

Volume 1: Chapter 6 - Scope and Consultation

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6. SCOPE AND CONSULTATION

6.1 Introduction

- 6.1.1 An Environmental Impact Assessment (EIA) describes the likely significant effects of a proposed development on the environment, as required by the *EIA Regulations*¹. The scoping process enables the potential likely significant effects of the proposals to be identified. Although not a legislative requirement, scoping was identified as being a useful tool early in the project development process, as it provides key consultees with the opportunity to comment on the Proposed Development and its emerging likely significant environmental effects. Having regard to the requirements of Regulation 12(4) of the *EIA Regulations*, the list of organisations consulted for the Proposed Development included the EIA consultation bodies², statutory consultees³, non-statutory consultees and other public bodies⁴, to capture the views of as many stakeholders as possible. This provides a basis for ensuring the assessment of environmental effects is focused on issues of genuine potential significance and ensures that a proportionate approach to the EIA is undertaken. Stakeholder engagement is a key part of the EIA process and is important for the successful delivery of an application for a development of this nature. Consultation and engagement early in the process, as well as advice and input sought from key consultees, helps greatly to inform decisions about the design and scoping of the EIA for a proposed development.
- 6.1.2 This Chapter describes the EIA Scoping process, including consultation which was specifically undertaken to determine the scope of the EIAR, and the consultations that were undertaken more generally to inform the local community and other stakeholders of the progression at each key stage of the project. These took place both at the consultation stage to inform design, assessment and survey methods, and at the pre-application stage to inform the details of the Proposed Development in accordance with the *Energy Consents Unit Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989*⁵. Whilst consultation to inform the scope of the EIA and more general project consultation have been undertaken separately, feedback of relevance to the scope and content of the EIA from the general stakeholder engagement has been considered in the EIA process. The identification and environmental appraisal of corridor, route and alignment alternatives has also been informed by consultation as detailed further in **Volume 1, Chapter 4: Alternatives and the Routeing Process**. Additionally, a brief description of the environmental effects of potential significance associated with the Proposed Development which are addressed in detail in each of the Technical Chapters (**Volume 2**) is outlined in this Chapter, as well as those that have been scoped out from further assessment.

6.2 Consultation with the Local Community and Stakeholders

- 6.2.1 Throughout the evolution of the Proposed Development, SSEN Transmission has sought to maintain an open dialogue with stakeholders and local communities in proximity to the Proposed Development. This has included carrying out in-person consultation events in a series of locations during the corridor, route and alignment selection stages. Additionally, for those members of the public that could not attend the in-person events, the same information was presented within a virtual consultation room which could be accessed via the project website⁶. Consultation has involved engaging with statutory consultees, non-statutory consultees, community members and local organisations, as well as landowners and occupiers of

¹ HM Government, 2017. *The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017*. [Online] Available at: <https://www.legislation.gov.uk/ssi/2017/101/contents/made>.

² Consultation Bodies are defined in the *EIA Regulations* as the planning authority, Scottish Natural Heritage (now NatureScot), the Scottish Environment Protection Agency (SEPA) and Historic Environment Scotland (HES).

³ Statutory and non-statutory consultees are not defined by the *EIA Regulations*. SSEN Transmission has sought to consult with organisations of a statutory nature (for example community councils) and those of a non-statutory nature (e.g. environmental groups) who may have opinions or information of relevance to the EIA process.

⁴ Public bodies are defined in the *EIA Regulations* as “those which the Scottish Ministers consider are likely to have an interest in the proposed development by reason of that body’s specific environmental responsibilities or local and regional competencies”. HM Government, 2017. *The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017*. [Online] Available at: <https://www.legislation.gov.uk/ssi/2017/101/contents/made>.

⁵ The Scottish Government, 2022. *Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989*. [Online] Available at: <https://www.gov.scot/publications/good-practice-guidance-applications-under-sections-36-37-electricity-act-1989/>. Note that new guidance was issued by the Energy Consents Unit in May 2025. Consultation undertaken for this EIA preceded this guidance. Available at: [Electricity Act 1989 pre-application consultation and engagement guidance for electricity transmission line projects which require Environmental Impact Assessment](#).

⁶ SSEN Transmission, n.d. Kintore to Tealing 400 kV Overhead Line Project webpage. [Online] Available at: <https://www.ssen-transmission.co.uk/projects/project-map/kintore-tealing-400kv-ohl-connection/>.

property that may be impacted by the Proposed Development. These events have taken place at a formative stage of the proposals and the feedback has informed the further development of the proposals. Prior to these events, consultation materials containing specific options and/or proposals were published to allow consultees to provide a proper and informed response.

