

## **Volume 5: 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**

**Kintore to Tealing 400 kV Overhead Line  
Scottish Hydro Electric Transmission Plc**

**19 December 2024**

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## 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 SC189126 and having its registered office at Inveralmond House, 200 Dunkeld Road, Perth, PH1 3AQ (“the Company”) in response to a request dated 05 September 2024 for a scoping opinion under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 in relation to the proposed Kintore to Tealing 400 kV Overhead Line (“the proposed Development”). The request was accompanied by a scoping report.

The proposed Development would comprise a new 400kV overhead line (“OHL”) running between a new substation at Emmock, near Tealing in Angus via a new substation at Hurlie near Fiddes, to the existing substation at Kintore, Aberdeenshire. The proposals are for approximately 106km of new 400kV double circuit OHL carried on steel lattice towers of average height of 57m and average spans of 350m between towers.

1.2 In addition to the OHL there will be ancillary infrastructure including:

- Formation of bellmouths for access tracks to connect with public roads;
- Construction of temporary and permanent access tracks;
- Temporary working areas;
- Other construction compounds; and
- Borrow pits to provide stone for access tracks.

1.3 The Company indicates the proposed Development would not have a fixed operational life and would be decommissioned after 50 years or more and the site restored in accordance with the decommissioning and restoration plan.

1.4 The proposed Development is solely within the planning authority of Angus Council and Aberdeenshire Council.

## 2. Consultation

2.1 Following the scoping opinion request a list of consultees was agreed between Scottish Hydro Electric Transmission Plc (acting as the Company's agent) and the Energy Consents Unit. A consultation on the scoping report was undertaken by the Scottish Ministers and this commenced on 18 September 2024. The consultation closed on 09 October 2024. Extensions to this deadline were granted to Aberdeen City Council, HES, Inveresk Community Council and Mearns Community Council. 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:

Aberdeen City Council, Alyth Community Council, Arbuthnott Community Council, Auchterhouse Community Council, Brechin Community Council, Catterline, Kinneff & Dunnottar Community Council, Civil Aviation Authority, Cluny, Midmar & Monymusk Community Council, Culter Community Council, District Salmon Fishries Board - Dee DFSB (Aberdeenshire), District Salmon Fishries Board - Esk DFSB, District Salmon, Fishries Board - Tay DDSFB, Dundee Airport, Dundee City Council, Echt & Skene Community Council, Errol Community Council, Feughside Community Council, Fisheries Management Scotland, Fisheries Trust Scotland - River Dee Trust, Fisheries Trust Scotland - Tay Foundation, Fisheries Trust Scotland - The Esks, Rivers & Fisheries Trust, Glamis Community Council, Inchtute Community Council, John Muir Trust, Kemnay Community Council, Kintore Community Council, Kirriemuir Landward East Community Council, Longforgan Community Council, Maritime and Coastguard Agency, Meigle & Ardler Community Council, Mountaineering Scotland, Muirhead, Birkhill & Liff Community Council, National Grid, Newtyle & Eassie Community Council, NFUS, RSPB Scotland, Saint Cyrus Community Council, Scottish Canoe Association, Scottish Forestry - Perth and Argyll Scottish Gas Networks (SGN), Scottish Rights of Way and Access Society (ScotWays), Scottish Wild Land Group (SWLG), Scottish Wildlife Trust, SEPA South Stonehaven & District Community Council, Strathmartine Community Council, Sustrans Scotland, Visit Scotland, West Carse Community Council, West of Scotland Archaeology Service and Westhill & Elrick 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, and Aberdeenshire Council (within whose area the proposed Development would be situated), NatureScot, the 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 05 September 2024 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, and Aberdeenshire Council for publication on their website. It has also been published on the Scottish Government energy consents website at [www.energyconsents.scot](http://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 Chapter 16 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 provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via [EIA@scottishwater.co.uk](mailto:EIA@scottishwater.co.uk)) and makes further enquires to confirm whether there any 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.

3.9 Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provide generic scoping guidelines for overhead line development

[https://www2.gov.scot/Topics/marine/Salmon-](https://www2.gov.scot/Topics/marine/Salmon-TroutCoarse/Freshwater/Research/onshoreren)

[TroutCoarse/Freshwater/Research/onshoreren](https://www2.gov.scot/Topics/marine/Salmon-TroutCoarse/Freshwater/Research/onshoreren) which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm or overhead line development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

3.10 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.

3.11 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.

3.12 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.

3.13 The scoping report identified viewpoints at Table 5.1 to be assessed within the landscape and visual impact assessment. See Guidance note on options for this section.

3.14 The Scottish Ministers note in the Scoping Report the Company states there is no requirement for the OHL towers to be lit at night. The Scottish Minister would however recommend that when the Company undertakes further consultation on this issue then it considers the proximity to flight paths, local air traffic, and landscape impact. The Scottish Ministers advise using low-intensity, directional lights wherever feasible to reduce environmental disturbance, while ensuring compliance with CAA and MOD standards. It is important to evaluate the need for obstruction lighting on tall structures. It is noted that the Company's consultation to date with relevant stakeholders has identified that there are no significant concerns in relation to technical safeguarding for national en-route air traffic control. However, consultation will be continued through the EIA and pre-application process with aviation organisations to ensure that the proposals are designed, constructed and operated to avoid adverse impacts.

3.15 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, RSPB and NatureScot.

3.16 As detailed in Section 2.8.5 materials will be obtained from on-site borrow pits or imported from local quarries. The EIA Report should include detailed information regarding their location, size, and nature. And also include details of the proposed depth of the excavation compared to the actual topography and water table, proposed drainage and settlement traps, turf and overburden removal and storage for reinstatement, and details of the proposed restoration profile. The impact of such facilities (including dust, blasting and impact on water) should be appraised as part of the overall impact of the working. The Construction Traffic Management Plan should evaluate and include potential cumulative impacts associated with the proposed Development and other consented developments in the area to ensure cumulative impacts and borrow pit use to source local materials are considered, and also that the sharing of borrow pit locations are properly considered in order to reduce traffic.

3.17 The Scottish Ministers recommend that potential impacts of construction and completed development on safe and efficient operation of the railway are assessed. This includes conducting a Traffic Assessment and providing details of proposed construction and engineering works near the railway, as detailed in Network Rail's Scoping response.

3.18 With regards to Socio-Economics, the Scottish Ministers note that Socio-Economics will be scoped out of the EIA, however the Company have confirmed it will provide a stand-alone Socio-Economics report. The Scottish Ministers would therefore recommend that in the stand-alone report the proposed Development should be appropriately and fully assessed on both a national and local scale, with consideration of the relevant Planning Authority Development Plans. The Scottish Ministers also request the submitted report estimates who may be affected by the proposed Development, in all or in part, which may require individual households to be identified, local communities or a wider socio-economic grouping such as tourists and tourist related businesses, recreational groups, attractions and events. The Socio Economic report should also include relevant economic information connected with the proposed Development, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the proposed Development. This should set out the impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy.

3.19 Responses from the Community Councils have been considered, and it has been determined the issues raised by Community Councils that merit inclusion within the EIAR are either addressed through this scoping opinion, or responses by other stakeholders.

3.20 Regarding cumulative assessment, it is recommended by the Scottish Ministers that in order to assess the full environmental impact of the Development, the Company include within the cumulative impact assessment, OHL and Substation infrastructure that is associated with SSEN Transmission ASTI projects.

3.21 The assessment on archaeology and cultural heritage impacts should be carried out in line with relevant legislation and standards as detailed in section 6 of the scoping report, and should also include the recommendations by HES, Angus Council, and Aberdeenshire Council within their own consultation responses.

3.22 It is recommended by the Scottish Ministers that an assessment be undertaken and included within the EIAR to predict noise levels internally at noise sensitive receptors during the operation phase.

3.23 The proposed Development must be designed in compliance with the ICNIRP Guidelines, and also the UK Government's Code of Practice entitled "Power Lines: Demonstrating compliance with EMF public exposure guidelines" which implements the policy to comply with the ICNIRP guidelines. The Company's approach to design also takes into account their statutory requirements in relation to the minimum height of overhead lines and ground clearance, and the position, insulation, and protection of OHLs to ensure compliance with the Electrical Safety, Quality and Continuity Regulations 2002. The Scottish Ministers note that a separate human health and population impact assessment chapter will not be presented in the EIAR, however welcome the Company's commitment to provide a separate report alongside the EIAR demonstrating the compliance of the electricity transmission systems for the proposed Development with the UK guidelines on EMF exposure.

3.24 The inclusion of a specific Forestry Chapter within the EIAR is welcomed. The Scottish Ministers recommend this Chapter should commit to compensatory planting, however it is understood that detailed information on compensatory planting sites may not be fully known at this stage and are therefore not required to be included in the EIAR. It is also recognised that other offsite planting and biodiversity measures are not able to be included within the EIAR with certainty as these are subject to landowner agreement.

3.25 The Scottish Ministers consider the assessment scope and methodology of the Traffic and Transport Chapter to be acceptable. It is noted that consultation responses, together with feedback awaited from the relevant local authority roads departments, will be addressed in the Chapter. The traffic and transport assessment to be presented in the EIAR will also take account of any further relevant guidance and standards advised by the local roads and planning authorities. It is recognised that detailed specifics of Public Road Improvement Works will not be available at the time of the EIAR, however it is expected the Company will be able to include within the EIAR descriptions of the works supported by maps showing indicative locations.

