD, are attached in ***ANNEX A Consultation responses*** and ***ANNEX B MD-SEDD Standing Advice.***

2.2 The purpose of the consultation was to obtain scoping advice from each consultee on environmental matters within their remit. Responses from consultees and advisors, including the standing advice from MD-SEDD, should be read in full for detailed requirements and for comprehensive guidance, advice and, where appropriate, templates for preparation of the Environmental Impact Assessment (EIA) report.

2.3 Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisors.

2.4 The following organisations were consulted but did not provide a response: Civil Aviation Authority, Fisheries Trust Scotland - Tay Foundation, John Muir Trust, RSPB Scotland, Scottish Rights of Way and Access Society (Scotways), Scottish Wildlife Trust, Tay District Salmon Fisheries Board, Health and Safety Executive, National Grid, National Gas Transmission, Scottish Fire and Rescue Service, Scottish Forestry and Tealing Community Council.

2.5 With regard to those consultees who did not respond, it is assumed that they have no comment to make on the scoping report, however each would be consulted again in the event that an application for section 37 consent is submitted subsequent to this EIA scoping opinion.

2.6 The Scottish Ministers are satisfied that the requirements for consultation set out in Regulation 12(4) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 have been met.

3. The Scoping Opinion

3.1 This scoping opinion has been adopted following consultation with Angus Council, within whose area the proposed Development would be situated, NatureScot (previously "SNH"), Scottish Environment Protection Agency and Historic Environment Scotland, all as statutory consultation bodies, and with other bodies which Scottish Ministers consider likely to have an interest in the proposed Development by reason of their specific environmental responsibilities or local and regional competencies.

3.2 Scottish Ministers adopt this scoping opinion having taken into account the information provided by the applicant in its request dated 11 April 2025 in respect of the specific characteristics of the proposed Development and responses received to the consultation undertaken. In providing this scoping opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific characteristics of the proposed Development, the specific characteristics of that type of development and the environmental features likely to be affected.

3.3 A copy of this scoping opinion has been sent to Angus Council for publication on their website. It has also been published on the Scottish Government energy consents website at www.energyconsents.scot.

3.4 Scottish Ministers expect the EIA report which will accompany the application for the proposed Development to consider in full all consultation responses attached in **Annex A and Annex B**.

3.5 Scottish Ministers are satisfied with the scope of the EIA set out at Sections 5 to 11 of the scoping report.

3.6 In addition to the consultation responses, Ministers wish to provide comments with regards to the scope of the EIA report. The Company should note and address each matter.

3.7 Scottish Water have indicated some of the activity for the proposed Development will likely fall within a Drinking Water Protection Area and have requested shapefiles from the company in order to provide a full assessment. The Scottish Ministers request the company to continue its engagement with Scottish Water ensuring the required information is provided. Scottish Ministers also request that the company further contacts Scottish Water (via EIA@scottishwater.co.uk) and makes enquires to confirm Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.

3.8 Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided. SEPA advise that impacts on Groundwater Abstractions including that of Private Water Supplies should not be scoped out of the EIA until further information is available and refer to Appendix 1 of its response. The Scottish Ministers would agree with this advice.

3.9 SEPA further advise that justification should be included for the Scoping out of impacts on peat as well as Ground Water Dependant Terrestrial Ecosystems ("GWDTE"). It requests the inclusion of relevant soil maps for peat and mapped survey results for GWDTE. Scottish Ministers agree with this position.

3.10 Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provide generic scoping guidelines for overhead line development https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren) which outline how fish populations can be impacted during the construction, operation and decommissioning of overhead line developments and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

3.11 In addition to identifying the main watercourses and waterbodies within and downstream of the proposed Development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.

3.12 MD-SEDD also provide standing advice for overhead line development (which has been appended at Annex B) which outlines what information, relating to freshwater and diadromous fish and fisheries, is expected in the EIA report. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process. Developers are required to submit the completed checklist in advance of their application submission.

3.13 Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled

by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at http://www.gov.scot/Publications/2017/04/8868, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.

3.14 The scoping report identified viewpoints at Table 5.2 to be assessed within the landscape and visual impact assessment and it is noted that the list of representative viewpoints will be discussed and agreed with Angus Council and NatureScot.

3.15 Angus Council request that a detailed assessment of operational noise including cumulative noise with other OHL developments be included within an EIA. The Scottish Ministers would agree for the inclusion of this noise assessment.

3.16 Angus Council also request that considerations of alternatives including that of undergrounding the connections between the existing substation at Tealing and the proposed substation at Emmock be included within the EIA.

3.17 It is recommended by the Scottish Ministers that decisions on bird surveys – species, methodology, vantage points, viewsheds & duration - site specific & cumulative – should be made following discussion between the Company and NatureScot.

3.18 The Scottish Ministers request that the company assess the impact of the proposed Development on existing and/or planned infrastructure. In particular, the company should carry out the necessary assessments to confirm if any part of the proposed Development is within the consultation zone of any of the following:-

- a licenced explosives site;
- gas (or any other) pipeline;
- existing overhead electric lines;
- underground cables;
- water pipes;
- telecommunications links.

3.19 Scottish Ministers request the company to assess if any flammable, toxic or explosive chemicals detailed in The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015 would be stored on site in quantities such that a Hazardous Substances Consent would be required under section 2 of the Planning (Hazardous Substances) (Scotland) Act 1997.

3.20 Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed Development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.

4. Mitigation Measures

4.1 The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed Development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.

5. Conclusion

5.1 This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at the date of this scoping opinion. The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 37 consent for the proposed Development.

5.2 This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.

5.3 Without prejudice to that generality, it is recommended that advice regarding the requirement for an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.

5.4 It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed Developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed Development will be required, and would request that they are kept informed of on-going discussions in relation to this.

5.5 Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit at the pre-application stage and before proposals reach design freeze.

5.6 When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.

5.7 It should be noted that to facilitate uploading to the Energy Consents portal, the EIA report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes (MB).

Lee Stirrat

Energy Consents Unit
28 May 2025

ANNEX A

Consultation

List of consultees who provided a response.

- Angus Council
- Historic Environment Scotland
- NatureScot (previously “SNH”)
- Scottish Environmental Protection Agency
- British Horse Society
- BT
- Defence Infrastructure Organisation
- Highland and Islands Airports Limited
- Joint Radio Company Limited
- NATS Safeguarding
- Network Rail
- Scottish Gas Networks (SGN)
- Transport Scotland

Internal advice from areas of the Scottish Government was provided by officials from Transport Scotland and Marine Directorate (in the form of standing advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD or bespoke advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD).

See Section 2.4 above for a list of organisations that were consulted but did not provide a response.

Your Ref: EC00005204
Our Ref: 25/00211/EIASCO

14 May 2025

Joyce Melrose
Admin Officer
Energy Consents Unit

By email only to: Econsents_Admin@gov.scot

Chief Executive
Kathryn Lindsay

Dear Joyce

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

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR PROPOSED SECTION 37 APPLICATION FOR EMMOCK AND TEALING OHL TIE-INS

I write in response to your email of 17 April 2025 in respect of a request for Scoping Opinion in relation to the above proposal which would come forward as a Section 37 application to Scottish Ministers.

Appendix 1 to this letter forms Angus Council's comments on the Scoping Opinion request, and copies of the internal consultee comments are provided at Appendix 2.

I trust that this is in order. Should you have any queries, please do not hesitate to contact me on 01307 492533 or email TaylorE@angus.gov.uk.

Yours sincerely

Ed Taylor
Team Leader – Development Standards, Angus Council

Appendix 1: Angus Council response to scoping consultation
Appendix 2: Consultation responses on scope of EIA Report

Appendix 1: Angus Council Response to Scoping Consultation

1. The Applicant is proposing to submit an application for consent under section 37 of the Electricity Act 1989 for works involving:

    - installation of a new section of Alyth - Tealing 400 kV OHL including seven new towers from the location of Tower AT2 southwards for a distance of approximately 2,200 m to connect with the northern side of the platform of the proposed Emmock substation;
    - dismantling of 11 towers over a distance of approximately 3.5 km and grubbing up of tower foundations from Tower AT2 to the current connection at Tealing Substation;
    - construction of a temporary tower ATT1 to maintain transmission on the Alyth - Tealing OHL while the existing tower adjacent to AT3 is removed;
    - installation of a new section of Westfield - Tealing OHL, comprising two new towers, WT10 and WT11, northwards for a distance of approximately 150 m to connect with the southern side of the platform of the proposed Emmock substation; and
    - construction of a temporary tower diversion, consisting of two new towers, WTT1 and WTT2, to maintain transmission on the Westfield - Tealing OHL.
    - Installation of two new tie-back connections between Emmock and Tealing substations, the East TT and West TT, with the East-TT requiring installation of 4 new towers, TE1, TE2, TE3, and TEG1, and upgrading of existing end point tower TE4 currently connected to Tealing Substation; and the West TT requiring installation of towers TW1 and gantry TWG1 and upgrading of existing towers WT9, TW2, TW3 and TW4.

2. The Environmental Impact Assessment (EIA) Scoping Report relates to the works described above only, and separate applications under either Section 37 of the Electricity Act or the Town and Country Planning (Scotland) Act for the installation and operation of a new 400kv OHL or upgrades to existing lines, and for the new substation at Emmock will be (or have been) submitted to the appropriate decision making bodies.

3. Council officers are largely satisfied with the scope of the EIA Report, which focusses on predicted significant environmental effects associated with the project. Officers note the topics which are identified to be scoped in and scoped out of the assessment (Table 12.1), and further comment on the identified topics and the associated methodology is provided below, which has regard to the internal consultation carried out by Angus Council on the Scoping Report prepared by the applicant.

4. The proposed structure of the EIA Report is set out at 1.5. It is noted that the EIA Report (Chapter 2) will include a detailed explanation of the need for the project. It is understood that there is no reference in the scoping report to consideration of alternatives. In relation to that matter, Angus Council requests that the report includes consideration of the potential for the connections between the existing substation at Tealing and proposed substation at Emmock to be undergrounded to reduce the amount of OHL clutter in and around the substations (existing and proposed).