- 6.2.2 A Pre-Application Consultation Report (PAC Report) will be submitted, together with this EIAR, which will provide the details of the consultation events and engagement that have been undertaken. A summary of this is also provided below.
- 6.2.3 From May to July 2023, consultation was carried out and which sought to engage with all interested parties on the Preferred Corridor and the Preferred Routes identified for the OHL. The consultation process presented information on the options which had been appraised for the OHL corridor and route selection, and included information regarding the environmental, technical and cost considerations, the project development process, Corridor Options, and Route Options (in Sections A to F). This information was presented within separate Consultation Documents for the Corridor Selection Process⁷ and the Route Selection Process⁸.
- 6.2.4 In combination with the May to July 2023 consultation, complementary events for the associated proposed 400 kV substations were also undertaken; one proposed substation located near Tealing in Angus, and one proposed substation located near Fiddes in Aberdeenshire. It should be noted that during the May 2023 consultation the names of the proposed substations were Tealing and Fiddes. As the projects have evolved, the names of the proposed substations have changed to Emmock (to avoid confusion with the existing Tealing Substation) and to Hurlie (due to the change of substation location in Aberdeenshire and to avoid confusion with the existing Fetteresso Substation) respectively. Information regarding these projects, including the Consultation Documents, can be found on the Emmock⁹ and Hurlie¹⁰ substation project websites. Separate applications for planning permission for the two new substations have been submitted to the relevant Local Authorities (LAs) under the *Town and Country Planning (Scotland) Act 1997* (Emmock to Angus Council planning reference 24/00699/FULN and Hurlie to Aberdeenshire Council planning reference APP/2024/1951).
- 6.2.5 Following the close of the May to July 2023 consultation period, the feedback was analysed, and the substation site selection process was revisited. The site near Tealing in Angus was taken forward for design development and renamed as Emmock substation, however the preferred site in Aberdeenshire was changed from Fiddes to a new location in Fetteresso Forest called Hurlie near to the existing Fetteresso Substation. Subsequently, this necessitated revised OHL options, together with identification and appraisal exercises to be implemented in Section D and part of Sections E of the OHL Route. Following the identification and appraisal of these new Route Options, further consultation events were held on the Proposed New Route Options¹¹ from March to April 2024 following the publication of the *New Route Option Selection Consultation Document*¹². Additionally, a new Route Option in Section F was identified which combined less constrained elements of previously presented Route Options. The consultation materials also set out a series of 'Refined Routes' to update consultees on revisions made to the Preferred Routes in Sections A, B, C, E and F.
- 6.2.6 Following the close of the March to April 2024 consultation period, further Route Options were identified in Sections E and F in response to feedback from stakeholders on specific environmental and community sensitivities around the Drumoak area, and the Route Options to be taken forward to the alignment stage were confirmed. The Potential Alignment was subsequently

⁷ SSEN Transmission, 2023. *Consultation Document – Corridor Selection. Project Kintore-Fiddes-Tealing 400 kV Overhead Line Connection*. [Online] Available at: <https://www.ssen-transmission.co.uk/globalassets/projects/east-coast-phase-2-may-2023-docs/ohl-consultation-doc/consultation-document-corridor-selection---kintore-fiddes-tealing-400kv-ohl-connection-090523.pdf>.

⁸ SSEN Transmission, 2023. *Consultation Document – Route Selection. Project Kintore-Fiddes-Tealing 400 kV Overhead Line Connection*. [Online] Available at: <https://www.ssen-transmission.co.uk/globalassets/projects/east-coast-phase-2-may-2023-docs/ohl-consultation-doc/consultation-document---route-selection-may-2023.pdf>.

⁹ SSEN Transmission, n.d. Emmock 400 kV substation webpage. [Online] Available at: <https://www.ssen-transmission.co.uk/projects/project-map/emmock-400kv-substation/>.

¹⁰ SSEN Transmission, n.d. Hurlie 400 kV substation webpage. [Online] Available at: <https://www.ssen-transmission.co.uk/projects/project-map/hurlie-400kv-substation/>.

¹¹ It should be noted that this consultation period formally consulted upon the New Route Options in Sections D, E and part of F but also presented the 'Refined Routes' to provide an update on SSEN Transmission's work to date. Refined Routes were a result of the narrowing of the Proposed Routes to approximately 500 m wide as project development continued, within which an optimal alignment for the OHL could be identified.

¹² SSEN Transmission, 2024. *Consultation Document – New Overhead Line Routes*. [Online] Available at: <https://www.ssen-transmission.co.uk/globalassets/projects/kintore---tealing-400kv-ohl-downloads/march-2024-consultation-docs/kintore-to-tealing-consultation-document-new-route-selection-february-2024.pdf>.

developed and this was presented at consultation events held from September to October 2024 following publication of the Alignment Selection Consultation Document¹³.

- 6.2.7 Following the close of each consultation period, a Report on Consultation (RoC) was published which provided a summary of the consultation process and events, the key feedback received from consultees and stakeholders as well as SSEN Transmission's responses to the information received (see RoCs for the Corridor/Route Selection¹⁴, New Route Selection¹⁵, 11 and Alignment Selection¹⁶).
- 6.2.8 SSEN Transmission maintained an open dialogue with all Community Councils along the route and has sought to keep Council Members up to date on project progress and any upcoming consultation events. SSEN Transmission has also hosted a number of meetings with community forums which are detailed within the PAC Report which include, but are not limited to, the following as set out in **Table 6.1** below:

Table 6.1: Summary of Consultee Engagement

Date	Meeting Type	Stakeholder in Attendance
19 April 2023	Pre-Consultation Online Meeting for Local Ward Councillors	Local Ward Councillors, 39 invited and seven attended
25 April 2023	Pre-consultation Webinar for Community Councils	Local Community Councils, 27 invited and two attended
13 June 2023	Community Council requested in person public meeting	Arbuthnott Community Council and community members
14 June 2023	Community Council requested in person public meeting	Crathes, Drumoak and Durris Community Council and community members, 14 June 2023
19 June 2023	Community Council requested in person meeting	Royal Burgh of Forfar, Aberlemno and District and Kirriemuir Landward East Community Councils
19 June 2023	Community Council requested in person public meeting	Glamis and Area Community Council and community members
18 July 2023	Community Council requested in person public meeting	Culter Community Council and community members
20 September 2023	Call with the Project Manager	Royal Burgh of Forfar Community Council
23 January 2024	Community Council requested in-person public meeting	Crathes, Drumoak and Durris Community Council and community members
15 February 2024	Community Council requested in-person public meeting	Crathes, Drumoak and Durris Community Council and community members
29 February 2024	Pre-consultation webinar for Community Councils	Local Community Councils, 17 attendees over seven Community Councils

¹³ SSEN Transmission, 2024. *Consultation Document – Alignment Selection*. [Online] Available at: <https://www.ssen-transmission.co.uk/globalassets/projects/kintore---tealing-400kv-ohl-downloads/september-2024-consultation-docs/september-october-2024-alignment-consultation-document.pdf>.