3.26 The Scottish Ministers request that 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.

3.27 Scottish Ministers also 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.

3.28 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).



**Alan Brogan**  
**Energy Consents Unit**  
**19 December 2024**

## **ANNEX A**

### **Consultation**

#### **List of consultees who provided a response.**

- Aberdeenshire Council
- Angus Council
- HES
- NatureScot Central
- NatureScot North
- SEPA North
- Aberdeen Airport
- Aberlemno & District Community Council
- British Horse Society
- BT
- Cairngorms National Park Authority
- Crathes, Drumoak & Durriss Community Council
- Crown Estate Scotland
- Defence Infrastructure Organisation
- Inveresk Community Council
- Joint Radio Company (2 responses – 12/11/2024)
- Mearns Community Council
- NATS Safeguarding
- Network Rail
- Scottish Water
- Tealing Community Council
- The Coal Authority
- The Met Office
- Woodland Trust

Internal advice from areas of the Scottish Government was provided by officials from Transport Scotland, Scottish Forestry – Grampian and Marine Directorate (in the form of standing 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

Our Ref: ENQ/2024/1397  
Your Ref: ECU00005225

Ask for: Stephanie McMillan  
Tel: 01467 468676  
Email: [REDACTED]

The Scottish Government  
Energy Consents Unit

15 October 2024

Dear Sir/Madam

## **The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017**

### **Consultation in respect of an EIA Scoping Opinion for Tealing to Kintore 400kV Overhead Line Associated Substations and Ancillary Development including Access and Constructions Compounds.**

I refer to your request for a scoping opinion for the above proposal. I am in receipt of all necessary information and can now offer a response to this consultation. The request from the Scottish Government's Energy Consents Unit seeks consultation with Aberdeenshire Council as Local Planning Authority and statutory consultee.

A scoping report and figures have been provided by the developer, Scottish and Southern Electricity Networks Transmission (SSENT), for consideration. Advice is sought relating to the content of a future environmental assessment, whether any further matters would like to be highlighted for consideration and inclusion in the assessment, particularly site-specific information.

Aberdeenshire Council's Planning Service has undertaken consultation with internal consultees. Aberdeenshire Council has been consulted due to its role as Local Planning Authority and as such, the views offered in this response relate primarily to land use planning. Internal consultation has been undertaken with the following teams: Archaeology, Built Heritage, Contaminated Land, Environmental Health, Flood Risk and Coastal Protection, Natural Heritage and Roads Development, in addition to a Landscape Consultant on behalf of the Planning Service. Consultation with external/statutory consultees is outwith the remit of the Planning Service at the scoping stage although once an application for Section 37 consent is sought, the views of these consultees may also feed into the consultation response from Aberdeenshire Council, if appropriate.

#### **1. Chapter 4. Land Use and Recreation**

- 1.1. The following has been provided in consultation with the Council's Natural Environment Team.
- 1.2. It is noted that there is potential for significant effects on Recreation but that these effects are scoped out to be covered by embedded and applied mitigation measures, including the provision of an Access Management Plan.
- 1.3. The inclusion of a chapter specifically considering forestry is welcomed.

- 1.4. It is noted that the scope will not include any felling and management required outside the Operational Corridor (OC) and that any felling and forestry management required outside the OC will be carried out by agreement with relevant landowners and under Scottish Forestry procedure.
- 1.5. [Tree Preservation Orders](#) (TPOs) do not appear on any constraints map and need to be considered. They are unlikely to be a major constraint, but ACO TPO 20 Easthills appears to be within the OC. Furthermore, TPOs at Luthermuir, Durris and Drumock are close to the proposed route and should be noted in the case of further route changes.

## 2. Chapter 5. Landscape and Visual Amenity

- 2.1. Consultation comments on landscape and visual matters were provided in July 2023. The following issues were raised in these comments which have relevance to our review of the Scoping Report:
  - Considerations given to alternatives to the overhead line are not balanced in that the disadvantages of undergrounding the line are set out in full but not the advantages (both environmental and technical). It was recommended that thorough consideration should be given to undergrounding sections of the line to minimise effects on the most sensitive landscape and visual interests.
  - The Braes of Mearns SLA is a principal constraint with potential effects on the integrity of the distinctive pattern of policy woodlands around Fettercairn, the setting of this settlement and nearby designed landscapes a key concern. Views from well-known viewpoints within the SLA and views (both from within and outside the SLA) where the appreciation of the contrast between the Highland Boundary Fault and the Howe of Mearns is strongest are also sensitive to a development of this scale and nature.
  - Careful routing of the line will be needed to minimise effects on the special qualities of the Dee Valley SLA including the integrity of woodland on valley sides and along the river's banks and views and landscape perception experienced from recreational routes along the Dee.
  - We expressed the view that landscape mitigation and enhancement measures should form a key part of the proposals. These should include off-site woodland and hedgerow planting to assist with screening from roads and residential properties.
- 2.2. The Scoping Report sets out the methodology and approach that will be adopted when undertaking the Landscape and Visual Impact Assessment (LVIA) of the proposal. It is confirmed that the proposed methodology and the scope of the landscape and visual interests to be considered in the LVIA is satisfactory. We welcome the opportunity to agree final representative assessment viewpoints as noted in paragraph 5.4.3 of the Scoping Report.
- 2.3. It is noted in paragraph 5.5.5 that the applicant intends to consider 'Additional Mitigation' following further assessment work where this could potentially mitigate significant landscape and visual effects. We would reiterate our request that not just landscape mitigation of the effects of the proposal should be considered but also wider landscape and biodiversity enhancement measures in accordance with the requirements of NPF4. Similarly, the location, design and composition of compensatory planting should be carefully considered given the likely removal of woodland on the route of the overhead line

(as shown in the Ecological Designations and Forestry figures which accompany the Scoping Report).

### **3. Chapter 6 Cultural Heritage**

- 3.1. The following information has been provided by the Council's Archaeology Team and Built Heritage Team.
- 3.2. In terms of Archaeology, it is generally agreed that proposed scope and assessment methodology is acceptable. However, should compensatory planting be proposed, these areas should be included in the Cultural Heritage Assessment.
- 3.3. In relation to Built and Cultural Heritage, all designated historic assets should be clearly identified and that both views from and to any designated historic asset must be considered.
- 3.4. Given the significance of Castle Fraser and its apparent physical proximity to a possible route, clearly demonstrate how landscape prevents any impact on its setting.
- 3.5. The setting of a built heritage designation may often be important in contributing to the character and special interest of that asset and how it is experienced and appreciated by both the local and wider communities. As such it is essential that we take into consideration the backdrop of conservation areas, designed landscapes and listed buildings when evaluating the potential impact of any future development. The fundamental assumption is to ensure that any proposal does not undermine or compromise any important views of nationally designated historic assets or impact on their immediate surroundings.
- 3.6. Links to supporting documentation can be found in the full response from Built Heritage in the appendix.

### **4. Chapter 7 Ecology and Chapter 8 Ornithology**

- 4.1. The following information has been provided in consultation with the Council's Natural Environment Team.
- 4.2. In terms of key habitats and species detailed in paragraphs 7.2.3 and 7.3.1., please add consideration of NESBiP Locally Important Species, which can have very localised distribution. NESBReC hold data for the species on these lists where records are available. Noting that field survey is to be completed during 2024, we would expect the EclA to include consideration of this data from NESBReC and assess (i.e. include in 7.7) any potentially significant effects.
- 4.3. In relation to Table 7.1, key habitats taken from the SB list appears incomplete for the habitats potentially relevant. Acid grass land and upland birch are both present on LNCS sites within the route corridor. The habitat list should perhaps be revisited.
- 4.4. Links to supporting information for the above can be found in the Appendix.
- 4.5. There are no comments specifically in relation to ornithology; the range and scope of ornithological surveys appears to be acceptable.

### **5. Chapter 9 Hydrology, hydrogeology, geology and soils**

- 5.1. The following has been provided by the Council's Flood Risk and Coastal Protection Team.

- 5.2. Flood Risk is not definable at this stage, but drainage details and flood risk assessments may/will need to be provided to demonstrate how surface water will be managed depending on the final locations of site works.

## **6. Chapter 10 Traffic and Transport**

- 6.1. The following information has been provided in consultation with the Council's Roads Development Team.
- 6.2. Roads Development have previously commented on the previous enquiry and have met with Contractors.
- 6.3. Access to the proposal will be via many roads within Aberdeenshire, these roads will have contrasting road makeup and road widths, as part of any subsequent applications full details should be provided of construction traffic to each site from the adjoining trunk road network. Full details should be provided of the following, vehicle types and frequency of the access and egress, junction dimensions, drainage, gradients, materials, swept path analysis, visibility splays, and proposed construction traffic routes. The internal construction traffic route should be detailed from the public road including the turning and passing provisions.
- 6.4. Full details of how the construction traffic interaction with the existing public roads will be managed, passing provision, visibility windows, road widening, and any associated improvements should be provided. An appraisal of the roads from the trunk road network will also be required as part of any future applications.
- 6.5. Parking will be required within each site as appropriate during the construction period, following delivery parking provision will be required in perpetuity for operation and maintenance as appropriate to the specific piece of infrastructure. This information should be detailed as part of any formal Planning application.
- 6.6. The applicant should engage with Roads Development via the Planning Service in advance of any future applications as appropriate, this will allow an opportunity to discuss further detail as it is established.