5. Chapter 4 deals with topics **scoped out** of the assessment. Comments from the council's access officer are provided in the appendix. They are satisfied that land use and recreation can be scoped out but note that Core Path 207 (Kirkton of Tealing to Balnuith) is less than 50 metres from the proposed line and immediately below a section of line proposed for removal. They note the potential for short-term disruption to the core path during the construction phase, and suggest this should be considered at the planning application stage (but are content for this to be outside of the EIA process).

6. It is noted that significant effects are not anticipated in relation to traffic and transport. A transport statement would be submitted outside of the EIA Report to consider those matters. That approach is considered to be acceptable and it is agreed that traffic and transport can be scoped out of the EIA report and dealt with separately. The approach has been discussed with the council's roads service. Their comments on the proposal have been delayed but will be shared under separate cover when available.

7. Chapter 5 deals with landscape and visual assessment and the scope of the LVIA is summarised at Table 5.1. Impacts on the Sidlaw Hills LLA are scoped-in to the assessment and representative viewpoints will be agreed with Angus Council. It is proposed that RVAA will be considered for residential property within 500m of the development and it is indicated that those at a greater distance than 500m will not be assessed by RVAA. While the proposed 500m distance may be sufficient for properties close to the development, there are a number which may be close to but beyond this threshold, but worthy of inclusion in the RVAA process. Reference is made to the approach to RVAA discussed as part of the new Kintore to Tealing 400kv OHL where inclusion in the assessment is to be based on a case-by-case approach to determine the potential for the residential amenity threshold to be breached by the presence of the proposed development and a similar approach should be considered. The scope of LVIA is otherwise considered to be appropriate.

8. Chapter 6 deals with cultural heritage and archaeology. It is noted that matters relating to World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas are within the remit of Historic Environment Scotland. In relation to the matters within the remit of Angus Council including unscheduled archaeology, category B and C listed buildings, and conservation areas the council is generally satisfied by the scope of the assessment. Comment from Angus Council's archaeological advisor is provided at Appendix 2.

9. Chapters 7 and 8 deal with ecology and ornithology, respectively. It is understood that NatureScot will comment on statutory protected areas, birds in the wider countryside, peatland and carbon-rich soils and protected species (not birds). In relation to ecology, the council's environment team is content with the proposed approach to assessing the potential effects of the proposed development on ecology. They are satisfied that the survey methodology is adequate for generating sufficient ecological baseline information, and agree with the overview of ecological conditions in the study area. They indicate however, that adjacent heathland and acid grassland at Bakello and Balluderon Hills is considered ***locally rare*** in Angus and has not been referenced. This area is located to the west of the proposed development and includes existing tower AT1. They indicate that this area was surveyed by Scottish Wildlife Trust in 1993 and has been identified for consideration for future designation as a Local Nature Conservation Site (LNCS), but acknowledge the impact on this land will be negligible due to the use of the pre-existing tower.

10. Insofar as it relates to matters within the remit of Angus Council, the environment team is content with the proposed approach to assessing the likely significant effects on ornithology, and the survey approach regarding qualifying features of designated sites and other protected bird species within the study area. The ornithological receptors identified and mitigation measures are considered appropriate.

11. Chapter 9 deals with hydrology and hydrogeology and the matters proposed to be scoped out are listed at 9.9. It is understood that SEPA advice will cover a number of matters relating to hydrology and hydrogeology. In relation to private water supplies, environmental health notes that an assessment of impacts on private water supplies during the construction phase is proposed and will inform the mitigation, if any, that is required to prevent any contamination or interruption of these supplies. Angus Council is satisfied that assessment can be cover through application submissions outside of the EIA process.

12. Chapter 10 relates to noise and vibration. Potential significant effects from noise and vibration are predicated during the construction phase, but no significant effects are predicted from operational noise or vibration and those matters are proposed to be scoped out of the EIA Report. Comments from environmental health are included within the appendix. In terms of operational noise it indicates that the scoping report does not provide sufficient detail to be satisfied that all potential operational noise impacts affecting receptors (including cumulative noise with other OHL developments) have been fully assessed and it suggests that a detailed assessment should be **scoped in** to the EIA Report.

13. Chapter 11 deals with cumulative effects and Tables 11.1 and 11.2 list major and foreseeable developments. An up to date check of the status of projects can be provided prior to submission and the shortlist should include Myreton Farm - (ECU00005053). Balnuith BESS – consented (ECU00004887), Fithie BESS - screening (ECU00005034), 17 Acres BESS – screening (ECU00005170). Consideration to shortlisting should also be given to the recently submitted Pitpointie solar proposal - application (25/00250/FULM) which is around 3km west of the site.

Appendix 2 – Consultation responses on scoping

Consultee	Response provided	Date of response
Environmental health (amenity)	yes	22 April 2025
Environmental health (contaminated land)	yes	22 April 2025
Roads (traffic)	Response will be shared when available	TBC
Roads (flooding/drainage)	No	
Landscape Advisor	Verbal feedback incorporated into comments in Appendix 1.	13 May 2025
Archaeology	yes	28 April 2025
Environment team	yes	6 May 2025
Access officer	yes	6 May 2025

Annex A6

Ed Taylor

From: Iain H Graham
Sent: 22 April 2025 16:01
To: Ed Taylor
Cc: Martin Petrie
Subject: RE: 25/00211/EIASCO – Consultation on content of EIA Report (Scoping) for EMMOCK AND TEALING OHL TIE-INS

Hi Ed

Thank you for allowing Environmental Health the opportunity to comment on the EIA Scoping Report for the above project.

In terms of matters of interest to this Service I note that an assessment of impacts on private water supplies during the construction phase is proposed and will inform the mitigation, if any, that is required to prevent any contamination or interruption of these supplies. With regards to noise I note that the Scoping Report states that a full noise impact assessment will be performed for construction noise associated with the proposed development which is welcomed by this Service. In terms of operational noise it appears that an assessment has already been undertaken which concludes that no significant impacts at noise sensitive receptors are predicted and operational noise can be scoped out. However the scoping report does not provide sufficient detail for this Service to be satisfied that all potential operational noise impacts affecting receptors shared with other OHL developments have been fully assessed therefore a detailed assessment should be included in the EIA.

I trust that you find the above to be helpful but if you wish to discuss anything further please do not hesitate to contact me.

Regards

Iain

Iain Graham | **Environmental Health Officer** | Angus Council - Place | Housing, Regulatory and Protective Services | Angus House, Orchardbank Business Park, Forfar, DD8 1AN | ☎07342 076886

Annex A7

Ed Taylor

From: Alan J Milne
Sent: 22 April 2025 13:47
To: Ed Taylor
Cc: Martin Petrie
Subject: RE: 25/00211/EIASCO – Consultation on content of EIA Report (Scoping) for EMMOCK AND TEALING OHL TIE-INS

Hi Ed,

I have reviewed the attached Scoping Report and the associated linked additional information. Regarding the proposals and any risk from land contamination, I draw particular attention to Section 4.1.2, page 28 of the Scoping Report. Table 4.1 details the topics that have been scoped out of the EIAR and these include risk from mobilisation of contaminants in soil. The development is predominately within an area currently agricultural in nature with exception to the southeast end tying into the distribution sub-station.

I confirm my agreement with this conclusion and that no further risk assessment is required for land contamination.

Regards

Alan

Alan Milne, Environmental Protection Officer (EP Unit), **Angus Council**, **Environmental Health**, Angus House, Orchardbank Business Park, Orchard Loan, FORFAR DD8 1AN Telephone: **01307 492287**

Ed Taylor

From: Claire Herbert <claire.herbert@aberdeenshire.gov.uk>
Sent: 28 April 2025 16:49
To: Ed Taylor
Subject: RE: 25/00211/EIASCO – Consultation on content of EIA Report (Scoping) for EMMOCK AND TEALING OHL TIE-INS

Dear Ed,

Thank you for consulting us on the above EIA Scoping application. Having reviewed the submitted information and the site, with particular reference to chapter 6 of the EIA Scoping Report (Cultural Heritage and Archaeology), I include below my answers to the Scoping Questions laid out in the Executive Summary:

1. What environmental information do you hold or are aware of that will assist in the EIA described here for the Proposed Development?
Nothing beyond the sources already listed in chapter 6 of the EIA Scoping Report
2. Do you agree with the proposed approach for collection of baseline data, and that the range of surveys across particular topics is sufficient and appropriate to inform the assessment of environmental effects?
Yes, in respect of Cultural Heritage matters
3. Is there any other relevant existing baseline data that should be taken into account?
No
4. Are there any key issues or possible effects which have been omitted?
No
5. Do you agree with the list of issues to be scoped out, and the rationale behind the decision?
Yes, in respect of Cultural Heritage matters

Kind regards,
Claire

Claire Herbert MA(Hons) MA MCIfA

Archaeologist
Archaeology Service, Historic Environment Team, Planning and Economy
Environment and Infrastructure Services
Aberdeenshire Council

E: Claire.herbert@aberdeenshire.gov.uk
W: https://www.aberdeenshire.gov.uk/leisure-sport-and-culture/archaeology
Search the Historic Environment Record: https://online.aberdeenshire.gov.uk/smrpub

Archaeology Service for Aberdeenshire, Moray, Angus & Aberdeen City Councils

Ed Taylor

From: Anna Cowie
Sent: 06 May 2025 10:44
To: Ed Taylor
Cc: Kelly Ann Dempsey
Subject: RE: 25/00211/EIASCO – Consultation on content of EIA Report (Scoping) for EMMOCK AND TEALING OHL TIE-INS

Good morning,

Thank you for the opportunity to comment on **25/00211/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed Section 37 Application for Emmock And Tealing OHL Tie-Ins**.