¹⁴ SSEN Transmission, 2023. *Kintore to Tealing 400 kV Overhead Line. Report on Consultation*. [Online] Available at: <https://www.ssen-transmission.co.uk/globalassets/projects/rocs/tkup-ohl/report-on-consultation---kintore-to-tealing-400kv-ohl.pdf>.

¹⁵ SSEN Transmission, 2024. *Kintore to Tealing 400 kV Overhead Line. Report on Consultation*. [Online] Available at: <https://www.ssen-transmission.co.uk/globalassets/projects/rocs/tkup-ohl-august-24/report-on-consultation-august-2024.pdf>.

¹⁶ SSEN Transmission, 2025. *Kintore to Tealing 400 kV Overhead Line. Report on Consultation*. [Online] Available at: <https://www.ssen-transmission.co.uk/globalassets/projects/kintore---tealing-400kv-ohl-downloads/alignment-report-on-consultation/kintore-tealing-report-on-consultation-january-2025.pdf>

Date	Meeting Type	Stakeholder in Attendance
03 April 2024	Call with the Project Manager	Grampian Forest Rally
25 April 2024	Online Pre-Application meeting	Planning and Environment Department, Members of Aberdeenshire Council and statutory consultees
27 April 2024	Meeting	Infrastructure Services Committee Chair and Vice Chair, and representatives from Aberdeenshire Council planning team
28 April 2024	Meeting	Members of the Kincardine & Mearns Area Committee
28 August 2024	Pre-consultation webinar for Community Councils	Community Councils, 17 attendees over seven Community Councils
23 October 2024	Underground/technology choice webinar	External stakeholders
30 October 2024	Meeting	Angus Council Executive

6.3 EIA Scoping

6.3.1 An EIA Scoping Report was issued to the Energy Consents Unit (ECU) of the Scottish Government in September 2024 (see **Volume 5, Appendix 6.1: Scoping Report**). A Scoping Opinion¹⁷ was provided by the ECU on 19 December 2024 and is included in **Volume 5, Appendix 6.2: Scoping Opinion**.

6.3.2 The responses and requests contained within the Scoping Opinion were considered in detail during the EIA process. **Volume 5, Appendix 6.3: Consultation Matrix** of this EIAR includes details of the key issues that were raised during the Scoping consultation and how and where they are addressed within this EIAR. **Volume 5, Appendix 6.4: Gate Check 1 Report** contains the key issues raised within the Scoping Opinion by the ECU and where they are addressed within the EIAR.

6.4 Further Consultee Engagement

6.4.1 Consultee engagement has been ongoing throughout the different stages of the project and continued throughout the Scoping and EIA process. This engagement kept key EIA consultees updated on the project and allowed SSEN Transmission to agree important methodological issues for EIA related activities such as survey scopes and approaches, assessment methods, and approaches to mitigation. Consultees were also given the opportunity, following publication of specific proposals, to provide feedback on the corridor, route, alignment and design solution options identified, and all responses received were considered and summarised in the relevant RoCs (see **Paragraph 6.2.7**). **Volume 5, Appendix 6.3: Consultation Matrix** provides a summary of the key meetings and engagement that have been undertaken with consultees by the Applicant during the EIA stages of the project, which included but is not limited to those noted below in **Table 6.2: Summary of Further Consultee Engagement**.

Table 6.2: Summary of Further Consultee Engagement

Date	Meeting Type	Stakeholder in Attendance
5 December 2022	Meeting	SSEN Transmission 1 st Environmental Statutory Stakeholder Meeting
12 January 2023	Meeting	NatureScot
18 January 2023	Meeting	SSEN Transmission 2 nd Environmental Statutory Stakeholder Meeting
16 March 2023	Meeting	Historic Environment Scotland (HES)
21 March 2023	Meeting	NatureScot
28 March 2023	Meeting	SSEN Transmission 3 rd Environmental Statutory Stakeholder Meeting

¹⁷ The Scottish Government, 2024. Energy Consents Unit (2024) *Scoping Opinion on behalf of Scottish Ministers under the Electricity Works*. [Online] available at: <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00005225>.

Date	Meeting Type	Stakeholder in Attendance
18 August 2023	Meeting	HES
7 September 2023	Meeting	SSEN Transmission 4 th Environmental Statutory Stakeholder Meeting
8 November 2023	Meeting	SSEN Transmission 5 th Environmental Statutory Stakeholder Meeting
17 November 2023	Meeting	HES
22 February 2024	Meeting	SSEN Transmission 6 th Environmental Statutory Stakeholder Meeting
8 August 2024	Meeting	Scottish Environment Protection Agency (SEPA)
13 August 2024	Meeting	SSEN Transmission 7 th Environmental Statutory Stakeholder Meeting
15 August 2024	Meeting	NatureScot
10 September 2024	Site Visit	Aberdeenshire Council, HES, NatureScot
30 October 2024	Meeting	NatureScot and Aberdeenshire Council
27 November 2024	Meeting	Aberdeenshire Council/Aberdeen Council Archaeology Service (ACAS) and HES
12 December 2024	Meeting	SSEN Transmission 8 th Environmental Statutory Stakeholder Meeting
18 December 2024	Meeting	Angus Council
14 January 2025	Meeting	ACAS and HES
21 January 2025	Meeting	NatureScot
4 February 2025	Meeting	SEPA
9 July 2025	Meeting	SEPA