## **7. Chapter 11 Noise and Vibration**

- 7.1. The Council's Environmental Health Team has reviewed Chapter 11 and has provided the following response.
- 7.2. As part of the methodology statement there does not appear to be any proposal to predict noise levels internally at noise sensitive receptors. This service has received complaints about existing 400kV upgrades to overhead power lines (OPL) and this is mainly attributed to indoor noise levels at night from the OPL. It was advised previously that an indoor noise criteria of NR25 daytime and NR20 night-time at noise sensitive premises would need to be applied. This would still be the position of this service. If the final noise impact assessment excludes this, this will likely mean this service will have to object to the proposal on the grounds of insufficient information. The other parts of the 'noise and vibration' chapter of the EIA are satisfactory.
- 7.3. The indoor noise criterion would also need to consider the cumulative impact from other electrical infrastructure that is either under consideration in the planning system or

already has consent. This would include Battery Energy Storage, sub stations, transformers etc

## **8. Chapter 12 Population and Human Health**

- 8.1. It is noted that Population and Human Health have been scoped out the EIAR and that a separate report will be provided to show the findings of the Applicant's calculations to confirm compliance with the EMF exposure guidelines set out in the UK Code of Practice.
- 8.2. Whilst this is accepted, it is noted that that concerns have already been raised regarding the human health impacts relating to electric and magnetic fields It is therefore imperative a clear rationale for scoping out this issue should be included within the EIA and/or elsewhere within supporting information accompanying the application for Section 37 Consent to the Scottish Government's Energy Consents Unit for the purpose of clarity.

## **9. Chapter 13 Air Quality, Chapter 14 Climate Change, Chapter 15 Major Accidents and Disasters**

- 9.1. It is agreed that the above issues are to be scoped out of further assessment within the EIA. It is drawn to the attention of the developer however, that the clear rationale for scoping out these issues should be included within the EIA and/or elsewhere within supporting information accompanying the application for Section 37 Consent to the Scottish Government's Energy Consents Unit for the purpose of clarity.

## **10. Conclusion**

- 10.1. The above forms the consultation response from Aberdeenshire Council's Planning Service to the Scottish Governments Energy Consents Unit, the determining authority for any future application. During the consideration of any future consultation relating to an application for Section 37 Consent, other issues may become obvious following public consultation (by the determining authority) and consultation with internal consultees.
- 10.2. The Planning Service welcomes continued engagement at the pre-application stage with the developer.
- 10.3. This opinion will be held for public inspection for a two year period, or until a planning application is submitted at which time the opinion will be transferred to the planning register with the application.

Yours faithfully

REDACTED

Paul Macari

Head of Planning and Economy

## Appendix

**Natural Environment Team Enquiry Consultation Response**

Planning Reference No:	Enq/2024/1397
Environment Planner:	EW/JC
Date of Response:	30/9/2024

## EIA Scoping request – Kintore to Tealing

Issue 1:	Recreation
Actions:	
a)	Noted that there is potential for significant effects on Recreation but that these effects are scoped out to be covered by embedded and applied mitigation measures, including the provision of an Access Management Plan.
Supporting Information:	

Issue 2:	Forestry and Tree (TPOs)
Actions:	
a)	Noted that scope will not include any felling and forestry management required outside the OC and that any felling and forestry management required outside the OC will be carried out by agreement with relevant landowners and under SF procedure.
b)	TPOs do not appear on any constraints map and need to be considered. They are unlikely to be a major constraint but ACO TPO 20 Easthills appears to be within the OC. TPOs at Luthermuir, Durris and Drummock are close to the proposed route and should be noted in the case of further route changes. See below.
c)	
Supporting Information:	
Aberdeenshire TPOs - <a href="https://www.aberdeenshire.gov.uk/environment/natural-heritage/trees/#:~:text=Trees%20are%20protected%20in%20several%20different%20ways.%20by:%20You%20can">https://www.aberdeenshire.gov.uk/environment/natural-heritage/trees/#:~:text=Trees%20are%20protected%20in%20several%20different%20ways.%20by:%20You%20can</a>	

Issue 3:	Ecology
Actions:	

a)	<p>7.2.3 and 7.3.1 – Key habitats and species. Please add consideration of NESBiP Locally Important Species, which can have very localised distribution. See links below.</p> <p>NESBReC hold data for the species on these lists where records are available. Noting that field survey is to be completed during 2024, we would expect the EclA to include consideration of this data from NESBReC and assess ( i.e. include in 7.7) any potentially significant effects.</p>
b)	<p>Table 7.1 – Key habitats taken from the SB list appears incomplete for the habitats potentially relevant. Acid grassland and upland birch are both present on LNCS sites within the route corridor. Habitat list should perhaps be revisited.</p>
c)	
<p>Supporting Information:</p> <p>Locally Important species list - <a href="https://www.nesbiodiversity.org.uk/biodiversity-information-for-developers/important-local-species/">https://www.nesbiodiversity.org.uk/biodiversity-information-for-developers/important-local-species/</a></p> <p>Lists found here - <a href="https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.nesbiodiversity.org.uk%2Fwp-content%2Fuploads%2F2019%2F06%2FLocallyImportantSpeciesNESBReC.xlsx&amp;wdOrigin=BROWSELINK">https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.nesbiodiversity.org.uk%2Fwp-content%2Fuploads%2F2019%2F06%2FLocallyImportantSpeciesNESBReC.xlsx&amp;wdOrigin=BROWSELINK</a></p>	

**From:** [Paul Couper](#)  
**To:** [Planning Online](#)  
**Subject:** RE: ENQ/2024/1397 - Construction of New 400kV Overhead Line, Extending Approximately 106 km, Associated Substations and Ancillary Development including Access, Constructions Compounds, etc.  
**Date:** 03 October 2024 12:22:21  
**Attachments:** [Image001.png](#)

---

Good Afternoon,

Sorry I forgot to mention in my response below that the indoor noise criterion would also need to consider the cumulative impact from other electrical infrastructure that is either under consideration in the planning system or already has consent. This would include Battery Energy Storage, sub stations, transformers etc.

Thanks

Paul

---

**From:** Paul Couper  
**Sent:** Thursday, October 3, 2024 12:20 PM  
**To:** Planning Online <planningonline@aberdeenshire.gov.uk>  
**Subject:** ENQ/2024/1397 - Construction of New 400kV Overhead Line, Extending Approximately 106 km, Associated Substations and Ancillary Development including Access, Constructions Compounds, etc.

Good Afternoon,

I refer to the above enquiry consultation and I have reviewed the 'noise and vibration' chapter of the EIA.

As part of the methodology statement there does not appear to be any proposal to predict noise levels internally at noise sensitive receptors. This service has received complaints about existing 400kV upgrades to overhead power lines (OPL) and this is mainly attributed to indoor noise levels at night from the OPL. It was advised previously that an indoor noise criteria of NR25 daytime and NR20 night-time at noise sensitive premises would need to be applied. This would still be the position of this service. If the final noise impact assessment excludes this, this will likely mean this service will have to object to the proposal on the grounds of insufficient information.

The other parts of the 'noise and vibration' chapter of the EIA are satisfactory.

Thanks

Paul

Paul Couper  
Environmental Health Officer  
Team 1

**Aberdeenshire Council**  
**Buchan House**  
**St Peter Street**  
**Peterhead**  
**AB42 1QF**



DEHE  
Chartered Environmental Health Officer  
2024

**From:** [Paul Couper](#)  
**To:** [Planning Online](#)  
**Subject:** ENQ/2024/1397 - Construction of New 400kV Overhead Line, Extending Approximately 106 km, Associated Substations and Ancillary Development including Access, Constructions Compounds, etc.  
**Date:** 03 October 2024 12:20:13  
**Attachments:** [Image001.png](#)

---

Good Afternoon,

I refer to the above enquiry consultation and I have reviewed the 'noise and vibration' chapter of the EIA.

As part of the methodology statement there does not appear to be any proposal to predict noise levels internally at noise sensitive receptors. This service has received complaints about existing 400kV upgrades to overhead power lines (OPL) and this is mainly attributed to indoor noise levels at night from the OPL. It was advised previously that an indoor noise criteria of NR25 daytime and NR20 night-time at noise sensitive premises would need to be applied. This would still be the position of this service. If the final noise impact assessment excludes this, this will likely mean this service will have to object to the proposal on the grounds of insufficient information.

The other parts of the 'noise and vibration' chapter of the EIA are satisfactory.

Thanks

Paul

Paul Couper  
Environmental Health Officer  
Team 1  
Aberdeenshire Council  
Buchan House  
St Peter Street  
Peterhead  
AB42 1QF



RBHIS  
Chartered Environmental Health Officer  
2024

**From:** [Claire Herbert](#)  
**To:** [Planning Online](#)  
**Cc:** [Stephanie McMillan](#)  
**Subject:** Consultation for EIA Scoping Ref No ENQ/2024/1397 - Archaeology response  
**Date:** 03 October 2024 14:54:54

---

ENQ/2024/1397

**The Town and Country Planning (Environmental Impact Assessment)  
(Scotland) Regulations 2017**

**Proposal: Construction of New 400kV Overhead Line, Extending  
Approximately 106 km, Associated Substations and Ancillary Development  
including Access, Constructions Compounds, etc.**

**Site: Tealing To Kintore**

**Grid Reference: 360088.775963**

Dear Stephanie,

Thank you for consulting us on the above EIA Scoping Report. Having reviewed the Environmental Impact Assessment (EIA) Scoping Report (September 2024), with particular reference to chapter 6 Cultural Heritage, I have the following comments to make with regards the historic environment:

- I agree with the approach to mitigation outlined in section 6.5
- I agree with the issues scoped out, as outlined in section 6.6.3
- I agree with the EIA Assessment Scope & Methodology outlined in section 6.7
- Please also ensure that proposed compensatory planting areas are subject to historic environment / cultural heritage assessment

These comments apply to the current enquiry only.