Please find the following responses relating to the **Ecology** and **Ornithology** sections below.
Ecology:
We are content with the proposed approach to assessing the potential effects of the Proposed Development on ecology. The survey methodology undertaken is adequate for generating sufficient ecological baseline information. We agree with the overview of ecological conditions in the study area, however adjacent heathland and acid grassland at Bakello and Balluderon Hills is considered ***locally rare*** in Angus and has not been referenced. This area is located to the west of the proposed development and includes existing tower AT1. The area was surveyed by Scottish Wildlife Trust in 1993 and has been identified for consideration for future designation as a Local Nature Conservation Site (LNCS). We acknowledge the impact on this land will be negligible due to the use of the pre-existing tower.

Ornithology:
We are content with the proposed approach to assessing the likely significant effects on ornithology arising from the proposed development. We are content with the survey approach regarding qualified features of designated sites and other protected bird species within the study area. The ornithological receptors identified and mitigation measures are appropriate.

Kind regards,
Anna

Anna Cowie I Project Officer – Environment | Planning & Sustainable Growth | Angus Council | Tel: 07769 243458 | Email: cowiea@angus.gov.uk | www.angus.gov.uk

Ed Taylor

From: Paul R Clark
Sent: 06 May 2025 15:56
To: Ed Taylor
Subject: RE: 25/00211/EIASCO – Consultation on content of EIA Report (Scoping) for EMMOCK AND TEALING OHL TIE-INS

Follow Up Flag: Follow up
Flag Status: Flagged

Ed

Table 4.1 doesn't give any consideration to Core Path 207 (Kirkton of Tealing to Balnuith), which is less than 50 metres from the proposed line and immediately below a section of line proposed for removal. There may be some short-term disruption to the core path during the construction phase. I don't think that need affect the conclusion that recreation can be screened out, but Table 4.1 should include reference to the path, and it will need to be considered in more detail at the planning application stage.

Best regards

Paul Clark | Countryside Access Officer | Angus Council | 01307 491863 | clarkpr@angus.gov.uk | www.angus.gov.uk

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By email to: Econsents_Admin@gov.scot

Lee Stirrat
Case Manager
Energy Consents Unit

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131 668 8716
HMConsultations@hes.scot

Our case ID: 300079799
Your ref: ECU00005204
13 May 2025

Dear Lee Stirrat

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Emmock and Tealing Overhead Line Tie-Ins
Scoping report

Thank you for consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 25 April 2025. We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.

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

Proposed development

We understand that the proposed development comprises diverting a short section of two existing double circuit 275 kilovolt (kV) overhead electricity lines (OHLs) in the vicinity of their connection point with Tealing Substation in Angus so that they are redirected to connect with the proposed Emmock 400 kV substation, and to install and keep installed two new short sections of 275 kV OHL connections between the Emmock and Tealing substations.

Scope of assessment

We recommend that the applicant refers to the EIA Handbook for best practice advice on assessing cultural heritage impacts.

We have identified likely significant effects on our historic environment interests. Our advice on the nature of these impacts, and any potential mitigation measures, are included in an annex to this covering letter. This also includes our requirements for information to be included in the EIA Report.

Further information

Decisions that affect the historic environment should take the Historic Environment Policy for Scotland (HEPS) into account as a material consideration. HEPS is supported by our Managing Change guidance series. In this case we recommend that you consider the advice in the setting guidance note.

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultations mailbox, hmconsultations@hes.scot. If you have questions about this response, please contact Victoria Clements at Victoria.Clements@hes.scot.

Yours sincerely

Historic Environment Scotland

ANNEX

Historic Environment Scotland's interest

The following designated historic environment assets are in the vicinity of the development and have the potential to be impacted by it. This list is not considered to be exhaustive, and we would recommend that a wider search is undertaken of the surrounding area for potential impacts in the first instance; any impacts to the settings of assets should be assessed appropriately to determine whether these will be significant.

We recommend that an appropriately detailed ZTV should be used to identify potential setting impacts in the first instance. We welcome that the scoping report indicates that a ZTV will be used and we have provided further comments below.

Scheduled monuments

Balkemback Cottages, stone circle 500m WNW of (SM2868)

The monument comprises a Neolithic/Bronze Age stone circle measuring 14m in diameter. Four stones remain, two of which are upright and measure about 1-1.2m high while the other two are recumbent and measure between about 1-1.5m in length. The stone in the east has rock art comprising around 20 cup-marks, including some cup-and-ring marks on its eastern face and a further 16 on its western face.

The monument is situated within a grassy field at around 600m AOD. Good, open outward views are possible from the monument in all directions, although views are slightly limited to the north and northwest by topography and a coniferous shelterbelt. The monument is also visible within the surrounding landscape, although perhaps not from great distances. The landscape character surrounding the monument is a largely open and rural, with some modern development in the vicinity including overhead lines (OHLs) to the north, east and south (although we note that the existing OHL indicated in yellow would be dismantled as part of this proposal) and some forestry plantations.

As the proposed new alignment (indicated in green) would be located approximately 220m west of the monument and is within the ZTV, we welcome that impacts on the setting of the monument will be assessed. We note that a Viewpoint (VP1) will be included in the EIA Report and suggest that this includes a wireframe and a photomontage. Given the proximity of the OHL, we would welcome any opportunities for micro-siting the OHL towers to reduce the impact on the setting of the monument. The potential for cumulative effects with the proposed 400kV Tealing to Kintore OHL and associated substations should also be assessed.

Martin's Stone, cross slab, Balkello (SM159)

The monument comprises a Pictish cross-slab dating to the second half of the 1st millennium AD and consisting of a sandstone slab measuring 2m high. A cross is present on one side of the stone; two horsemen, an elephant-like creature, a serpent and a Z-rod symbol are visible on the other. The monument is situated within an arable field at around 150m AOD. Good, open outward views are possible in all directions from the monument, and it is also visible within the surrounding landscape, although perhaps not from great distances. The landscape character surrounding the monument is a largely open and rural,

with some modern development in the vicinity, including an existing OHL running east/west to the south.

The proposed new alignment (indicated in green) would be located approximately 900m north-east of the monument and is within the ZTV. We welcome that impacts on the setting of the monument will be assessed and note that a Viewpoint (VP2) will be included in the EIA Report. In light of the distance to the OHL, we would be content for a wireframe to be produced for this asset. The potential for cumulative effects with the proposed 400kV Tealing to Kintore OHL and associated substations should also be assessed.

Craig Hill, fort and broch (SM3038)
The monument comprises a likely Iron Age broch and fort surviving as upstanding stone structures and earthworks and cropmarks visible on oblique aerial photographs measuring 280m E-W by 150m. The monument is situated on Craig Hill at around 130m AOD and this affords good, open long-distance views over the surrounding area. The monument is also visible from the surrounding landscape. The landscape character surrounding the monument is largely open and rural, with some modern development in the vicinity including an OHL running to the north.

The proposed new alignment (indicated in green) would be located approximately 3.4 km north-west of the monument and is within the ZTV. We welcome that impacts on the setting of the monument will be assessed and note that a Viewpoint (VP3) will be included in the EIA Report. In light of the distance to the OHL, we would be content for a wireframe to be produced. The potential for cumulative effects with the proposed 400kV Tealing to Kintore OHL and associated substations should also be assessed.

Scoping report

We welcome that chapter 6 of the Scoping Report states that direct physical impacts, indirect impacts, impacts on the setting of assets and cumulative impacts will be assessed. We recommend that an appropriate cultural heritage assessment methodology such as that laid out in Appendix 1 of the EIA Handbook is used for the assessment. We welcome that site visits are being carried out to assess the potential impacts on the settings of sites.

Section 6.2 indicates that a 3km study area is being proposed for the identification of assets which may receive impacts to their settings. We do not generally recommend the use of a specific radius for this purpose. As indicated above, we generally recommend that a ZTV is used in the first instance to identify assets which may receive impacts and any assets which might themselves fall outwith the ZTV but where important views towards them may have visibility of the turbines in the background of the asset. We welcome that section 6.2.2 confirms that a ZTV will be used to identify assets that may receive impacts to their setting.

We welcome the provision of visualisations that demonstrate potential impacts on the setting of historic environment assets and we have provided advice regarding visualisations for specific assets above. We welcome that the potential requirement for mitigation measures is identified within the Scoping Report. Such measures should be considered at an early stage so that they can be incorporated into the design of the project. It will be particularly important that there is the potential for OHL pylons to be micro-sited for instance where adverse impacts on historic environment assets are identified.

We are broadly content with the list of issues identified in section 6.9 to be scoped out of detailed assessment. We will be happy to continue to engage with the applicants as the project progresses, particularly in relation to any potential mitigation by design which may be identified.

Historic Environment Scotland
13 May 2025

Joyce Melrose
Onshore Electricity, Strategy and Consents
Directorate for Energy and Climate Change
Scottish Government
Sent by email to Econsents_Admin@gov.scot

22 April 2025
Our ref: CDM179933

Dear Joyce,

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

Request for Scoping Opinion for Proposed Section 37 Application for Emmock and Tealing OHL Tie-ins
Ref: ECU00005204

Thank you for your consultation request.

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

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

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

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

Yours sincerely

Jennifer Heatley - Operations Officer - North
jennifer.heatley@nature.scot

cc. Jamie Watt, SSEN Transmission

Annex A17

Lee Stirrat
Case Manager
Energy Consents Unit

By email only to: Econsents_Admin@gov.scot

Our Ref: PCS-20005277
Your Ref: ECU00005204

SEPA Email Contact:
planning.south@sepa.org.uk

09 May 2025

Dear Lee Stirrat

Electricity Act 1989 - Section 37
ECU00005204
Request for scoping opinion for proposed Section 37 application
Emmock and Tealing OHL Tie-Ins

Thank you for consulting SEPA for an Environmental Impact Assessment (EIA) scoping opinion in relation to the above development. We welcome engagement with the applicant at an early stage to discuss any of the issues raised in this letter.