6.5 Gate Check 1

6.5.1 A Gate Check 1 Report was submitted to the ECU on 24 January 2025 and was issued by the ECU to key consultees on 7 February 2025 in accordance with the Scottish Government good practice guidance for gate checking procedures¹⁸. The purpose of the Gate Check 1 Report is to set out the consultations undertaken with statutory and non-statutory consultees, as well as engagement with the local community, and how the Applicant has dealt with matters raised during the Scoping process and which are detailed within the EIAR. A copy of the Gate Check 1 Report is provided in **Volume 5, Appendix 6.4: Gate Check 1 Report**. Key consultees were then invited to comment on the Gate Check 1 Report. Consultee responses to the Gate Check 1 Report are also summarised in **Volume 5, Appendix 6.3: Consultation Matrix** along with the actions taken to address the comments. Following the issue of the new 'Priority Applications for Transmission Infrastructure' guidance by the Scottish Government in February 2025, the Applicant has also had a Procedural Gatecheck meeting with the ECU.

6.6 Issues Scoped into Assessment

6.6.1 During the Scoping process, it was confirmed that the following topics required detailed assessment within the EIAR:

- Land Use – assessment of loss of prime agricultural land (**Volume 2, Chapter 7: Land Use and Prime Agricultural Land**).
- Forestry – direct effects on woodland loss to form an Operational Corridor for the OHL, and indirect effects from management felling (**Volume 2, Chapter 8: Forestry**). In the Scoping Report it was proposed that management felling

¹⁸ Scottish Government, Updated July 2022. *Energy Consents Unit. Good Practice Guidance for Applications under Section 36 and 37 to the Electricity Act 1989*. [Online] Available at: <https://www.gov.scot/publications/good-practice-guidance-applications-under-sections-36-37-electricity-act-1989/documents/>. Note that new guidance 'Priority Applications for Transmission Infrastructure guidance: Section 37 of the Electricity Act 1989' was published by the Scottish Government in February 2025. This was published after the Applicant had submitted the Gate Check 1 Report. Available at: <https://www.gov.scot/publications/priority-applications-transmission-infrastructure-guidance-section-37-electricity-act-1989/>

would not be scoped into the EIAR and while this approach was not disputed by the ECU in their Scoping Opinion, the Applicant has included within the scope of the EIAR an overview of the likely areas requiring management felling to provide an overview of the extent of felling required. It should be noted that the Applicant has no control over when management felling will take place and any felling of this nature will require separate permission under the *Forestry and Land Management (Scotland) Act 2018*.

- Landscape and Visual Amenity – effects on the physical landscape of the study area during construction and operation, effects on the landscape character of the study area during construction and operation, physical and perceptual effects on the key characteristics and special qualities of local landscape designations, effects on visual amenity experienced by receptors (people) within or moving around the study area (including residents in properties, settlements and communities, recreational receptors on core paths and at hill summits, and people travelling along roads) with reference to Visual Receptor Areas (VRAs) and representative viewpoints, during construction and operation, effects on the landscape character and views at night-time arising during the construction period of the Proposed Development, effects on residential visual amenity at the properties which are closest to the Proposed Development and cumulative effects on landscape character, landscape designations and visual receptors during both construction and operation.
- Cultural Heritage – direct effects of construction on cultural heritage assets that lie within the inner study areas, direct effects on buried archaeological remains that potentially survive within the inner study areas and cumulative effects during construction on cultural heritage assets within the inner study areas. During operation, effects on the setting of cultural heritage assets within the outer study area and cumulative effects on the setting of cultural heritage assets within the outer study area (**Volume 2, Chapter 10: Cultural Heritage**).
- Ecology – during construction, designated sites (i.e. Special Areas of Conservation (SACs), Ramsar sites and Sites of Special Scientific Interest (SSSIs)) for which a possible impact pathway has been identified, loss or fragmentation of habitats of conservation concern. Impacts on protected species including otter (*Lutra lutra*), bats (*Chiroptera*), beaver (*Castor fiber*), red squirrel (*Sciurus vulgaris*), pine marten (*Martes martes*), water vole (*Arvicola*) and badger (*Meles meles*) as a result of habitat loss or fragmentation and disturbance to aquatic environments that support populations of freshwater pearl mussel (*Margaritifera margaritifera*) and Atlantic salmon (*Salmo salar*) (**Volume 2, Chapter 11: Ecology**).
- Ornithology – during construction and operation, effects on designated sites, particularly Special Protection Areas (SPAs), for which qualifying features show connectivity (i.e. within 20 km for foraging goose species) and impacts on protected bird species, including Schedule 1/1A/A1 species and Red-List Birds of Conservation Concern (BoCC) arising from habitat loss, collision with the installed OHL and disturbance from construction works (**Volume 2, Chapter 12: Ornithology**).
- Hydrology, Hydrogeology, Geology and Soils – during construction, effects on surface and ground water quality, Private and Public Water Supplies, groundwater abstractions, Groundwater Dependent Terrestrial Ecosystems (GWDTEs), hydrology and peat and peat soils. During operation, effects on hydrology from the installed OHL infrastructure (flood risk) (**Volume 2, Chapter 13: Hydrology, Hydrogeology, Geology and Soils**).
- Traffic and Transport – during construction, effects on users of road networks associated with predicted construction traffic movements across the proposed study area (**Volume 2, Chapter 14: Traffic and Transport**).
- Noise and Vibration – during construction, noise and vibration effects (including from traffic where relevant) on sensitive receptors identified in proximity to construction working areas. Operational noise effects associated with OHL conductor noise for nearby sensitive receptors (**Volume 2, Chapter 15: Noise and Vibration**).
- Cumulative effects – those arising during construction and operation from in-combination effects predicted from other reasonably foreseeable projects, and those arising from interaction of predicted effects of the Proposed Development (**Volume 2, Chapter 16: Cumulative Effects**).