Should you have any comments or queries regarding the above, please do not hesitate to contact me.

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: [REDACTED]

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*

Your feedback is important to us and helps us to improve our service – we value your [comments](#).

Please note, normal working hours are: Monday - Friday, 9.00am – 5.00pm

Explore the historic environment - find and follow the Archaeology Service on social media:

Instagram: [https://www.instagram.com/abshire\\_archaeology](https://www.instagram.com/abshire_archaeology)

*Twitter:* [https://twitter.com/AbshireArch\\_CH/](https://twitter.com/AbshireArch_CH/)

*YouTube:* <https://www.youtube.com/channel/UCI3fCWk-cwaN2Nj1G0BkHPg>

## Built Heritage Consultation Response

Planning Reference No:	ENQ/2024/1397 Construction of New 400kV Overhead Line, Extending Approximately 106 km, Associated Substations and Ancillary Development including Access, Constructions Compounds. Tealing to Kintore Request for Scoping opinion to determine information to be provided within the EIA.
Environment Planner:	Clare Tierney
Date of Response:	03/10/24

<input type="checkbox"/>	Acceptable
<input type="checkbox"/>	Objection
<input type="checkbox"/>	Holding Objection
<input type="checkbox"/>	Acceptable Subject to Following Action
<input type="checkbox"/>	No Comments
<input checked="" type="checkbox"/>	Further Information Required

1.	Issue:	Further information will be required
	Actions:	
	a)	Ensure that all designated historic assets are clearly identified
	b)	Be aware that both views from and to any designated historic asset must be considered.
	c)	Given the significance of Castle Fraser and its apparent physical proximity to a possible route, clearly demonstrate how landscape prevents any impact on its setting
	d)	Ensure that all zones of theoretical visualisation are well illustrated.
	e)	The exact location of the towers is required to make a fully informed decision on the full impact of the development on designated historic asset
	Justification:	<a href="#">NPF 4 Historic Assets and Places Policy 7</a>

<a href="#">ALDP 2023 Policy HE1: Protecting Listed Buildings, Scheduled Monuments and Archaeological Sites (including other historic buildings)</a>	
<a href="#">ALDP 2023 Policy HE2: Protecting Historic, Cultural and Conservation Areas</a>	
Historic Environment Scotland Managing Change in the Historic Environment:	
<a href="#">Boundaries</a>	
<a href="#">Gardens and designed Landscapes</a>	
<a href="#">Setting</a>	
Supporting Statement:	
<p>The setting of a built heritage designation may often be important in contributing to the character and special interest of that asset and how it is experienced and appreciated by both the local and wider communities.</p> <p>As such it is essential that we take into consideration the backdrop of conservation areas, designed landscapes and listed buildings when evaluating the potential impact of any future development. The fundamental assumption is to ensure that any proposal does not undermine or compromise any important views of nationally designated historic assets or impact on their immediate surroundings.</p> <p>Given that the above would relate primarily to the tower structures, which the locations of still have to be determined, any comment given at this stage can be no more than general advice</p>	
2.	Issue:
	Actions:
	a)
	b)
Justification:	
Supporting Statement:	



Technical Consultation No 1 for Planning Application Ref: ENQ/2024/1397

Application type: The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017

Proposal: Construction Of New 400kv Overhead Line, Extending Approximately 106 Km, Associated Substations And Ancillary Development Including Access, Constructions Compounds, Etc

Location: Tealing To Kintore

Date consultation request received: 24/09/2024

Planning Officer: S M

Roads Officer: E M

**1. Visibility Requirements (See Section 4)**

Speed Limit at site: mph

Design speed: mph ( ) for ( )

Based on the minimum visibility requirements within Aberdeenshire Council's current standards and on the design speed a visibility of metres by metres will be required

Does current application provide this? Yes  No

**2. Parking Requirements:**

From Aberdeenshire Council's Parking Standards the required parking provision is Spaces made up of: Operational and Non-Operational.

Is shown provision of spaces acceptable Yes  No

**Note:**

Parking will be required within each site as appropriate during the construction period, following delivery parking provision will be required in perpetuity for operation and maintenance as appropriate to the specific piece of infrastructure.

This information should be detailed as part of any formal Planning application(s).

### 3. Road Layout:

Is a Traffic Assessment required?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Access onto Public Road Network?	Direct	<input checked="" type="checkbox"/>	Indirect	<input type="checkbox"/>
Will the Shown Layout Require RCC?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Does the Shown Layout Appear to Comply with RCC?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

### 4. Other Comments:

Access to the proposal will be via many roads within Aberdeenshire, these roads will have contrasting road makeup and road widths, as part of any subsequent applications full details should be provided of construction traffic to each site from the adjoining trunk road network. Full details should be provided of the following, vehicle types and frequency of the access and egress, junction dimensions, drainage, gradients, materials, swept path analysis, visibility splays, and proposed construction traffic routes. The internal construction traffic route should be detailed from the public road including the turning and passing provisions.

Full details of how the construction traffic interaction with the existing public roads will be managed, passing provision, visibility windows, road widening, and any associated improvements should be provided. An appraisal of the roads from the trunk road network will also be required as part of any future applications.

Applicant should engage with Roads Development via the Planning Service in advance of any future applications as appropriate, this will allow an opportunity to discuss further detail as it is established.

### 5. Recommendations:

This Service objects to this application for the following reasons:-

Transportation Planning  
(See Section 4)

Road Safety  
(See Section 4)

Insufficient Visibility

Insufficient Parking Provision

Insufficient information has been submitted to comment on this application. Please treat this response as a holding objection until the required information has been submitted. (See Section 4)

This Service has the above comments to make on this enquiry .

This Service does not object to this application subject to the following conditions and advisories being applied should planning permission be granted:-

Initialed by: REDAC

Date: 04/10/2024



From mountain to sea

## Pre-Application Advice Request: Consultee Response

To complete this response form, complete the tables below. For the response sections, insert the topic heading in the 'Topic' box and in the box below insert the relevant text. The text in these tables will be exported into the feedback report which is to be sent to the applicant within 28 days of the pre-application advice meeting.

The 'Assessments to be carried out and/or submitted with the application' section of the response should be completed by inserting an 'X' against the relevant information. If there is an assessment that you request regularly and it is not listed, please [get in touch with the admin team](#) to request that the table be updated.

Within your response, we would appreciate if text such as "I", "Our" or "We" was not used unless you are an internal consultee. Can all external consultees please use the name of your organisation i.e. instead of "we would request" could you use "SEPA would request". Internal consultees are discouraged from using "I" as we are looking to achieve 1 corporate voice within our response. Where you wish to include hyperlinks in your response, please include these as the full link and not a shortened version or hyperlinked word.

Planning Ref	ENQ/2024/1397
Date of Meeting	
Proposal Name	Construction of New 400kV Overhead Line, Extending Approximately 106 km, Associated Substations and Ancillary Development including Access, Constructions Compounds, etc.  Site: Tealing To Kintore
Your Name Position and Organisation	Andrew Gemmell – Senior Engineer
Your Ref	
Email	██
Date of Response	08/10/2024

<b>Topic Water - Flood Risk</b>
Flood Risk is not exactly definable at this stage, but drainage details and flood risk assessments may/will need to be provided to demonstrate how surface water will be managed depending on the final locations of site works.
<b>Topic</b> Choose an item.
<b>Topic</b> Choose an item.
<b>Topic</b> Choose an item.
<b>Topic</b> Choose an item.

Assessments to be carried out and/or submitted with application		
Abnormal Load Assessment		Open Space Strategy
Access Management Plan		Operational Noise Assessment
Arboricultural Impact Assessment		Peat Management
Archaeological Site Investigations		Planning Statement
Assessment of Impact of Historic Environment		Pre-Application Consultation Report
Aviation Impact Assessment		Private Water Supplies
Borrowpit Management Plan		Protected Habitat Survey
Carbon Balance Assessment		Protected Species Survey
Compensatory Planting Plan		Restoration/Decommissioning Plan
Construction Noise Assessment		Retail Impact Assessment
Construction Traffic Management Plan		Schedule of Mitigation
Contaminated Land Report		Shadow Flicker Assessment
Design and Access Statement		Street Elevations
Development Brief		Structural Survey
Drainage Impact Assessment	Y	Sustainable Design Statement
Dust Survey		Swept Path Analysis
Electric Car Charging Strategy		Transport Statement
Flood Risk Assessment	Y	Tree Constraints Plan
Forest Residual Waste Strategy		Tree Protection Plan
GWDTE Assessment		TV/Radio Impact Assessment
Habitat Management Plan		Vibration Assessment
Landscape and Visual Impact		Visualisations
Landscape Maintenance/Management Plan		Waste Strategy
Landscape Plan		Other (Please Specify)
Masterplan		

Please email your completed form to [planningonline@aberdeenshire.gov.uk](mailto:planningonline@aberdeenshire.gov.uk) or by post to:  
 ePlanning team, Aberdeenshire Council, Viewmount, Arduathie Road, Stonehaven, AB39 2DQ

---

**From:** Peter Exon on behalf of Contaminated Land  
**Sent:** 08 October 2024 11:51  
**To:** Planning Online  
**Subject:** RE: Consultation for EIA Scoping Ref No ENQ/2024/1397

**ENQ/2024/1397 Construction of New 400kV Overhead Line, Extending Approximately 106 km, Associated Substations and Ancillary Development including Access, Constructions Compounds, etc.; Tealing To Kintore**

**Environmental Protection Act 1990: Part IIA Contaminated Land**

Thank you for consulting us on this enquiry.