Our position and advice, given below, is based on the Scottish Ministers ultimately determining that the proposal is classed as development that could be supported for the purposes of assessment under Policies 5 Soils and 22 Flood risk and water management**,** as defined in National Planning Framework 4 (NPF4). If this is not the case, please advise so we can re-consider our position and advice. We consider that this also covers the requirements in NPF4 Policies 2 Climate mitigation and adaption, 3 Biodiversity and 11 Energy.

Advice for the determining authority

To **avoid delay and potential objection** the EIA submission must contain a series of scale drawings of sensitivities, for example peat depth, peat condition, Groundwater Dependent Terrestrial Ecosystems (GWDTE), proximity to waterbodies, overlain with proposed permanent and temporary development. This is necessary to ensure the EIA process has informed the layout of the development to firstly avoid, then reduce and then mitigate significant impacts on the environment. We request that the issues covered in Appendix 1 below, which provides details of our standard information requirements for EIA development and the form in which they must be submitted, and Appendix 2, which provides additional development type specific advice, be addressed to our satisfaction in the EIA process.

We have also provided site specific comments in the following section which provides pre-application advice and can help the developer focus the scope of the assessment.

1. Site specific comments

1.1 In relation to Private Water Supplies we note that work is ongoing to identify the location of the potential PWS sources and associated pipework at Balluderon Farm and Old Balkello. We would advise that impacts on Groundwater Abstractions (which includes PWS) should not be scoped out of the EIA until further information is available. Please refer to Appendix 1 for our advice and information requirements in this regard.

1.2 We note that impacts on peat have been scoped out of the EIA. This is based on NatureScot (2016) Carbon and Peatland Mapping indicating that there are no areas of peat or carbon rich soils within the Proposed Development. We would request that the EIA report include justification for scoping out of this issue, including relevant soil maps. Details of the provisions that would be made should peat or other carbon rich soils be discovered on site should also be provided.

Annex A19

1.3 We note that no GWDTEs were identified in the ecology study area and that effects on GWDTE will be scoped out of the assessment. Justification for this, including mapped survey results, should be provided with the EIA submission.

1.6 Construction compounds, storage of temporary materials, siting of workers accommodation and mobile welfare units should be stored/located outwith the Future Flood Extent as shown on the SEPA - Flood Maps. Watercourse 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. Our Climate change allowances for flood risk assessment in land use planning guidance sets out required allowances for climate change. Further information is provided below.

1.7 We welcome that the design has incorporated a 50 m buffer from all watercourses and water features, which will minimise any effect on water quality and hydrology during construction. We note that two of the existing towers (WT9 and TW3) which are to be upgraded are 16 m and 25 m respectively from watercourses and both are within the predicted fluvial flood risk area from the Fithie Burn and a tributary. We welcome that no work will be undertaken during flood events in the known flood risk areas of the site. Please refer to Section 3 of Appendix 1, which sets out additional information that would be required where such breaches of recommended watercourse buffers occur.

If you have queries relating to this letter, please contact us at planning.south@sepa.org.uk including our reference number in the email subject.

Yours sincerely
Jessica Taylor
Senior Planning Officer
Planning Service

Ecopy to: Lee.Stirrat@gov.scot

Annex A20

Disclaimer: This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our website planning pages - www.sepa.org.uk/environment/land/planning/

Appendix 1: SEPA Energy generation and transmission EIA scoping requirements

Please note that some of our planning guidance referenced in this response has been reviewed and updated to reflect the National Planning Framework 4 (NPF4) policies. For example, our Flood Risk Standing Advice, Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems and the Guidance on Assessing the Impacts of Developments on Groundwater Abstractions.

This appendix sets out our minimum information requirements and we would welcome discussion around these prior to formal submission to avoid delays. There may be opportunities to scope out some of the issues below and in Appendix 2 depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site. If there is a significant length of time between scoping and application submission, the developer should check whether our advice has changed.

1. Site layout

1.1 Each of the drawings requested below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, landraising and other groundworks, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other construction and built elements. All drawings must be based on an adequate scale with which to assess the information.

1.2 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, and existing built infrastructure must be re-used or upgraded where possible.

1.3 A comparison of the environmental effects of alternative locations of infrastructure elements may be required. We seek absolute avoidance of development on the sensitive habitats detailed below. Where elements of a development haven't avoided for example near-natural peatland, adequate justification should be provided for the proposed layout. The justification should include how any impacts

are considered in relation to example the mitigation hierarchy as demonstrated through the Peat Management Plan (PMP) submission. This should be supported by maps with overlays of the peat maps and any other constraints, such as visual impact, to clearly demonstrate how these constraints have influenced any necessary need for development on peatland and other sensitive habitats within our remit.

2. Peatland and other carbon rich soils (CRS)

2.1 Peatland in near natural condition generally experiences low greenhouse gas emissions, is accumulating and may be sequestering carbon, has high value for supporting biodiversity, helps to protect water quality and contributes to natural flood management, irrespective of whether that peatland is designated for nature conservation purposes or not. Where proposals are on peatland or other CRS, the following should be submitted to address our requirements in relation to NPF4 Policy 5 to protect CRS and the ecosystem services they provide (including water and carbon storage).

2.2 It should be clearly demonstrated that the assessment has informed careful project design and ensured, in accordance with relevant guidance and the mitigation hierarchy in NPF4, that adverse impacts are first avoided and then minimised through best practice.

2.3 The submission should include a series of layout drawings, at a usable scale, showing all permanent and temporary infrastructure, along with the ancillary construction work areas, with the extent of excavation required. These plans should be overlaid on the following:

a) Peat depth survey showing peat probe locations, colour coded using distinct colours for each depth category. This must include adequate peat probing information to inform the site layout in accordance with the mitigation hierarchy in NPF4, which may be more than that outlined in the Peatland Survey – Guidance on Developments on Peatland (2017).

b) Peat depth survey showing interpolated peat depths.

c) Peatland condition mapping – the Peatland Condition Assessment photographic guide lists the criteria for each condition category and illustrates how to identify each condition category.

2.4 The detailed series of layout drawings above should clearly demonstrate that peat excavation has been avoided where possible. Where complete avoidance of peat and other CRS is not possible, justification should be provided to adequately demonstrate why this is the case, and it should be clearly demonstrated on the drawings that:

a) Development proposals avoid any near natural peatland and the deepest areas of peat.

b) All proposed excavation is on peat less than 1m deep, where feasible.

c) The volumes of peat excavated have been reduced as much as possible, first through layout and then by design, making use of techniques such as floating tracks.

2.5 The Outline Peat Management Plan (PMP) must include:

a) A table setting out the volumes of acrotelmic, catotelmic and amorphous peat to be excavated. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes.

b) A table clearly setting out the volumes of acrotelmic, catotelmic and amorphous excavated peat: (1) used in making good site specific areas disturbed by development, including borrow pits (quantities used in making good areas disturbed by development must be the minimum required to achieve the intended environmental benefit and materials must be suitable for the proposed use), (2)

used in on and off site peatland restoration, and (3) disposed of, and the proposed means of disposal (if deemed unavoidable after all other uses of excavated peat have been explored and reviewed).

c) Details of proposals for temporary storage and handling of peat - Good Practice during Wind Farm Construction outlines the approach to good practice when addressing issues of peat management on site and minimising carbon loss.

d) Suitable evidence that the use of peat in making good areas disturbed by development, including borrow pits, is genuine and not a waste disposal operation, including evidence on the suitability of the peat and evidence that the quantity used matches and does not exceed the requirement of the proposed use.

e) If peat is to be used in the reinstatement of borrow pits on site, cross sections and plans should be provided showing the proposed maximum peat depth profiles for each category of peat, phasing and final restoration profiles in relation to surrounding land with a clear hydrological justification for the use of catotelmic peat also being given. The target restoration habitat for each borrow pit should be specified, along with how this will be maintained and managed in perpetuity.

f) Use of excavated peat in areas not disturbed by the development itself is no longer a matter we provide planning advice on. Please refer to Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot 2023, and the Peatland ACTION – Technical Compendium, which provides more detailed advice on peatland restoration techniques. Unless the excavated peat is certain to be used for construction purposes in its natural state on the site from where it is excavated, it will be subject to regulatory control. The use of excavated peat off-site, including for peatland restoration, will require the appropriate level of environmental authorisation. Excavated peat will be waste if it is discarded, or the holder intends to or is required to discard it. These proposals should be clearly outlined so that we can identify any regulatory implications of the proposed activities. This will allow the developer and their contractors to tailor their planning and designs to

accommodate any regulatory requirements. Further guidance on this can be found in the document Is it waste - Understanding the definition of waste.

3. Water environment

3.1 Policy 11 of NPF4 requires that the project design and mitigation demonstrate how impacts on hydrology, the water environment and flood risk are addressed. The proposals should demonstrate how impacts on local hydrology have been minimised and the site layout designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors.

3.2 The submission must include a set of drawings showing:

a) The footprint of all proposed temporary and permanent infrastructure (including all the ancillary construction work areas, for example excavations, landraising and other groundworks, storage, laydown and working areas) overlain with all waterbodies.

b) The minimum buffer around each waterbody, as detailed in Table 1 of Recommended Riparian Corridor Layer for use in Land Use Planning, from all construction activities including working and storage areas, or 50m where subsurface activities are more than 1m in depth. If these minimum buffers cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the waterbody, drawings of what is proposed in terms of any engineering works, and details of why the minimum buffer cannot be achieved and mitigation measures to protect the feature.

c) A map showing the location, size, depths and dimensions of all borrow pits overlain with all waterbodies within 250m and showing a site-specific buffer around each waterbody proportionate to the depth of excavations. The information provided needs to demonstrate that a site-specific proportionate buffer can be achieved.

3.3 Further advice and our best practice guidance are available on our sepa.org.uk/regulations/water/engineering/ webpage. Guidance on the design of

water crossings can be found in the Construction of River Crossings Good Practice Guide.