6.6.2 Within the above topics, some specific aspects and potential effects have been scoped out of the EIA. Full details of this are provided in Chapter 16 of the EIA Scoping Report (see **Volume 5, Appendix 6.1: Scoping Report**).

6.7 Issues Scoped out of Assessment

6.7.1 During the Scoping process, it was identified that a number of environmental topics do not require detailed assessment within the EIAR as it was considered that they are not likely to give rise to significant effects. These topics were referred to in the Scoping Report (see **Volume 5, Appendix 6.1: Scoping Report**) as topics to be scoped out from further consideration within the EIAR and they are discussed in this section. Generally, the Scoping Opinion supported the proposed scope of the EIA confirming in Section 3.5 that “*Scottish Ministers are satisfied with the scope of the EIA set out at Chapter 16 of the scoping report*”¹⁷.

- 6.7.2 The Scoping Opinion included responses from five Community Councils who raised some concerns regarding scoped out topics. Their responses identified that the Proposed Development could potentially impact other receptors including agriculture, tourism, property prices and local outdoor groups¹⁹. The potential impact on human health, particularly in relation to Electric and Magnetic Fields (EMFs), telecommunications signal coverage, the potential impacts on the mental health of local residents, and the carbon impact of the project were all raised. A full account of issues raised by the Community Councils is documented within **Volume 5, Appendix 6.3: Consultation Matrix**. The response to these concerns and justification for scoping these out of the EIAR are included in the discussion of scoped-out topics below. In relation to the responses from the Community Councils, the Scoping Opinion confirmed (in Section 3.19) that the issues raised that merited inclusion within the EIAR are addressed within the Scoping Opinion or through the responses of other stakeholders.

Population and Human Health

- 6.7.3 SSEN Transmission develops, builds and operates infrastructure to meet all applicable health and safety legislation, and guidance set by relevant bodies, principally the UK Government, Scottish Government, the Health and Safety Executive and the industry regulator, Ofgem. The requirements include those associated with EMFs.
- 6.7.4 In respect of EMFs, SSEN Transmission strictly follow the guidance as set by the UK Government, which in turn is informed by international guidance.
- 6.7.5 As well as setting exposure limits that protect against known, established effects of EMF, the UK Government's guidance²⁰ also includes precautionary measures to protect against possible effects below the exposure limits that have not been established by science.
- 6.7.6 In addition to this, the UK Health Security Agency and Department of Health have a remit to review new research in this area and ensure that current guidelines and policies are reflective of that research.
- 6.7.7 The UK Government's latest policy on EMF is set out in *National Policy Statement EN-5*, (NPS EN-5)²¹ which was reissued in November 2023 and came into force on 17 January 2024. This latest policy is reflective of that review process and in line with the NPS EN-5, the current UK Government guidance, informed by relevant international guidance, is therefore still considered appropriate by the UK Government and its public health experts. Whilst electricity consenting decisions are devolved to Scottish Ministers and the NPS EN-5 is therefore not all relevant in Scotland, SSEN Transmission can confirm compliance with all EMF guidance as set out in the NPS EN-5.
- 6.7.8 There have been over four decades of research looking into whether EMF can cause health effects and there are no scientifically proven effects below the exposure limits. When SSEN Transmission design OHLs, substations and cable installations, the design process is designed to ensure that exposure limits will not be exceeded, even when operating at 100% capacity. SSEN Transmission also seeks to ensure that necessary precautionary measures are also applied to the design where required.
- 6.7.9 In summary, the guidance the Applicant follows, which remains subject to ongoing review as required, ensures that safety measures will be applied to the Proposed Development. No significant environmental effects relating to EMFs are predicted.
- 6.7.10 With regard to the objections related to adverse effects on mental health, the Applicant is mindful of there being a level of uncertainty created by the consultation and consenting stages for the application process related to the Proposed Development. For this reason, SSEN Transmission aimed to balance the need for certainty and a swift application process whilst still providing sufficient opportunity for stakeholders to feed into the consultation processes during the design phases of the Proposed Development. There was an aim to identify options that provided an appropriate balance across a variety of constraints and interests. The corridor, route and alignment identification and appraisal processes were followed thoroughly, with every attempt being made to inform communities of the options being considered, and decisions being made at each stage. This was to ensure that ultimately the overall most appropriate Proposed Alignment for the Proposed Development was

¹⁹ To address this, a socio-economic report is submitted as part of the Section 37 application as a separate document to the EIAR.

²⁰ The UK Government, Updated 2019. *Electromagnetic fields*. [Online] available at: <https://www.gov.uk/government/collections/electromagnetic-fields>.

²¹ The UK Government, Updated 2024. *National Policy Statement for electricity networks infrastructure (EN-5)* [Online] Available at: <https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5>.

selected, having regard to the different environmental factors that required to be taken into account, together with competing technical and economic considerations.

- 6.7.11 The potential for significant effects on population and human health were considered in the Scoping Report in relation to a range of health determinants in addition to EMFs. An EMF Study Report has been submitted as part of the EIAR, and can be found in **Volume 5, Appendix 12.3 Annex 12.3.2**. No significant effects were predicted and it is not considered that reported mental health effects arising indirectly from uncertainty around the application process would give rise to significant human health effects.

Air Quality

- 6.7.12 During the construction phase there is potential for localised and temporary construction phase air quality effects as a result of localised mobilisation of dust from construction areas during dry weather conditions, and from construction Non-Road Mobile Machinery (NRRM) and road traffic exhaust emissions. It is considered that these will not be significant due to the short-term nature of the construction phase activities and on the assumption that they will be limited and controlled through Embedded and Applied Mitigation to avoid and minimise potential significant effects (see **Volume 2, Chapter 17: Schedule of Mitigation**).