I have reviewed the relevant parts of the submitted Environmental Impact Assessment Scoping Opinion document. The proposals, in respect of contaminated land, are acceptable.

I have no further comment to make on this enquiry.

Regards,

Peter.

---

Peter Exon  
Assistant Scientific Officer

Aberdeenshire Council,  
Environment and Infrastructure Services,  
**Environmental Health,**  
Gordon House,  
Blackhall Road,  
Inverurie, AB51 3WA

-----Original Message-----

**From:** [planning@aberdeenshire.gov.uk](mailto:planning@aberdeenshire.gov.uk) [planning@aberdeenshire.gov.uk](mailto:planning@aberdeenshire.gov.uk)  
**Sent:** Tuesday, September 24, 2024 2:18 PM  
**To:** Contaminated Land [contaminated.land@aberdeenshire.gov.uk](mailto:contaminated.land@aberdeenshire.gov.uk)  
**Subject:** Consultation for EIA Scoping Ref No ENQ/2024/1397

Please find attached consultation request from Aberdeenshire Council, Planning and Economy Service.

The documents will be sent to you by WeTransfer.

Send your reply to [planningonline@aberdeenshire.gov.uk](mailto:planningonline@aberdeenshire.gov.uk)

Aberdeenshire Council  
Planning and Economy Service

#### 400kV Overhead Line Tealing to Kintore

##### Scoping Consultation on landscape and visual matters for Aberdeenshire Council, October 2024

Consultation comments on landscape and visual matters were provided in July 2023. The following issues were raised in these comments which have relevance to our review of the Scoping Report:

- Considerations given to alternatives to the overhead line are not balanced in that the disadvantages of undergrounding the line are set out in full but not the advantages (both environmental and technical). It was recommended that thorough consideration should be given to undergrounding sections of the line to minimise effects on the most sensitive landscape and visual interests.
- The Braes of Meams SLA is a principal constraint with potential effects on the integrity of the distinctive pattern of policy woodlands around Fettercairn, the setting of this settlement and nearby designed landscapes a key concern. Views from well-known viewpoints within the SLA and views (both from within and outside the SLA) where the appreciation of the contrast between the Highland Boundary Fault and the Howe of Meams is strongest are also sensitive to a development of this scale and nature.
- Careful routing of the line will be needed to minimise effects on the special qualities of the Dee Valley SLA including the integrity of woodland on valley sides and along the river's banks and views and landscape perception experienced from recreational routes along the Dee.
- We expressed the view that landscape mitigation and enhancement measures should form a key part of the proposals. These should include off-site woodland and hedgerow planting to assist with screening from roads and residential properties.

The Scoping Report sets out the methodology and approach that will be adopted when undertaking the Landscape and Visual Impact Assessment (LVIA) of the proposal. It is confirmed that the proposed methodology and the scope of the landscape and visual interests to be considered in the LVIA is satisfactory. We welcome the opportunity to agree final representative assessment viewpoints as noted in paragraph 5.4.3 of the Scoping Report.

It is noted in paragraph 5.5.5 that the applicant intends to consider 'Additional Mitigation' following further assessment work where this could potentially mitigate significant landscape and visual effects. We would reiterate our request that not just landscape mitigation of the effects of the proposal should be considered but also wider landscape and biodiversity enhancement measures in accordance with the requirements of NPF4. Similarly, the location, design and composition of compensatory planting should be carefully considered given the likely removal of woodland on the route of the overhead line (as shown in the Ecological Designations and Forestry figures which accompany the Scoping Report).

Your Ref: ECU00005225  
 Our Ref: 24/00571/EIASCO

9 October 2024

Shafharia Khatazaj  
 Senior Case Officer  
 Energy Consents Unit



By email only to: [EconsentsAdmin@gov.scot](mailto:EconsentsAdmin@gov.scot)  
 Copy also sent to: [REDACTED]

Chief Executive  
 Kathryn Lindsay

Dear Shah

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

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION  
 FOR KINTORE TO TEALING 400 kV OVERHEAD LINE

I write in response to your email of 18 September 2024 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](mailto: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 to construct and operate a 106 kilometre (km) 400 kV OHL, supported by steel lattice towers between a proposed new substation at Emmock (Angus) and an existing substation at Kintore via a second proposed new substation to be named Hurlie, which is to be located within Fetteresso Forest west of Stonehaven (Aberdeenshire). The Environmental Impact Assessment (EIA) Scoping Report relates to the proposed installation and operation of the OHL project. Separate applications for planning permission for the two new substations will be submitted to the relevant local planning authorities.

2. Angus Council officers have been involved in SSEN led discussions in relation to a new Kintore to Tealing 400kV OHL proposal over a period of months prior to the formal request for a Scoping Opinion to Scottish Ministers. The comments in this response relate to the aspects of the proposal in the Angus Council area only.
3. 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 ES1), 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 3.2. It is noted that the EIA Report (Chapter 2) will include a detailed explanation of the need for the project, and (Chapter 4) the routing process and alternatives. The Scoping Report indicates that a summary of the alternatives considered will be set out within the EIA Report, including alternative technologies considered during the corridor, route and alignment selection process. It is important that the EIA Report sets out a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects, as noted in Annex B of Planning Circular 1/2017.
5. Chapter 7 will deal with land use and recreation. Angus Council's Countryside Access Officer has provided comment in relation to access matters and those comments are reproduced at Appendix 2. They request that consideration be given to additional recreational receptors, note that recreational impacts would be considered through the landscape and visual impact assessment, and mitigated through an Access Management Plan. They generally agree the proposed approach to scoping, and welcome further discussion in relation to the identified matters.
6. Chapter 9 will deal with landscape and visual amenity. Comments provided by the council's landscape advisor (LVI advisor) are included at Appendix 2. It is noted that the Scoping Report indicates (at 5.6.7) that because the local landscape areas in Angus have yet to be formally adopted, they have not been considered further. For clarification, the Local Landscape Areas in Angus were approved by Angus Council on 16 April 2024 and are no longer subject to change. Accordingly, impacts on the LLAs should be scoped into the landscape and visual impact assessment of the proposal.
7. The Scoping Report indicates (at 5.6.12) that the need for residential visual amenity assessment (RVAA) will be considered on a case-by-case basis, but generally will be limited to properties within 170m of the OHL (approximately 3x the height of the proposed support structures). The LVI advisor has commented that the proposed 170m general threshold for the RVAA may not capture all significant impacts on housing, and that matter would benefit from further consideration/discussion to ensure an approach is agreed between the applicant and the relevant local authorities.
8. It is noted that section 5.7.6 indicates that additional viewpoints over and above those identified in the list of preliminary viewpoints will be discussed and agreed with the relevant consultation bodies, including Angus Council. Angus Council provided feedback to Land Use Consultants on 2 May 2024 (reproduced in Appendix 2) in relation to that matter and is willing to engage further in relation to viewpoint selection, including cumulative viewpoint selection. It is noted that a list of consented and proposed developments to be considered in the cumulative LVIA will be agreed with the ECU, and a preliminary list is included at 5.7.18. An updated list of cumulative developments (battery storage, solar and wind development) in proximity to the proposed OHL route and around the proposed new substation at Emmock can be provided by Angus Council on request.
9. Chapter 10 will deal with cultural heritage. It is noted that feedback on the Scoping Report will be provided by HES. Comment from Angus Council's archaeological advisor is provided at Appendix 2. The archaeology service agrees with the proposed scope and methodology at Section 6.7, the matters to be scoped out of the

assessment at 6.6.3, and the approach to mitigation at 6.5. It requests that compensatory planting areas are subject to historic environment / cultural heritage assessment.

10. Chapters 11 and 12 will deal with ecology and ornithology. It is noted that NatureScot is generally satisfied with the topics to be scoped in and out of the EIA Report insofar as it relates to their remit. The council's environment team notes the inclusion of the Angus Local Nature Conservation Sites into the assessment and is satisfied with the scope of the assessment. Comment is provided by the council's countryside officer in relation to woodland of nature conservation value, and those comments are reproduced at Appendix 2.
11. Chapter 13 will deal with geology and soils (amongst other things). The council's environmental protection officer notes the approach to considering land contamination and provides additional comment in relation to that matter, having regard to the location of farmsteads, airfields or military sites and former railway lines (see appendix 2 for details).
12. Chapter 14 will deal with traffic and transport. Angus Council's roads service considers the assessment scope and methodology to be acceptable. It notes that it is proposed that consultation responses, together with feedback awaited from the relevant local authority roads departments will be addressed in the Traffic and Transport EIAR chapter and will inform the proposed mitigation measures which may be required to address potentially significant adverse impacts as a result of construction traffic. Discussions will be undertaken with the appropriate roads authorities with regards to any proposed changes to the local or trunk road network which will be addressed in EIA Report. The traffic and transport assessment to be presented in the EIA Report will also take account of any further relevant guidance and standards advised by the local roads and planning authorities.
13. Chapter 15 will deal with noise and vibration. The council's environmental health service has indicated that in terms of both construction and operational noise, it is generally satisfied with the approach proposed. It suggests that it is not however clear that an assessment of internal noise levels within sensitive receptors during the operational phase will be undertaken, and requests that this requirement is identified in the scoping response.