4. Groundwater Dependent Terrestrial Ecosystems and existing groundwater abstractions

4.1 The construction and operation of developments can disrupt groundwater flow and impact on Groundwater Dependent Terrestrial Ecosystems (GWDTE), which are protected under the Water Framework Directive, and existing groundwater abstractions. The layout and design of the development must avoid adverse impacts on such areas, ensuring the water environment, including GWDTE and existing groundwater abstractions, are protected.

4.2 As detailed in our Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems and the Guidance on Assessing the Impacts of Developments on Groundwater Abstractions, a phased approach to the assessment of risks to GWDTE and groundwater abstractions is recommended, with greater detail being required for higher risk sites or activities.

4.3 Where monitoring is required, please note that baseline monitoring is expected to commence at least 12 months ahead of the development works starting on site and this should be factored into the timescales for submitting the Environmental Impact Assessment Report (EIAR) and commencement of development.

Groundwater Dependent Terrestrial Ecosystems (GWDTE)

4.4 A Phase 1 habitat survey should be provided unless the developer is already aware that GWDTE are likely to be present. Where initial assessment results indicate relevant habitats may be present, a National Vegetation Classification (NVC) survey should be submitted, along with the following information:

a) A set of drawings demonstrating all GWDTE are outwith a 10m radius of all activities, 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m. The survey needs to extend beyond the site boundary where the distances require it.

b) If the minimum buffers cannot be achieved, a conceptual site model (CSM) should be provided that includes interpretation of the hydrogeological setting, including the groundwater flow regime, and the ecological features present. This may be supported, as appropriate, by intrusive ground investigation, groundwater monitoring, or groundwater modelling in addition to topography, properties of the emergent water and the soil, and underlying geology. Please refer to Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems for further advice on undertaking detailed site specific qualitative and/or quantitative risk assessments and the minimum information we require to be submitted.

c) Please note that while we will accept The UK Habitat Classification System (UKHab) as an alternative to a Phase 1 habitat survey, due to discrepancies in habitat definition and ambiguity in correspondence with NVC types, we do not accept the use of the UKHab as an alternative to NVC.

Groundwater abstractions

4.5 The source (rather than the property it supplies) of both public and private water supply groundwater abstractions, both within and outwith the site boundary, should be identified. Scottish Water holds information regarding public water supplies and the Local Authority holds records of private water supplies. Note that the information held by the Local Authority will sometimes relate to the property served by the private water supply, rather than the location of the source itself (e.g. the house rather than the borehole or spring). Therefore, the details of each private water supply source require confirmation, including a site walkover survey.

4.6 The following information should be submitted where the assessment results indicate groundwater supplies may be present:

a) A set of drawings demonstrating all groundwater abstractions are outwith a 10m radius of all activities, 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m. The survey needs to extend beyond the site boundary where the distances require it.

b) If the minimum buffers cannot be achieved a conceptual site model should be provided that includes interpretation of the hydrogeological setting, including the groundwater flow regime. This may be supported, as appropriate, by intrusive ground investigation, groundwater monitoring, or groundwater modelling. Please refer to Guidance on Assessing the Impacts of Developments on Groundwater Abstractions for further advice on undertaking detailed site specific qualitative and/or quantitative risk assessments and the minimum information we require to be submitted.

5. Flood risk

5.1 We reiterate that, as detailed above, our position and advice is based on the determining authority determining that the proposal is supported under Policy 22**,** as defined in NPF4, unless we are advised otherwise.

5.2 Advice on flood risk is available at Flood Risk Standing Advice and reference should also be made to Controlled Activities Regulations (CAR) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities.

5.3 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. Our Climate change allowances for flood risk assessment in land use planning guidance sets out required allowances for climate change.

5.4 In order to establish that the five bullet points within NPF4 Policy 22a have been satisfied and where 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 provides generic requirements for undertaking Flood Risk Assessments as well as our Climate change allowances for flood risk assessment in land use planning guidance.

5.5 The FRA should specifically address the following issues:

a) All existing watercourses and drains on the site are fully identified and flow pathways understood in relation to the 1 in 200 year plus climate change flood levels for the catchment.

b) The modelling should extend far enough upstream to capture any flow pathways which may impact the development site.

c) Demonstration there is no increased flood risk to existing properties in the vicinity of the proposed development and, if possible, demonstrate an improvement.

d) Any intended realignment or alteration of channels should also be outlined and accounted for within the FRA, with analysis showing pre and post development flood risk.

e) Where applicable, flows should be shown to be accommodated within any altered channel to avoid flooding of existing structures, access roads or increased risk for others.

5.6 Generally, we are unable to support landraising within a flood risk area unless it is required for development outlined under the exceptions in Policy 22a of NPF4. Which, as indicated above, we understand this proposal is unless notified otherwise, and as such we may be able to accept. However, where landraising is proposed within the flood risk area identified within the FRA, it should be linked to compensatory storage and demonstrated that there is no reduction in floodplain capacity, or increased risk for others. Notwithstanding this, any landraising must be shown to be minimised as far as possible.

5.7 Culverting for land gain would not be supported by us. If any works to alter watercourse channels are proposed, we would expect betterment to the channel and utilisation of this opportunity to help reduce flood risk to the wider site and any other nearby receptors.

6. Environmental enhancements

6.1 Policy 3 of NPF4 requires all EIA development to demonstrate that the proposal will conserve, restore and enhance biodiversity, including nature networks, so they are

in a demonstrably better state than without intervention. EIA development should fully mitigate potential negative effects prior to identifying biodiversity enhancements, with the enhancements provided in addition to mitigation. We have published a data set which identifies where riparian planting would be most beneficial. This is available via the data publication page at sepa.org.uk/environment/environmental-data/. We highlight there may be opportunities for riparian planting along watercourses within landownership boundaries and would welcome the exploration of such planting as part of any biodiversity net gain proposals.

7. Forest removal and forest waste

7.1 If forestry is present on the site, the site layout should be designed to avoid large scale felling, as this can result in substantial amounts of waste material and a peak in release of nutrients which can affect local water quality.

7.2 The submission must include drawings 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 and our guidance Management of Forestry Waste.

8. Pollution prevention and environmental management

8.1 The submission must include a schedule of mitigation, which includes reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils and peat at any one time) and regulatory requirements. Please refer to the Guidance for Pollution Prevention (GPPs), along with our sepa.org.uk/regulations/water/construction/ and sepa.org.uk/regulations/water/pollution-control/water-run-off-from-construction-sites/ webpages, for more information and advice.

8.2 A commitment must also be included in the schedule of mitigation that micrositing will not encroach into sensitive areas, to avoid adversely affecting mitigation measures identified in the EIAR that seek to avoid and/or minimise adverse effects on sensitive receptors (eg peat, watercourse and GWDTE buffers).

9. Life extension, repowering and decommissioning

9.1 The discarding of materials as waste should be avoided and the waste hierarchy applied to waste produced during construction, operation and decommissioning of the development. If there is an intention to discard materials then further guidance on this can be found in Is it waste - Understanding the definition of waste, and our sepa.org.uk/regulations/waste/ and sepa.org.uk/regulations/waste/guidance/ webpages.

10. Other planning matters

10.1 For all other planning matters, we refer you and the developer to the relevant standing advice in our Triage guidance and standing advice, which is equally applicable to Electricity Act applications.

11. SEPA authorisation

11.1 We authorise several matters relating to water, waste management, radioactive substances, and pollution prevention and control. In 2018, the Scottish Government brought in the Environmental Authorisations (Scotland) Regulations 2018 (EASR 2018). The aim of these Regulations is to provide a standardised, simplified, common framework for environmental authorisations in Scotland, known as an Integrated Authorisation Framework (IAF). A copy of the draft Environmental Authorisations (Scotland) Amendment Regulations 2025 can be found at legislation.gov.uk/sdsi/2025/9780111062319/introduction.

11.2 The IAF is being developed in a phased manner during 2025, with the regulations applying initially to radioactive substances activities in early 2025. For further information on the amendment of the regulations please refer to our sepa.org.uk/regulations/how-we-regulate/environmental-authorisations-scotland-regulations-2018/ webpage.

11.3 It is an applicant's responsibility to ensure their proposals will meet all relevant regulatory requirements and they are working within regulatory guidelines. We prefer all the technical information required for any SEPA authorisations to be submitted at the same time as the planning or similar application. We consider it to be at the

applicant's commercial risk if planning permission is granted for a development/process which cannot gain authorisation from us, or if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising.

11.4 Our sepa.org.uk/regulations/ webpage provides good practice advice and guidance and defines those activities which may require authorisation by SEPA, along with details of how to contact us for more help, advice and how to apply for any necessary authorisations.

Appendix 2: SEPA's additional EIA scoping requirements by type of development

The below advice should be read in conjunction with the scoping advice in Appendix 1 above.

1. Overhead lines (OHL)

1.1 The submission must clearly detail which associated elements of the development, such as temporary site compounds, mobile welfare units and temporary workers accommodation, are included as part of the application and which of these are off-site and/or will be subject to separate planning application(s). Information should also be provided on how the development will be accessed. The location of permanent and temporary tracks should be confirmed and whether tracks are to be cut or floated. Areas for temporary tracks or boards should also be indicated but need not be surveyed.

1.2 An initial phase of peat probing should take place in all locations where mapped information suggests peat may be present. Further detailed probing need only take place in locations where initial survey suggests peat greater than 1 m is present.

1.3 Construction compounds, storage of temporary materials, siting of workers accommodation and mobile welfare units should be stored/located outwith the Future Flood Extent as shown on the SEPA - Flood Maps.

1.4 Where the works are, in the most part, an upgrade to existing transmission infrastructure that is already in place, our interests are around the ground clearance works, any new and upgraded access tracks and the pollution prevention and environmental management measures that are proposed to mitigate the risk associated with the construction phase works.