Climate Change

- 6.7.13 In the context of the EIA process, significant effects as a result of the Proposed Development on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the Proposed Development to climate change were considered.
- 6.7.14 The Proposed Development would play an important role in facilitating the achievement of Scotland's national climate targets²² to become a net zero greenhouse gas (GHG) emitting nation by 2045, supporting the '*reducing greenhouse gas emissions*' policy action²³ and the 'Electricity' strategy as set out in the *Update to Scotland's Climate Change Plan*²⁴, as well as contributing to the UK's *Net Zero Strategy*²⁵.
- 6.7.15 The Proposed Development constitutes part of National Development 3 for '*Strategic Renewable Electricity Generation and Transmission Infrastructure*' within Scotland's fourth National Planning Framework (NPF4). It therefore benefits from strong in-principle support in NPF4²⁶ as a National Development and in *Policy 11(a)(ii) Energy* which supports development proposals relating to renewable technologies including enabling works such as transmission infrastructure.
- 6.7.16 A Climate Change Assessment (CCA) was undertaken for NPF4 as part of an Integrated Impact Assessment and reported in the Strategic Environmental Assessment (SEA) Report. A lifecycle GHG assessment was undertaken for the National Developments. This assessment concluded that, depending on the nature of the projects taken forward and considering both direct and indirect effects, National Developments of this type will likely have an overall net positive impact on achieving national greenhouse gas emissions reduction targets. The Proposed Development (as a National Development) would therefore likely have an overall net positive impact on achieving national GHG emissions reduction targets²⁷. The predicted adverse effects in relation to grid infrastructure are not predicted to be greater than Minor in significance. These effects relate to lifecycle emissions from carbon in embodied materials and components and from disturbance of carbon rich soils and vegetation that store or absorb significant amounts of carbon. Based on the GHG assessment of the National Development, and the summary of this in Annex B of the NPF4, grid transmission projects are identified as an overall and inextricable part of the renewable energy infrastructure required and collectively, they deliver (net) emissions reductions.

²² Scottish Government, 2019. *Climate Change (Emissions Reduction Targets) (Scotland) Act 2019*. [Online] Available at: <https://www.legislation.gov.uk/asp/2019/15>.

²³ Scottish Government, n.d. *Policy: Climate Change*. [Online] Available at: <https://www.gov.scot/policies/climate-change/>.

²⁴ Scottish Government, 2020. *Update to the Climate Change Plan 2018-2032: Securing a Green Recovery on a Path to Net Zero*. [Online] Available at: <https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/documents/>.

²⁵ UK Government, 2021. *Policy Paper – Net Zero Strategy: Build Back Greener*. [Online] Available at: <https://www.gov.uk/government/publications/net-zero-strategy>.

²⁶ Scottish Government, 2023. *National Planning Framework 4*. [Online] Available at: <https://www.gov.scot/publications/national-planning-framework-4/documents/>.

²⁷ Scottish Government, 2022. *National Planning Framework 4 – lifecycle greenhouse gas emissions: assessment findings*. [Online] Available at: <https://www.gov.scot/publications/national-planning-framework-4-lifecycle-greenhouse-gas-emissions-npf4-proposed-national-developments-assessment-findings/documents/>.

- 6.7.17 There will be embodied carbon emissions arising from the extraction, processing and manufacture, fabrication, transport to Site and any waste arisings of materials and components of the Proposed Development, including from any temporary structure used. However, the life cycle emissions associated with the infrastructure are not predicted to be significant in relation to the carbon saving potential of the Proposed Development and its contribution to carbon reduction targets at a national level.
- 6.7.18 Although land use change can contribute to baseline levels of GHG emissions, taking account of the land use and soils character which is predominantly arable and grazing land, and that peaty soils have generally been avoided and woodland loss associated with the OHL Operational Corridor has been minimised, these changes are not considered to be significant.
- 6.7.19 Some construction and operation emissions would occur through the production of carbon dioxide (CO₂) and nitrogen oxide (NO_x) emissions through transport and consumption of materials. Through the implementation of mitigation practices these are not considered to be significant.
- 6.7.20 With regards to project resilience, the Proposed Development will be designed and constructed in compliance with all relevant technical codes and standards to ensure that it is resilient to adverse weather. This includes proactive climate resilience assessments for adequate preparation, response and recovery from adverse climate events such as floods and storms.
- 6.7.21 Based on the preliminary assessment completed as part of the Scoping Report, the predicted effects of the Proposed Development on climate change mitigation and adaptation are not considered to be significant in the context of the EIA. Climate issues are therefore scoped out of the EIA.
- 6.7.22 A Peatland Carbon Emissions Assessment has been provided in **Volume 5, Appendix 6.5** of this EIAR in relation to peatland carbon emissions.