#### Appendix 2 – Consultation responses on scoping

Consultee	Response provided	Date of response
Environmental health (amenity)	yes	18 September 2024
Environmental health (contaminated land)	yes	19 September 2024
Roads (traffic)	yes	7 October 2024
Roads (flooding/drainage)	no	
Landscape Advisor	yes	3 October 2024
Archaeology	yes	24 September 2024
Environment team	yes	2 October 2024
Access officer	yes	24 September 2024

Planning service	Comment provided in relation to viewpoints	2 May 2024
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# Ed Taylor

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From: Iain H Graham  
Sent: 18 September 2024 15:35  
To: Ed Taylor  
Cc: Martin Petrie  
Subject: FW: 24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore To Tealing 400kV Overhead Line

Hi Ed

Thank you for affording Environmental Health the opportunity to comment on the EIA Scoping Report.

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. In terms of both construction and operational noise I am generally satisfied with the approach proposed. It is not however clear that an assessment of internal noise levels within sensitive receptors during the operational phase will be undertaken, this being something that has previously been requested by this Service within correspondence regarding this project. I would therefore ask that this requirement be highlighted in the Council's scoping opinion response.

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

Regards

Iain

Iain Graham|Environmental Health Officer|Angus Council - [REDACTED]  
[REDACTED] [REDACTED]

---

From: Martin Petrie <[REDACTED]>  
Sent: Wednesday, September 18, 2024 2:11 PM  
To: Iain H Graham <[REDACTED]>  
Subject: FW: 24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore To Tealing 400kV Overhead Line

Hi Iain

Can you get back to Ed with this one, think it's the one you've been dealing with?

Cheers

Martin

---

From: Ed Taylor <[REDACTED]>  
Sent: Wednesday, September 18, 2024 1:57 PM  
To: Martin Petrie <[REDACTED]>; Alan J Milne <[REDACTED]>; Andy Barnes <[REDACTED]>; Andrew Brown <[REDACTED]>; Stewart Roberts <[REDACTED]>; Paul R Clark <[REDACTED]>; Kelly Ann Dempsey <[REDACTED]>; [REDACTED]

Subject: 24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore To Tealing 400kV Overhead Line

Dear All

24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore to Tealing 400kV Overhead Line

Angus Council has been consulted by Energy Consents Unit in relation to a request for a Scoping Opinion. The Scoping Opinion will identify the information which requires to be included within an EIA Report in support of an application for the installation of approximately 106 Kilometre (km) of double circuit 400kV overhead line, supported by steel lattice towers between Kintore in Aberdeenshire and Tealing in Angus, Scotland.

I have attached (1) a location plan of the proposed route of the OHL, and (2) the accompanying Scoping Report which sets out what the applicant proposes to include in their environmental impact assessment. The appendices linked to that report can be accessed using the details provided in the attached email.

To allow Scottish Ministers to provide a comprehensive scoping opinion, they have requested that AC review the scoping report and advise on the scope of the environmental impact assessment for this proposal. They also request that we set out any further matters we would like Ministers to highlight for consideration and inclusion in the assessment, particularly site-specific information.

In order to compile a timely response, I would appreciate comments on the proposed methodology by Monday 30 September 2024.

If you require more time, please get in touch as I may need to request additional time from Energy Consents Unit to provide a response on behalf of Angus Council.

If there are any other parties within the council who you consider would wish to have an input into this matter, please let me know.

Thank you for your assistance with this matter.

Regards, Ed Taylor

Distribution:-

- Martin Petrie, Environmental Health (amenity)
- Alan Milne, Environmental Health (cont. land)
- Andy Barnes, Roads (traffic)
- Andrew Brown Roads (flooding/drainage)
- Stewart Roberts (LVIA)
- Paul Clark (public access)
- Kelly Ann Dempsey (biodiversity)
- Claire Herbert (archaeology)

# Ed Taylor

---

From: Alan J Milne  
Sent: 19 September 2024 16:40  
To: Ed Taylor  
Cc: Martin Petrie  
Subject: RE: 24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore To Tealing 400kV Overhead Line

Follow Up Flag: Follow up  
Flag Status: Flagged  
Hi Ed,

I have reviewed the submitted report and location plan. I can offer the following comments.

- I have reviewed the proposed route including the buffer area. There are no areas of land coincident with the buffer area that give rise to any significant concern regarding a risk of harm from land contamination. However, along the route there are multiple farm buildings that lie within or close to the buffer and this type of land use can present the possibility of land contamination from storage of fuels and chemicals. It is appreciated that the placement of tower locations is unlikely to coincide directly with these properties but there can be adjacent filled ground or land used for sheep dipping that may present a risk when soils are disturbed.
- The scoping report states that information has been received from SEPA and Aberdeenshire Council about the risks arising from the possibility of contamination at historic airfields, but that only the Fordoun Airfield is near to the buffer area and the route alignment will take account of this. Having reviewed the route within Angus at the southern end it shows the termination point as 'Emmock', but the plan is at a large scale and the route appears to terminate to the west of this near Balkemback Farm. My point here is only to highlight that there is also a historic airfield at Tealing, just north of Emmock Farm immediately adjacent to the existing electricity distribution Station and the same restrictions will apply here regarding the route as the comments above for Fordoun. Special attention should be paid to UXO and Radioactive if disturbance of the airfield is required.
- At several points along the route there are closed historic railway lines, perhaps embankments or cuttings that are now disused. In some cases the line may have been returned to a use such as agriculture rendering it now less obvious, cuttings may have been backfilled or embankments removed. Should these areas be disturbed by any tower locations or access roads, it may be prudent to account for this within any risk assessment.

Regards

Alan

Alan Milne, Environmental Protection Officer (EP Unit), Angus Council, Place-RPS-Environmental Health, Angus House, Orchardbank Business Park, Orchard Loan, FORFAR DD8 1AN Telephone: [REDACTED]

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# Ed Taylor

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**From:** Andy Barnes  
**Sent:** 07 October 2024 16:37  
**To:** Ed Taylor; Adrian G Gwynne; Andrew Brown; Stewart Roberts; Kelly Ann Dempsey  
**Subject:** RE: 24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore To Tealing 400kV Overhead Line  
**Attachments:** Kintore to Tealing 400 kV OHL EIA Scoping Report\_Final For Issue 20240905.pdf; Fig\_1\_1\_12257\_r8\_LocationPlan\_A3L.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged  
 Hi Ed

The Applicant is proposing to submit a planning application to construct a new 106 kilometre double circuit, 400 kV Overhead Line between Kintore, Aberdeenshire and a new substation at Emmock, Tealing. A separate planning application relates to the new substation at Tealing.

Certain ancillary works would be associated with the Proposed Development such as: the formation of bellmouths where existing and proposed new access tracks connect with public roads; and construction of temporary and permanent access tracks from the public road network to OHL tower sites.

The scoping report sets out the proposed topics to be scoped in or out of the EIA. Chapter 10 deals with the topic of Traffic and Transport. The effects associated with construction traffic across the proposed study area are scoped into the assessment with the effects of traffic during operation and maintenance being scoped out of the assessment.

Chapter 10 sets out the proposed approach to the assessment of the potential effects on traffic and transport in relation to the construction phase of the proposed Development. Traffic associated with the operation of the proposed development is considered likely to be negligible and is therefore not proposed to be included within the EIA process.

It is anticipated that construction of the Proposed Development would take place over a four year period with construction commencing in 2026.

It is proposed that consultation responses, together with feedback awaited from the relevant local authority roads departments will be addressed in the Traffic and Transport EIAR chapter and will inform the proposed mitigation measures

which may be required to address potentially significant adverse impacts as a result of construction traffic.

Discussions will be undertaken with the appropriate roads authorities with regards to any proposed changes to the local or trunk road network

which will be addressed in the EIAR Traffic and Transport chapter. The traffic and transport assessment to be presented in the EIAR will also take account of any further relevant guidance and standards advised by the local roads and planning authorities. This is acceptable.

Roads located within, or in proximity to, the Proposed Route are shown in Figure 10.1 Transport Network and have the potential to be impacted by construction related traffic. These routes are to be included in the study area as well as roads outwith the Proposed Route which are anticipated to be used by construction delivery vehicles.

Mitigation measures will be applied as considered relevant including:

- The design of suitable access arrangements with full consideration given to the road safety of all road users;
- Production and implementation of a Construction Traffic Management Plan (CTMP);

- A Wear and Tear Agreement;  An Access Management Plan; and  A Staff Sustainable Access Plan.

A full review of the potential effects will be undertaken once the Proposed Alignment has been confirmed and once the full access strategy for construction activities has been confirmed.