By email to: Econsents_Admin@gov.scot

8th May 2025

Dear Sir/Madam,

Re: Emmock and Tealing OHL Tie-ins ECU00005204

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

Outdoor Access

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

In *Table 4.1 Topics Scoped Out* of their *Scoping and Screening Report* the applicant suggests that recreation should be excluded from the EIA because *"there are no footpaths or cycleways present on, or immediately adjacent, to the Proposed Development"*. They go on to say *"… the survey area supports no other forms of recreational activity"*. These statements are very misleading.

There are two designated Core Paths that may be affected by their proposals:

- Core Path 207 Kirkton of Tealing to Balnuith passes close to the northern boundary of Tealing sub station and under a section of OHL which is to be dismantled.
- Core Path 210 Kirkton of Auchterhouse to Balluderon passes under the proposed alignment between AT1 and AT2.

I am concerned the applicant has apparently overlooked the designated Core Paths when considering recreation, when they then appear on *Figure 5.2 Landscape and Visual Receptors*.

In addition to these designated routes, other paths, tracks and informal routes are likely to be used by all access takers. Quiet, informal routes, such as farm tracks and field margins, are especially valuable to equestrians and can lead to them passing closer to work sites than anticipated.

As this is an area of high horse ownership, it is likely the core paths and other routes are used by equestrians, as well as walkers and cyclists. Consideration should therefore be given to how public access will be managed alongside construction work and I suggest this would be best done through the preparation of an Outdoor Access Management Plan.

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

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

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

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

Equestrian land use, horse care and welfare
In *Table 4.1 Topics Scoped Out* of their *Scoping and Screening Report* the applicant states, *"The Site currently comprises agricultural land primarily given over to grass crop with traditional boundary treatments including stonewalls, ditches and fences. There are no other land uses within the Site."* The applicant should be aware be aware that there are equestrian properties immediately adjacent to the site at Balnuith, and several other equestrian properties within 3km of the site.

Horse owners need access to attend to their horses at least twice a day and more often if they are managing an injury or other health issue. In addition, in an emergency, a horse owner and/or a vet may need vehicular access at any time and at very short notice. It is important to consider how to ensure the safety and welfare of horses kept within the vicinity of the site and how to ensure their owners will have access to care for them during the construction. Some horses may become stressed and alarmed by construction work taking place as close as 300m from their field.

I strongly advise the applicant to engage with local horse owners at an early stage to discuss any potential issues and concerns and develop appropriate mitigation measures.

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

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

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

Kind regards,

REDACTED

Catriona Davies
Scotland Access Officer
The British Horse Society

Guidance for Drivers of Large Vehicles

Horses are naturally nervous of large vehicles, especially if they do not often meet them. If they are very frightened, they can run away in panic. Whilst their rider or carriage driver will do all they can to prevent this, should it happen, it could cause a serious accident for the horse and rider or carriage driver and for other road users.

The main factors which cause fear in horses are:

- Being approached by a large, moving object, which may be unfamiliar or intimidating to them,
- Lack of space between themselves and the vehicle,
- The noise of the vehicle, especially air brakes,
- Picking up on the anxiety of their rider or carriage driver.

Horses have keen eyesight and due to the position of their eyes on the sides of their head, can detect vehicles approaching from behind as well as ahead. They also have very sensitive hearing and will detect an approaching vehicle, and begin to react, before their rider or carriage driver.

How can you help?

When you meet a horse on the road:

- Slow down to 10mph or less and be prepared to stop if necessary.
- Be aware that the sound of your air brakes may spook a horse.
- If a horse shows signs of nervousness as you approach, stop, turn off your engine and allow them to move away. Don't move off again until they are well clear of your vehicle.
- Pass wide and slow, when it is safe to do so – allow at least 2m between your vehicle and the horse, and drive away slowly.
- If you are approaching a horse on a narrow road and wish to pass or overtake, slow down and give the rider or carriage driver time to find a gateway, layby or other refuge to create sufficient space between the horse and your vehicle.
- Please be patient. Most riders and carriage drivers will do their best to make way as quickly and safely as they can.
- The safest place for a rider or carriage driver's hands is on the reins, so they may only be able to nod their thanks to you, but please be assured, they will be very grateful for your consideration.

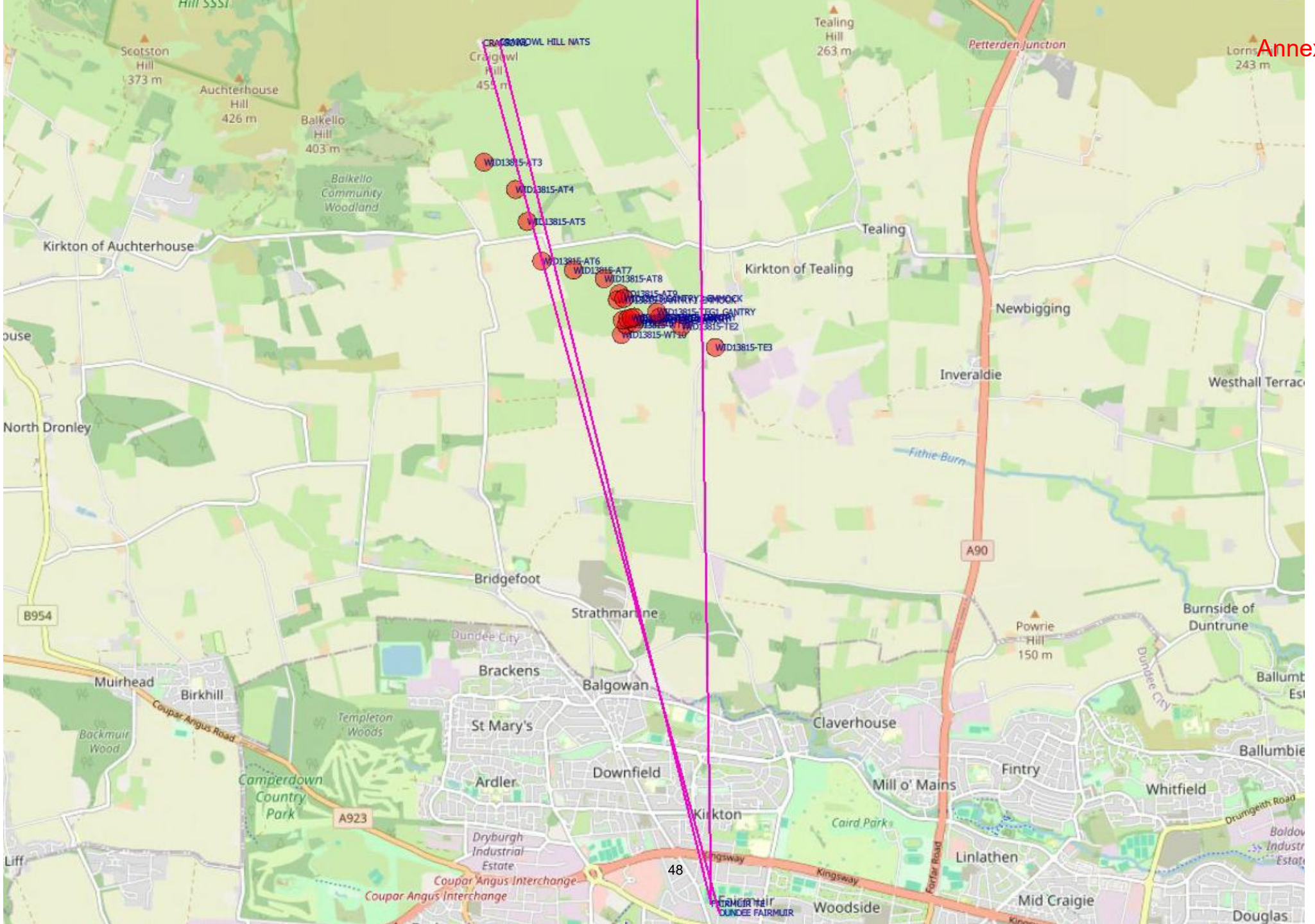
Thank you for helping to keep horses, and the people who care for them, safe.

OUR REF:- WID13815

We have studied the proposed development with respect to EMC and related problems to BT point-to-point microwave radio links.
Proposed towers AT4,AT5 and AT6 are in close proximity to an existing fixed BT link
However, our link passes over at a sufficiently high altitude of the highest tower which is 57.3m of AT5

Therefore the conclusion is that the Project indicated should not cause interference to BT's current and presently planned radio network.

BT requires 100m minimum clearance from any structure to the radio link path. It should be noted that this decision is for the date of its issue as the use of the spectrum is dynamic and can change on an ongoing basis.
Therefore, please reconsult us if there are any changes during the planning process with heights and locations of any structures, and its finalisation, as we may have new links assigned by Ofcom over its duration.


Scotston Hill 373 m
Auchterhouse Hill 426 m
Balkello Hill 403 m
Craigowl Hill 455 m
Tealing Hill 263 m
Petterden Junction
Balkello Community Woodland
WID13815-AT3
WID13815-AT4
WID13815-AT5
WID13815-AT6
WID13815-AT7
WID13815-AT8
WID13815-TE1 GANTRY
WID13815-TE2
WID13815-TE3
Kirkton of Auchterhouse
Tealing
Kirkton of Tealing
Newbigging
Inveraldie
North Dronley
Fithie Burn
A90
Bridgefoot
Strathmartine
B954
Dundee City
Brackens
Balgowan
Powrie Hill 150 m
Burnside of Duntrune
Muirhead
Birkhill
Coupar Angus Road
Templeton Woods
Backmuir Wood
St Mary's
Claverhouse
Camperdown Country Park
A923
Ardler
Downfield
Mill o' Mains
Fintry
Whitfield
Kirkton
Caird Park
Dryburgh Industrial Estate
Coupar Angus Interchange
Kingsway
Forfar Road
Linlathen
Drumgeith Road
Mid Craigie
Woodside
Douglas
DUNDEE FAIRMUIR

Defence Infrastructure Organisation

Fi Morrison
Assistant Safeguarding Manager
Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

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

www.mod.uk/DIO

Joyce Melrose
Energy Consents Unit,
Scottish Government,
4th Floor, 5 Atlantic Quay,
150 Broomielaw,
Glasgow
G2 8LU

7th May 2025

Your reference: ECU00005204
Our reference: DIO 10066990

Dear Joyce,

MOD Safeguarding – SITE OUTSIDE SAFEGUARDING AREA (SOSA)

Proposal: Emmock and Tealing OHL Tie Ins - installation of two short sections of parallel 275kv OHL tiebacks between the proposed Emmock substation and Tealing substation.