Major Accidents and Disasters

- 6.7.23 The EIA Regulations require an EIAR to consider the expected significant adverse effects of a development on the environment deriving from the vulnerability of the development to risks of major accidents and disasters.
- 6.7.24 Having considered the vulnerability of the Proposed Development to major accidents and disasters, the Applicant has identified that the potentially significant effects include severe weather events and the damage to the towers and OHL causing unplanned power outages, the potential for an increased risk to cause harm to people and the environment, as well as potential risks during the construction phase.
- 6.7.25 The risk of a major accident and disaster affecting the vulnerability of the Proposed Development is likely to be limited to those associated with unplanned power outages due to extreme weather or structural damage. Crisis management and continuity plans are in place across the SSE Group. These are tested regularly and are designed for the management of, and recovery from, significant energy infrastructure failure events for transmission assets.
- 6.7.26 The construction of the Proposed Development would be in accordance with the *Construction (Design and Management) (CDM) Regulations 2015*²⁸ *The Management of Health and Safety at Work Regulations 1999*²⁹, *The Workplace (Health, Safety and Welfare) Regulations 1992*³⁰ and *The Electricity at Work Regulations 1989*³¹. All relevant codes of practice will be implemented on-site by the Principal Contractors and sub-contractor(s) to ensure health and safety is managed effectively. The Proposed Development will also be constructed and operated in line with relevant design and safety codes including the Health and Safety Executive Guidance Notes GS6 'Avoiding danger from overhead power lines'³² and HSG47 'Avoiding danger from underground services'³³.

²⁸ UK Government, 2015. *The Construction (Design and Management) Regulations 2015*. [Online] Available at: <https://www.legislation.gov.uk/uksi/2015/51/contents>.

²⁹ UK Government, 1999. *The Management of Health and Safety at Work Regulations 1999*. [Online] Available at: <https://www.legislation.gov.uk/uksi/1999/3242/contents>.

³⁰ UK Government, 1992. *The Workplace (Health, Safety and Welfare) Regulations 1992*. [Online] Available at: <https://www.legislation.gov.uk/uksi/1992/3004/contents>.

³¹ UK Government, 1989. *The Electricity at Work Regulations 1989*. [Online] Available at: <https://www.legislation.gov.uk/uksi/1989/635/contents>.

³² Health and Safety Executive, 2013. *Guidance Note GS6 (Fourth edition): Avoiding danger from overhead power lines*. [Online] Available at: <https://www.hse.gov.uk/pubns/gs6.pdf>.

³³ Health and Safety Executive, 2013. *Guidance Note HSG47 (Third edition): Avoiding danger from underground services*. [Online] Available at: <https://www.hse.gov.uk/pubns/books/hsg47.htm>.

- 6.7.27 During design development, altitudes over 300 m above sea level have been avoided to reduce the extent of tower strengthening (and speed of refurbishment) required due to the higher potential for ice and high winds in such locations. During the Alignment design stage, a distance buffer of 170 m between the OHL and residential properties was maintained wherever possible, with a 100 m buffer the minimum distance achieved as far as possible, to reduce the potential for adverse effects on amenity of people and communities. Further information regarding design development is provided in **Volume 1, Chapter 4: Alternatives and the Routeing Process**.
- 6.7.28 There is the potential for an increased risk of road traffic accidents associated with increased construction vehicles, however an evaluation of this risk will be included in a Construction Traffic Management Plan (CTMP) and appropriate mitigation measures identified. This will be addressed in **Volume 2, Chapter 14: Traffic and Transport**.
- 6.7.29 The location of peat has been considered as part of the development design process and peat probing has been undertaken where required for the Proposed Development. The results of peat probing undertaken is detailed in **Volume 5, Appendix 13.3: Peat Depth Survey Report** of the EIAR, an outline Peat Management Plan is provided in **Volume 5, Appendix 13.4: Outline Peat Management Plan (OPMP)** of the EIAR, and a Peat Landslide Hazard Risk Assessment is provided in **Volume 5, Appendix 13.6: Peat Landslide Hazard Risk Assessment (PLHRA)**.
- 6.7.30 A Construction Environmental Management Plan (CEMP) will set out the good practice measures which will reduce the risk of a potential major accident or disaster occurring from a pollution event during construction or operation on sensitive receptors, including watercourses, habitats, protected species and public and Private Water Supplies (PWS). Other Chapters within this EIAR also consider this risk, including **Volume 2, Chapter 11: Ecology, Chapter 12: Ornithology and Chapter 13: Hydrology, Hydrogeology, Geology and Soils**.
- 6.7.31 The Proposed Development would not encourage large numbers of people to congregate during construction or operation which could increase the risk of transmission of any disease epidemic or pandemic. If an outbreak were to occur, public health measures and controls would be put in place.
- 6.7.32 With regards to acts of terrorism, the risk is considered to be low. However, SSEN Transmission would implement risk-assessed and appropriate public security protocols during the construction and operational phases, including the use of CCTV and temporary security fencing etc. during the construction phase. Once operational, the Proposed Development would be managed and maintained in accordance with SSEN Transmission's existing safety and security protocols for high voltage transmission lines.
- 6.7.33 The Proposed Development is not located within areas at risk of coastal flooding and as part of the development design process, areas of fluvial and surface water (pluvial) flooding have been avoided where possible. Effects on hydrology (flood risk) as a result of the Proposed Development are detailed in **Volume 2, Chapter 13: Hydrology, Hydrogeology, Geology and Soils**.
- 6.7.34 Significant adverse effects on structural, human and environmental receptors are experienced as a result of extreme storms, and 'low pressure systems' (gusts from storms and gales originating from hurricanes and deep climatic depression) are experienced frequently in Scotland. Weather warnings issued by the Met Office and SEPA on adverse weather conditions will be considered during construction and operation of the Proposed Development, and safety and management procedures will be implemented to mitigate any effects caused by severe storms and gales during the construction phase. Additionally, the design of the Proposed Development will adhere to relevant structural guidance to minimise any risks of major accidents in the event of an OHL tower collapse.
- 6.7.35 Based on UK climate projections, hotter and drier Summers as well as warmer and wetter Winters are anticipated. Warmer temperatures may lead to an increased risk of overheating and occurrence of sub-zero temperatures can cause disruptions to human receptors. To reduce the risks from extreme temperatures to employees during the construction period and maintenance, measures will be implemented to comply with the *Construction (Design and Management) (CDM) Regulations 2015*²⁸. Droughts are also expected to become increasingly common. Drought planning is undertaken by SEPA and Scottish Water and the management plans and strategies will be informed by warnings from these organisations during the construction and operation period.
- 6.7.36 Potential significant effects relating to the vulnerability of the Proposed Development to accidents and disasters are not predicted to be significant and this topic is therefore scoped out of the EIA.