Any residual effects predicted following the implementation mitigation measures are anticipated to be localised and most likely to occur on smaller 'B' & 'C' class or unclassified roads within the study area. Potential further additional mitigation measures to avoid or reduce any such predicted effects may include:

- Enhanced pedestrian crossing facilities;
- The avoidance of HGV traffic moving past key sensitive receptors such as primary schools at certain times of the day; and
- Localised road improvements schemes such as improvements in forward visibility and possible layby provision.

All relevant mitigation measures are proposed to be discussed and agreed with the relevant local authority where appropriate, noting that the potential effects would be temporary and associated with the construction phase only.

A focused

Transport Assessment (TA) will be provided to review the impact of transport related matters associated with the Proposed Development. This will be appended to the EIAR and will be summarised into a Traffic and Transport chapter within the EIAR. This is acceptable.

The rules taken from the IEMA guidance will be used as a screening process to define the scale and extent of the assessment:-

- Rule 1 – Include highway links where traffic flows will increase by more than 30% (or the number of HGVs will increase by more than 30%).
- Rule 2 – Include highway links of high sensitivity where traffic flows have increased by 10% or more.

Increases below these thresholds are generally considered to be insignificant given that daily variations in background traffic flow may fluctuate by this amount. Changes in traffic flow below this level predicted as a consequence of the proposed development will therefore be assumed to result in no significant environmental impact and as such no further consideration will be given in the EIAR to the associated environment effects. This is acceptable.

Once operational, it is envisaged that the level of traffic associated with the proposed development would be minimal. Regular maintenance visits would be made typically using Light Goods Vehicles (LGV) or 4x4 vehicles. It is considered that the effects of operational traffic would be negligible and therefore no detailed transportation assessment of the operational phase of the development is proposed. It is acceptable for the operational aspects to be scoped out.

Overall, the assessment scope and methodology is acceptable.

I trust the above helps.

Regards

Andrew Barnes | Team Leader - Traffic | Angus Council | [REDACTED] | Email: [barnesa@angus.gov.uk](mailto:barnesa@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)

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From: Ed Taylor <[REDACTED]>  
Sent: Tuesday, October 1, 2024 10:13 AM  
To: Andy Barnes <[REDACTED]>; Adrian G Gwynne <[REDACTED]>; Andrew Brown <[REDACTED]>; Stewart Roberts <[REDACTED]>; Kelly Ann Dempsey <[REDACTED]>  
Subject: 24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore To Tealing 400kV Overhead Line  
Importance: High

Dear All

24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore to Tealing 400kV Overhead Line

I refer to my email of 18 September 2024 in connection with the above.

The deadline for Angus Council response to the scoping opinion consultation is early next week, so I would appreciate any comments you may have on the scope of the environmental impact assessment being provided this week, even if your comment is to indicate that you are satisfied by the scope proposed by the applicant.

Thank you for your assistance with this matter. If you require further time, please let me know.

Regards

Ed Taylor | Team Leader - Development Standards | Angus Council [REDACTED] [REDACTED] | [www.angus.gov.uk](http://www.angus.gov.uk)

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# Ed Taylor

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From: Stewart Roberts  
Sent: 03 October 2024 15:51  
To: Ed Taylor  
Cc: Kelly Ann Dempsey  
Subject: RE: 24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore To Tealing 400kV Overhead Line

Follow Up Flag: Follow up  
Flag Status: Flagged

Ed – Apologies for the delay. You and I discussed VPs, cumulative assessment and route options on 1 May and you provided a response to Sarah Miller (of LUC). Much of that response probably remains our opinion. This included comments in relation to iterative LVIA process, particularly in relation alternative routes. Additional comments below:

## Section 5

### Local Landscape Areas

The four LLAs in Angus were designated by committee on 16 April 2024. The shapefiles have already been shared with Sarah Miller on 2 May 2024. The final report can be found at [https://www.angus.gov.uk/media/agenda\\_item\\_no\\_5\\_report\\_no\\_10924\\_local\\_landscape\\_areas\\_in\\_angus\\_app\\_2](https://www.angus.gov.uk/media/agenda_item_no_5_report_no_10924_local_landscape_areas_in_angus_app_2). The four Angus LLAs should be considered as part of the landscape assessment.

### Houses

The purpose of a Residential Impact Assessment is to identify significant effects. The Scoping report proposes to include houses within 170m. Whilst these houses should routinely be included, we consider that significant effects are likely to occur beyond that distance particularly where principal views from houses are affected. This requires an initial assessment of houses at a greater distance. This distance may be between 500m and 1km and we would suggest that this be set in consultation with planning authorities following sample testing.

### LVIA Viewpoints

Ed, you and I discussed draft VPs on 1 May and you provided feedback to Sarah Miller. I've checked and I don't think the VP have changed since our response. Our response is probably worth including to the Scoping response.

### Cumulative LVIA

It is noted that cumulative LVIA will include other vertical structures. As we have indicated previously, we would wish to see other energy infrastructure such as solar PV development, battery storage and substations included. Similarly, we would seek clarification on which VPs will be used for CLVIA assessment.

## Section 7

## Woodland of Nature Conservation Value

The statutory Angus Forestry & Woodland Strategy 2024-2034 was approved by committee on 11 June 2024. The Strategy identifies Woodland of High Nature Conservation Value and includes the council's policies in relation to forestry and woodland. The ES should include an assessment of impacts upon WHNCV and any impacts upon their expansion as detailed in the Strategy linked below:

[https://www.angus.gov.uk/media/agenda\\_item\\_no\\_6\\_report\\_no\\_18324\\_angus\\_forestry\\_woodland\\_strategy\\_2024\\_2034\\_final\\_report\\_appendix\\_4](https://www.angus.gov.uk/media/agenda_item_no_6_report_no_18324_angus_forestry_woodland_strategy_2024_2034_final_report_appendix_4)

Happy to chat. Especially in relation to houses!

Stewart

Stewart Roberts|Countryside Officer|Angus Council|Communities| Angus House|Orchardbank Business Park|Forfar|DD8 1AN|Tel: [REDACTED]

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## Ed Taylor

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From: Claire Herbert <[REDACTED]>k>  
Sent: 24 September 2024 17:06  
To: Ed Taylor; PLNProcessing  
Subject: RE: 24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore To Tealing 400kV Overhead Line  
24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore to Tealing 400kV Overhead Line

Dear Ed,

Thank you for consulting us on the above EIA Scoping Report. Having reviewed the Environmental Impact Assessment (EIA) Scoping Report (September 2024), with particular reference to chapter 6 Cultural Heritage, I have the following comments to make with regards the historic environment:

- I agree with the approach to mitigation outlined in section 6.5
- I agree with the issues scoped out, as outlined in section 6.6.3
- I agree with the EIA Assessment Scope & Methodology outlined in section 6.7
- Please also ensure that proposed compensatory planting areas are subject to historic environment / cultural heritage assessment

These comments apply to the current enquiry only.

Should you have any comments or queries regarding the above, please do not hesitate to contact me.

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: [REDACTED]

Search the Historic Environment Record: <https://online.aberdeenshire.gov.uk/smrpub>

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

Your feedback is important to us and helps us to improve our service – we value your [comments](#).

Please note, normal working hours are: Monday - Friday, 9.00am – 5.00pm

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Twitter: [https://twitter.com/AbshireArch\\_CH/](https://twitter.com/AbshireArch_CH/)

YouTube: <https://www.youtube.com/channel/UCI3fCWk-cwaN2Nj1G0BkHPg>

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## Ed Taylor

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From: Kelly Ann Dempsey  
Sent: 02 October 2024 17:16  
To: Ed Taylor  
Subject: RE: 24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore To Tealing 400kV Overhead Line

Good evening

Thank you for the opportunity to comment. I am satisfied by the scope proposed by the applicant and welcome that the recently designated Angus Local Nature Conservation Sites are included.

Regards

Kelly Ann

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From: Ed Taylor <[REDACTED]>  
Sent: Tuesday, October 1, 2024 10:13 AM  
To: Andy Barnes <[REDACTED]>; Adrian G Gwynne <[REDACTED]>; Andrew Brown <[REDACTED]>; Stewart Roberts <[REDACTED]>; Kelly Ann Dempsey <[REDACTED]>  
Subject: 24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore To Tealing 400kV Overhead Line  
Importance: High

Dear All

24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore to Tealing 400kV Overhead Line

I refer to my email of 18 September 2024 in connection with the above.

The deadline for Angus Council response to the scoping opinion consultation is early next week, so I would appreciate any comments you may have on the scope of the environmental impact assessment being provided this week, even if your comment is to indicate that you are satisfied by the scope proposed by the applicant.

Thank you for your assistance with this matter. If you require further time, please let me know.

Regards

Ed Taylor | Team Leader - Development Standards | Angus Council <[REDACTED]> | [www.angus.gov.uk](http://www.angus.gov.uk)

# Ed Taylor

---

From: Paul R Clark  
Sent: 24 September 2024 18:57  
To: Ed Taylor  
Subject: RE: 24/00571/EIASCO – Consultation on content of EIA Report (Scoping) relating to proposed new Kintore To Tealing 400kV Overhead Line

Hi Ed

I have reviewed the recreation content within chapter 4.

The document identifies public rights of way and heritage paths as recreational receptors, as well as core paths and the national cycle network. It also lists various other tourism facilities and recreational fishing locations. However only the core paths and national cycle network routes are shown on the Forestry and Recreation Constraints maps (which I obtained from the Energy Consents Unit website). It would be helpful if all listed recreational receptors (including public rights of way and heritage paths) were identified on the maps.