Location: Land in the vicinity of Tealing Substation approximately 5 km north of Dundee and approximately 1 km south-west of Kirkton of Tealing village within the planning authority area of Angus Council.

Grid Ref:

Tower Name	Easting	Northing
YE1 (New Tower)	337592	738949
YE4 (New Tower)	338081	738092
YE7 (New Tower)	338766	737776
EW1R1 (New Tower)	338781	737417
EW2R1 (New Tower)	338824	737500
TER1 (New Tower)	338894	737516
TE3-3 (New Tower)	339606	737292
TE3-2 (New Tower)	339311	737480

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

This application is a Scoping Application for the diversion of short sections of the Alyth to Tealing and Westfield to Tealing 275kv OHL as well as seeking an opinion for the installation of two short sections of parallel 275kv OHL tiebacks between the proposed Emmock substation and Tealing substation.

This application relates to a site outside of Ministry of Defence safeguarding areas.

Low Flying

In this case the development falls within Low Flying Area 14 (LFA 14), an area within which military aircraft may conduct low level flight training. The addition of a development featuring tall or narrow profile structures such as electricity towers in this locality has the potential to introduce a physical obstruction to low flying aircraft operating in the area.
To address this impact, and given the location and scale of the development, the MOD require that a condition is added to any consent issued requiring that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. Suggested condition wordings are set out in Appendix A.

In summary the MOD has no objection to this application subject to the towers being charted on aviation maps.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed on the Scottish Government Energy Consents Unit website as of the date of this letter. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

Redacted

Fi Morrison
Assistant Safeguarding Manager
DIO Safeguarding

(Appendix A Enclosed)

Appendix A

Condition - Aviation Charting and Safety Management
The undertaker must notify the Ministry of Defence, at least 14 days prior to the commencement of the works, in writing of the following information:

a) the date of the commencement of the erection of the lattice towers.
b) the maximum height of any construction equipment to be used in the erection of the lattice towers.
c) the date any **lattice towers** are brought into use.
d) the latitude and longitude and maximum heights of each lattice towers.

This information would also need to be sent by e-mail to UK DVOF & Powerlines at dvof@mod.gov.uk or posted to:

D-UKDVOF & Power Lines
Air Information Centre
Defence Geographic Centre
DGIA
Elmwood Avenue
Feltham
Middlesex
TW13 7AH

The Ministry of Defence must be notified of any changes to the information supplied in accordance with these requirements and of the completion of the construction of the development.

Reason for condition.
To maintain aviation safety.

From: Safeguarding
To: Econsents Admin; Joyce Melrose
Cc: Safeguarding
Subject: RE: EMMOCK AND TEALING OHL TIE-INS
Date: 09 May 2025 14:58:12
Attachments: values2025_49f0881e-b581-44a4-b961-1aecd2620b56.png

OFFICIAL

OFFICIAL

Your Ref: ECU00005204
Our Ref: 2025/091/DND

Dear Sir/Madam,

Proposal: ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR EMMOCK AND TEALING OHL TIE-INS

The development has been assessed using the criteria below:

Tower No	Status	Tower Type (& Height)	Easting	Northing
AT1	Existing	D10 E12(BC) E24(AD) (51.1 m)	336867	738927
AT2	Existing	L8 E4(AD) STD(BC) (47.7 m)	337187	738937
AT3	New	L8(C) DJT E11 (59.1 m)	337592	738949
AT4	New	L8(C) D30 STD (43.7 m)	337866	738705
AT5	New	L8(C) D E11.0 (57.3 m)	337965	738422
AT6	New	L8(C) D60 E3.7 (48.01 m)	338088	738073
AT7	New	L8(C) D E3.7 (49.9 m)	338366	737989
AT8	New	L8(C) D30 STD (43.7 m)	338636	737910
AT9	New	L8(C) DJT STD (48.1 m)	338766	737776
Gantry 1 - Emmock	New	Gantry Emmock (12.0 m)	338749	737721
Gantry 2 – Emmock	New	Gantry Emmock (12.0 m)	338806	737734
WT9	Existing	L2 D E20 (50.1 m)	338525	737385
WT10	New	L8(C) DJT STD (62.9 m)	338781	737417
WT11	New	L8(C) DJT STD (48.1 m)	338824	737500
WTG1	New	Gantry Emmock (12.0 m)	338790	737542
WTG2	New	Gantry Emmock (12.0 m)	338837	737552
TW4	Existing	L2 DT45 M24 (44.6 m)	339843	737078
TW3	Existing	L2 D E20 (50.1 m)	339520	737268
TW2	Existing	L2 D60 E12 (46.6 m)	339209	737448
TW1	New	L8(C) DJT STD (48.1 m)	338894	737516
TWG1	New	Gantry 275 kV (Emmock) (12.0 m)	338899	737567
TWG2	New	Gantry 275 kV (Emmock) (12.0 m)	338868	737560
TE4	Existing	L8 DJT STD BK T866 (48.2 m)	339902	737104
TE3	New	L8(C) D E7.3 (53.6 m)	339606	737292
TE2	New	L8C D30 STD (43.7 m)	339311	737480
TE1	New	L8(C) DJT STD (48.8 m)	339120	737566
TEG1	New	Gantry 275 kV (Emmock) (12.0 m)	339096	737611

HIAL has been consulted on the above proposed development, received by this office on: 17/04/2025

With reference to the above proposal, our preliminary assessment shows that, at the given position and height, this development would not infringe the safeguarding criteria and operation of Dundee Airport.

Therefore, Highlands and Islands Airports Limited has no objections to the proposal.

Any variation of the parameters (which include the location, dimensions, form, and finishing materials) then as a statutory consultee HIAL requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

Kind regards,

Nyree

Safeguarding
Highlands and Islands Airports Ltd
Inverness Airport Dalcross IV2 7JB
www.hial.co.uk

Katie Butchart

From: Joint Radio Company <wftracker@jrc.co.uk>
Sent: 30 April 2025 15:24
To: Lee Stirrat
Cc: Econsents Admin
Subject: Re: Emmock Substation - New OHL line to tie-in to the existing Alyth-Tealing OHL

Dear Sir, Madam

Thank you for your advisory regarding the **Overhead Line to tie in Emmock substation to the existing Alyth-Tealing OHL**.

JRC has no comment to make on this application at this time.

In the case of this proposed development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the development change, particularly the disposition or scale of any towers, it will be necessary to re-evaluate the proposal. Please note that due to the large number of adjacent microwave links in this vicinity, which have been taken into account, clearance is given specifically for a location within the declared grid reference (quoted above).

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, you are advised to seek re-coordination prior to submitting a planning application, as this will negate the possibility of an objection being raised at that time as a consequence of any links assigned between your enquiry and the finalisation of your project.

JRC offers a range of radio planning and analysis services. If you require any assistance, please contact us by phone or email.

With best wishes

The Windfarm Team.

Friars House
Manor House Drive
Coventry CV1 2TE
United Kingdom

Office: 02476 932 185

From: NATS Safeguarding
To: Econsents Admin; Joyce Melrose
Subject: RE: EMMOCK AND TEALING OHL TIE-INS [SG35319]
Date: 25 April 2025 09:40:02
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

Our Ref: SG35319

Dear Sir/Madam

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

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

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

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

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

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

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

Selina Gourlay
Town Planning Technician

Planning reference: ECU00005204

Case Officer: Joyce Melrose

E-Mail:
TownPlanningScotland@networkrail.co.uk

Network Rail ref: 133 2025

08/05/2025

Dear Ms Melrose,

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR EMMOCK AND TEALING OHL TIE-INS

Thank you for consulting Network Rail regarding the above development.

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

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

Yours sincerely

REDACTED

Selina Gourlay
Town Planning Technician

Annex A49

Katie Butchart

From: Young, Bryan <Bryan.Young@sgn.co.uk>
Sent: 17 April 2025 10:34
To: Econsents Admin
Subject: EMMOCK AND TEALING OHL TIE-INS

Classified as Internal

Good morning,

SGN do not have any High Pressure assets within the vicinity of the above consultation and as such would have no comment/objection,

Kind regards

Bryan Young
Pipeline Officer
Bryan.young@sgn.co.uk
Axis House Edinburgh
sgn.co.uk
Find us on Facebook and follow us on Twitter: @SGNgas

Smell gas? Call 0800 111 999
Find out how to protect your home from carbon monoxide

Scotland Gas Networks plc (company registration number SC264065) is registered in Scotland and has its registered office address at Axis House, 5 Lonehead Drive, Newbridge, Edinburgh EH28 8TG

Annex A51

Development Management and Strategic Road Safety
Roads Directorate

5th Floor, 177 Bothwell Street, Glasgow, G2 7ER
lain.clement@transport.gov.scot

TRANSPORT SCOTLAND
CÒMHDHAIL ALBA

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

econsents_admin@gov.scot

Your ref:
EC00005204

Our ref:
GB01T19K05

Date:
09/05/2025

Dear Sirs,

ELECTRICITY ACT 1989

THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR EMMOCK AND TEALING OHL TIE-INS

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by Land Use Consultants Limited in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, Transport Scotland would provide the following comments.

Proposed Development

The proposed development comprises the installation of a new 2.2km section of the Alyth to Tealing Overhead Line (OHL) and a new 150m section of the Westfield to Tealing OHL, both to connect with the separately proposed Emmock substation, to be located approximately 5km north of Dundee. The nearest trunk road to the site is the A90(T) which lies approximately 3km to the east at Tealing.