Telecommunications and Aviation

- 6.7.37 The Proposed Development will be operated and maintained in accordance with relevant procedures and agreements to avoid the potential for interference of the electrical circuits with other utility and telecommunications operators. The operation of high voltage OHLs generates EMFs at a frequency of 50 Hz. The Proposed Development would emit extremely low frequency (ELF) EMF which do not interfere with the higher frequencies used in radio and television transmission. If a structure were to be blocking the line of sight for the communications links, interference could be expected. However, throughout the Alignment development process the Applicant has engaged with the various communications consultees and, where required, towers have been microsituated outside of the area of concern. Any locations that have not already been identified and are subsequently identified during the application process for the necessary statutory consents, will be addressed by the Applicant with the relevant communications consultees to ensure there would be no significant interference.
- 6.7.38 As regards to aviation, the National Air Traffic Services (NATS) has confirmed that aviation does not need to be scoped in as none of the towers are in close proximity to NATS installations. An Aviation Impact Assessment has been carried out and the Applicant has engaged with the various operators of safeguarded civilian airports and military airfields throughout the Alignment development process and no concerns have been raised.
- 6.7.39 While discussions between the Applicant and aviation and telecommunications statutory consultees are ongoing, it is not predicted that the Proposed Development would cause any significant technical issues with telecommunications, television and radio broadcasting or aviation systems interference, and therefore this issue is scoped out of the EIA with the exception of an assessment of the direct effects of the Proposed Development on recreational airfields which is presented in **Volume 2, Chapter 7: Land Use and Prime Agricultural Land**. An Aviation Impact Assessment has been provided in **Volume 5, Appendix 7.2**.

Socio-Economics

- 6.7.40 The Proposed Development is expected to provide substantive support to the economy of Scotland in terms of direct and indirect employment and business investment, with wider economic benefits, including the facilitation that the Proposed Development provides to large scale deployment of renewable electricity generation in the north of Scotland. This is also supported by its status as a National Development 3 (ND3) "Strategic Renewable Electricity Generation and Transmission Infrastructure" in NPF4.
- 6.7.41 A stand-alone Socio-Economic Assessment accompanies the Section 37 application which demonstrates how the Proposed Development aligns with national and local development policy and outlining the predicted socio-economic impacts of the development.

Decommissioning

- 6.7.42 The Proposed Development would not have a fixed operational life. The effects associated with the construction phase can be considered to be representative of worst-case decommissioning effects, and therefore no separate assessment on decommissioning has been undertaken as part of this EIAR. However, an outline mitigation strategy for decommissioning has been provided as **Volume 5, Appendix 3.6: Outline Decommissioning Mitigation Strategy** to inform such future requirements and to help avoid the potential for significant effects associated with this project stage.

6.8 Other Issues

- 6.8.1 The *EIA Regulations* set out a number of factors to be considered within an EIAR; specifically, those factors listed under Regulations 4(3) and 4(4), and Schedule 4. **Table 6.3: Assessment of Factors Identified in Regulations 4(3), 4(4) and Schedule 4** describes how this EIAR has addressed these factors.

Table 6.3: Assessment of Factors Identified in Regulations 4(3), 4(4) and Schedule 4

Topic	Potential for Significant Effects
Population and Human Health	Potential effects relating to population and human health have potential to arise from EMF, air quality, noise and/or vibration effects. Such effects are deemed to be Not Significant and are scoped out of detailed assessment as discussed in Section 6.7 of this Chapter.

Topic	Potential for Significant Effects
Biodiversity ³⁴	The potential effects on the biodiversity are considered in Volume 2, Chapter 11: Ecology and Volume 5, Appendix 11.5: Outline Biodiversity Enhancement Plan , which includes as an Annex, a Biodiversity Net Gain Assessment Report.
Land (and natural resources availability)	The potential effects on the land as an agricultural resource are considered in Volume 2, Chapter 7: Land Use and Prime Agricultural Land along with direct effects of the Proposed Development on recreational airfields and recreational fisheries.
Soil (and natural resources availability)	The potential effects on the geological receptors, peat and groundwater are considered in Volume 2, Chapter 13: Hydrology, Hydrogeology, Geology and Soils .
Water (and natural resources availability)	The potential effects on the water environment are considered in Volume 2, Chapter 13: Hydrology, Hydrogeology, Geology and Soils .
Air and Climate	The potential effects on air quality and climate change are deemed to be Not Significant and are scoped out of detailed assessment as discussed in Section 6.7 of this Chapter.
Cultural Heritage (material assets)	The potential effects on Cultural Heritage assets are considered in Volume 2, Chapter 10: Cultural Heritage .
Landscape (material assets)	The potential effects on Landscape are considered in Volume 2, Chapter 9: Landscape and Visual Amenity .
Interaction Between Factors (Cumulative effects)	The approach to cumulative effects is outlined within Volume 1, Chapter 5: EIA Process and Methodology . It is considered within each of the technical Chapters in Volume 2 where relevant and is also detailed within a stand-alone Chapter (Volume 2, Chapter 16: Cumulative Effects).

³⁴ Particularly species and habitats protected by *Council Directive 92/43/EEC* on the conservation of natural habitats and of wild fauna and flora, and *Directive 2009/147/EC* of the European Parliament and of the Council on the conservation of wild birds.