Assessment of Environmental Impacts

Chapter 4 of the SR presents the topics to be scoped out of the forthcoming assessment. We note that the topic of Traffic and Transport is included within this chapter, with the justification being as follows:

Traffic generated by the Proposed Development during the construction phase, based upon the Applicant's experience developing similar infrastructure, would be minimal in volume and would utilise existing traffic routes with residual capacity. Although the volume of construction traffic would be low (and would not be considered as Significant) this information would be updated

against the proposed construction programme in the form of a concise Transport Statement (TS) that would be incorporated in the Section 37 application documentation.

Transport Scotland is satisfied with this approach and considers that the production of a Transport Statement is appropriate in this instance. We would, however, seek an assessment of the potential impact of development generated traffic on the A90(T) in the form of a threshold assessment.

This should be carried out in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines, entitled Environmental Assessment of Traffic and Movement (July 2023). These specify that road links should be taken forward for further assessment where the following two rules are breached:

Rule 1: Include road links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%)

Rule 2: Include road links of high sensitivity where traffic flows have increased by 10% or more.

In addition, Transport Scotland would state that National Road Traffic Forecast (NRTF) Low Traffic Growth assumptions will require to be applied to base traffic to provide a common future year baseline to coincide with the expected construction traffic peak.

Where significant changes in traffic are not noted for any link, no further assessment needs to be undertaken and we note that this would be the likely outcome here.

Abnormal Loads Assessment

We note that the use of Abnormal Indivisible Loads (AIL) will be required during construction. We would state that Transport Scotland 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.

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.

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

Yours faithfully

REDACT

Pp Iain Clement

Transport Scotland
Roads Directorate

cc Alan DeVenny – SYSTRA Ltd.

Marine Directorate – Science Evidence Data and Digital (MD-SEDD) advice on freshwater and diadromous fish and fisheries in relation to the installation of overhead line developments.

Updated September 2023

Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provides internal, non-statutory, advice in relation to freshwater and diadromous fish and fisheries to the Scottish Government's Energy Consents Unit (ECU) for the installation and maintenance of overhead line (OHL) developments in Scotland.

Atlantic salmon (*Salmo salar*), sea trout and brown trout (*Salmo trutta*) are of high economic value and conservation interest in Scotland and for which MD-SEDD has in- house expertise. The route of OHLs often cross watercourses which support important salmon and trout populations. MS-SEDD aims, through our provision of advice to ECU, to ensure that the installation and maintenance of these OHLs do not havea detrimental impact on the fish habitat and populations.

The Electricity Works (Environmental Impact Assessment) (EIA) (Scotland) Regulations (2017) state that the EIA must assess the direct and indirect significant effects of the proposed development on water and biodiversity, and in particular species (such as Atlantic salmon) and habitats protected under the EU Habitats Directive. Salmon and trout are listed as priority species of high conservation interest in the Scottish Biodiversity List and support valuable recreational fisheries.

A good working relationship has been developed over the years between ECU and MD-SEDD, which ensures that these fish species are considered by ECU during all stages of the application process of OHL developments and are similarly considered during the installation and maintenance of future transmission lines. It is important that matters relating to freshwater and diadromous fish and fisheries, particularly salmon and trout, continue to be considered during the installation and maintenance of future OHLs.

In the current document, MD-SEDD sets out a revised, more efficient approach to the provision of our advice, which utilises our generic scoping and monitoring programme guidelines (https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren). This standing advice provides regulators (e.g. ECU, local planning authorities), developers and consultants with the information required at all stages of the application process for OHL projects, such that matters relating to freshwater and diadromous fish and fisheries are addressed in the same rigorous manner as is currently being carried out and continue to be fully in line with EIA regulations. At the request of ECU, MD-SEDD will still be able to provide further and/or bespoke advice relevant to freshwater and diadromous fish and fisheries e.g. site specific advice, at any stage of the application process for a proposed development, particularly where a development may be considered sensitive or contentious in nature.

MD-SEDD will continue undertaking research, identifying additional research requirements, and keep up to date with the latest published knowledge relating to the

impacts of onshore wind farms on freshwater and diadromous fish populations. This will be used to ensure that our guidelines and standing advice are based on the best available evidence and also to continue the publication of the relevant findings and knowledge to all stakeholders including regulators, developers and consultants.

MD-SEDD provision of advice to ECU

- MS-SEDD should not be asked for advice on pre application and application consultations (including screening, scoping, gate checks and EIA applications). Instead, the MD-SEDD scoping guidelines and standing advice (outlined below) should be provided to the developer as they set out what information should be included in the EIA report;
- if new issues arise which are not dealt with in our guidance or in our previous responses relating to respective developments, MD-SEDD can be asked to provide advice in relation to proposed mitigation measures and monitoring programmes which should be outlined in the EIA Report (further details below);
- if new issues arise which are not dealt with in our guidance or in our previous responses, MD-SEDD can be asked to provide advice on suitable wording, within a planning condition, to secure proposed monitoring programmes, should the development be granted consent;
- MD-SEDD cannot provide advice to developers or consultants, our advice is to ECU and/or other regulatory bodies.
- if ECU has identified specific issues during any part of the application process that the standing advice does not address, MD-SEDD should be contacted.

MD-SEDD Standing Advice for each stage of the EIA process

Scoping

MD-SEDD issued generic scoping guidelines (https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren) which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm and transmission line developments and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.

If a developer identifies new issues or has a technical query in respect of MD-SEDD generic scoping guidelines then ECU should be informed who will then co-ordinate a response from MD-SEDD.

Gate check

The detail within the generic scoping guidelines already provides sufficient information relating to water quality and salmon and trout populations for developers at this stage of the application.

Developers will be required to provide a completed gate check checklist (annex 1) in advance of their application submission which should signpost ECU to where all matters relevant to freshwater and diadromous fish and fisheries have been presented in the EIA report. Where matters have not been addressed or a different approach, to that specified in the advice, has been adopted the developer will be required to set out why.

EIA Report

MD-SEDD will focus on those developments which may be more sensitive and/or where there are known existing pressures on fish populations (https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/fishreform/licence/status/Pressures). The generic scoping guidelines should ensure that the developer has addressed all matters relevant to freshwater and diadromous fish and fisheries and presented them in the appropriate chapters of the EIA report. Use of the gate check checklist should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process:

Developers should specifically discuss and assess potential impacts and appropriate mitigation measures associated with the following:

- any designated area, for which fish is a qualifying feature, within and/or downstream of the proposed development area;
- the presence of a large density of watercourses;
- the presence of large areas of deep peat deposits;
- known acidification problems and/or other existing pressures on fish populations in the area; and
- proposed felling operations.

Post-Consent Monitoring

MD-SEDD recommends that a water quality and fish population monitoring programme is carried out to ensure that the proposed mitigation measures are effective. A robust, strategically designed and site specific monitoring programme conducted before, during and after construction can help to identify any changes, should they occur, and assist in implementing rapid remediation before long term ecological impacts occur.
MD-SEDD has published guidance on survey/monitoring programmes associated with onshore wind farm developments (https://www2.gov.scot/Topics/marine/Salmon- Trout-Coarse/Freshwater/Research/onshoreren) which developers should follow when drawing up survey and/or monitoring programmes

If a developer considers that such a monitoring programme is not required then a clear justification should be provided.

Planning Conditions

MD-SEDD advises that planning conditions are drawn up to ensure appropriate provision for mitigation measures and monitoring programmes, should the development be given consent. We recommend, where required, that a Water Quality Monitoring Programme, Fisheries Monitoring Programme and the appointment of an Ecological Clerk of Works, specifically in overseeing the above monitoring programmes, is outlined within these conditions and that MD-SEDD is consulted on these programmes.

Wording suggested by MD-SEDD in relation to water quality, fish populations and fisheries for incorporation into planning consents:

1. No development shall commence unless a Water Quality and Fish Monitoring Plan (WQFMP) has been submitted to and approved in writing by the Planning Authority in consultation with Marine Directorate – Science Evidence Data and Digital (MD-SEDD) and any such other advisors or organisations.

2. The WQFMP must take account of the Scottish Government's MD-SEDD guidelines and standing advice and shall include:

a) water quality sampling should be carried out at least 12 months prior to construction commencing, during construction and for at least 12 months after construction is complete. The water quality monitoring plan should include key hydrochemical parameters, turbidity, and flow data, the identification of sampling locations (including control sites), frequency of sampling, sampling methodology, data analysis and reporting etc.;

b) the fish monitoring plan should include fully quantitative electrofishing surveys at sites potentially impacted and at control sites for at least 12 months before construction commences, during construction and for at least 12 months after construction is completed to detect any changes in fish populations; and

c) appropriate site specific mitigation measures detailed in the Environmental Impact Assessment and in agreement with the Planning Authority and MD-SEDD

3. Thereafter, the WQFMP shall be implemented within the timescales set out to the satisfaction of the Planning Authority in consultation with MD-SEDD and the results of such monitoring shall be submitted to the Planning Authority on a 6 monthly basis or on request.

Reason: *To ensure no deterioration of water quality and to protect fish populations within and downstream of the development area.*

Sources of further information

NatureScot (previously “SNH”) guidance on wind farm developments - https://www.nature.scot/professional-advice/planning-and-development/advice-planners-and-developers/renewable-energy-development/onshore-wind-energy/advice-wind-farm

Scottish Environment Protection Agency (SEPA) guidance on wind farm developments – https://www.sepa.org.uk/environment/energy/renewable/#wind

A joint publication by Scottish Renewables, SNH, SEPA, Forestry Commission Scotland, Historic Environment Scotland, MD-SECC (previously Marine Scotland Science) and Association of Environmental and Ecological Clerks of Works (2019) Good Practice during Wind Farm Construction - https://www.nature.scot/guidance-good-practice-during-wind-farm- construction.

Annex 1 (revised June 2023)

MD-SEDD – EIA Checklist

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

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

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

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

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