Consideration should also be given to the following potential recreational receptors:

- Other paths and tracks – access rights apply to most paths and tracks, including those that are not core paths or public rights of way etc. Many will be locally important for access and should be considered and protected.
- Canoeing/kayaking – the North Esk and South Esk are both regularly used for paddlesports. The West Water and Dean Water may also be used occasionally.

The document proposes to mitigate Recreational impacts through provision of an Access Management Plan, and through consideration of recreational amenity in the Landscape and Visual Assessment. If both of those take place, I have no issue with recreation being scoped out of further consideration in the EIA as proposed.

The Access Management Plan should consider the additional recreational receptors I have listed above. And it should include maps of all relevant recreational routes (including ‘other paths and tracks’). Angus Council should be consulted on its content.

Best regards

Paul Clark | Countryside Access Officer | Angus Council |  |  
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## Ed Taylor

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From: Ed Taylor  
 Sent: 02 May 2024 13:11  
 To: Sarah Miller  
 Cc: Paul Macrae; Erin Hynes; Fiona Pennycook; Henry Collin; Gail Currie; Daniela Foote; Taylor, Jackie; Gunstensen, Louise  
 Subject: RE: LT455 Kintore to Tealing 400kv OHL Viewpoint Consultation LVIA  
 Hi Sarah

Thanks for your email and I apologise for the delay in responding. Having considered the content of the information submitted with our LVIA advisor, our comments are as follows:-

### LVIA Study Area

- The proposed 3km wide offset either side of the OHL seems relatively modest for structures of this height (average 57m up to a maximum of 70m) and we are concerned that significant effects may occur beyond 3km. It is noted that more distant viewpoints up to 5km will be included where the assessor considers visual effects to arise beyond the 3km area. Our view is that the study area more generally should be increased to 5km either side of the proposed OHL, as significant effects are likely to extend beyond 3km.
- It is also noted that the study area is centred on the baseline route (PDBA) and in some places the alternative route (PDVA) deviates significantly (around or in excess of 1km) from the baseline route, and a wider study area would take account of implications from the different options.
- Exploring route options through an iterative LVIA process is welcomed and therefore the study area and VP selection should adequately take account of the different potential effects of each option.

### Representative viewpoints

It is noted that the proposed VPs have been selected to represent a range of receptors including recreational receptors, residential receptors, road users, cultural heritage receptors which is welcomed. We have suggested some amendments and a number of additional VPs to facilitate a detailed assessment of effects.

The numbering in the proposed VP list doesn't match the location of VPs, e.g. VP5 is Padanaram, but is listed as Tannadice. It is VP24 in the table submitted. For the avoidance of doubt, our comments are based on the VP numbering on the maps and not the table.

- For the scale of development proposed, it is considered that there are relatively few viewpoints and consideration should be given to increasing the number in order to provide a better representation of the nature and significance of effects.
- VPs 1 & 2 – we would request additional VPs in areas close to the proposed Emmock substation, in the area around the public road between Kirkton of Auchterhouse and Kirkton of Tealing NW of the proposed substation; and something which is more representative of residential receptors within the small settlements around Tealing.
- VP3 – VPs to the northwest and southeast of this VP would be helpful.
- VP4 – VPs to the northwest and southeast of this VP would be helpful.
- Has consideration been given to a VP which considers impacts on the HGDL at Glamis Castle?
- VP5 - VPs to the northwest and east of this VP would be helpful. A VP from the brae to the northwest of Padanaram School between the red and the black routes would be helpful to enable an assessment of the alternative route option here.

- An additional VP from Balmashanner Hill on the southern edge of Forfar is requested.
- VP6 – Kirriemuir is helpful, and if there is scope for an additional VP from the cemetery at Kirri Hill, it would be helpful.
- VP7 Tannadice – location agreed. If a wireline to illustrate impacts on the Tannadice Conservation Area could be provided, that would be helpful.
- An additional VP at Angus Hill layby off the B9134 would be helpful (Grid ref: NO5336356796).
- In the area between VP7 (Tannadice) and VP8 (Lille Brechin), it would be helpful to add an additional VP which allows the route options here to be assessed. Somewhere along the C30 near Bogton of Balhall may be helpful.
- VP9 White Caerthun is welcomed.
- The precise location of the proposed VP10 is important due to established tree planting at Edzell.
- An additional VP on the C30 at Hill of Stracathro would be helpful.
- An additional VP from the A90 (T) would be helpful.
- An additional VP at Inchbare would be helpful.

We would also wish to agree VPs to be used for cumulative LVIA. Some of the VPs already proposed may be suitable for this, but to agree appropriate VPs we would wish to see mapping of renewable energy development and existing electrical transmission infrastructure.

I'll also come back to you on your request for LLA shapefiles ASAP.

I hope the above proves helpful.

Regards, Ed Taylor

Ed Taylor | Team Leader - Development Standards | Angus Council | [REDACTED] | [www.angus.gov.uk](http://www.angus.gov.uk)

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From: Sarah Miller <[REDACTED]>  
 Sent: Wednesday, April 3, 2024 5:21 PM  
 To: Ed Taylor <[REDACTED]>  
 Cc: Paul Macrae <[REDACTED]>; Erin Hynes <[REDACTED]>; Fiona Pennycook <[REDACTED]>; Henry Collin <[REDACTED]>; Gail Currie <[REDACTED]>; Daniela Foote <[REDACTED]>; Taylor, Jackie <[REDACTED]>; Gunstensen, Louise <[REDACTED]>  
 Subject: LT455 Kintore to Tealing 400kv OHL Viewpoint Consultation LVIA

Dear Ed,

Kintore to Tealing 400 kV Overhead Line (OHL)

I am one of the EIA Project Managers from Land Use Consultants (LUC) who is working on behalf of Scottish and Southern Energy Networks (SSEN) Transmission for the Kintore to Tealing 400 kV OHL project located within the Aberdeenshire and Angus Council areas.

I am writing to seek feedback from you on the proposed study areas and representative viewpoints for Landscape and Visual Impact Assessment (LVIA) that we are looking to include within the Environmental Impact Assessment (EIA). I have attached a letter on behalf of our LVIA team which includes further detailed information.

I will be following up next week with a similar correspondence in relation to the Emmock and Hurlie 400kV substation projects.

I look forward to hearing back from you in due course but please do not hesitate to contact me should you wish to discuss the project and EIA further.

Kind regards,

Sarah Miller



Sarah Miller  
Senior Environmental Planner  
BSc (Hons) MSc ACIEEM AIEMA

I work Mon to Fri 9:00 - 17:30



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By email: [EconsentsAdmin@gov.scot](mailto:EconsentsAdmin@gov.scot)

Ms Shafharia Khataza  
Senior Case Officer  
Energy Consents Unit  
The Scottish Government

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

Enquiry Line: 0131-668-8716  
[HMConsultations@hes.scot](mailto:HMConsultations@hes.scot)

Our case ID: 300062363

23 October 2024

Dear Shafharia Khataza

**The Electricity Works (Environmental Impact Assessment) (Scotland)  
Regulations 2017  
Kintore to Tealing 400kV Overhead Line  
Scoping Opinion**

Thank you for consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 18 September 2024. 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 a new 400kV overhead line (OHL) running between a new substation at Emmock, near Tealing in Angus via a new substation at Hurlie near Fiddes, to the existing substation at Kintore, Aberdeenshire. The proposals are for approximately 106km of new 400kV double circuit OHL carried on steel lattice towers of average height of 57m and average spans of 350m between towers.

### 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](mailto:hmconsultations@hes.scot). If you have questions about this response, please contact Victoria Clements at [Victoria.Clements@hes.scot](mailto:Victoria.Clements@hes.scot).

Yours sincerely

**Historic Environment Scotland**

## ANNEX

### Historic Environment Scotland's interest

We have previously provided advice on potential impacts on historic environment assets within our remit during pre-application consultations with the applicant in July 2023, February, March and April 2024. We welcome that impacts on the historic environment have been scoped in to the EIA.

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

#### **Scheduled monuments located within the proposed route**

##### **Section A**

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

The monument comprises a Late Neolithic or Bronze Age stone circle measuring 14m in diameter. It is composed of four boulders, two of which are upright and the other two are recumbent and the monument includes cup marks. We welcome that the monument is included in Table 6.4 as a cultural heritage viewpoint and note that a photomontage would be taken from the centre of the asset. Although this would help to assess the potential impact on views looking from the monument towards the OHL, we would recommend that the assessment also considers the potential impact on views looking towards the monument with the OHL appearing in the same view, and whether an additional visualisation (e.g. a wireframe) may need to be produced to demonstrate this.

##### Arniefoul, cairn 820m NE of (SM389)

The monument comprises a large prehistoric burial cairn which visible as a grass and heather-covered mound. It is located in heather moorland on the western shoulder of Haystone Hill at about 235m AOD. We welcome that the monument is included in Table 6.4 as a cultural heritage viewpoint and note that a photomontage would be taken from the centre of the burial cairn looking towards Carlunie Hill cairn (SM6449). Consideration should also be given to the potential impact on views looking towards the monument with the OHL appearing in the same view in the assessment and whether an additional visualisation (e.g. a wireframe) may need to be produced to demonstrate this.

Carlunie Hill, cairn (SM6449)

The monument comprises a prehistoric burial cairn which is grassed-over mound of about 14m diameter by some 2m high. The cairn lies on the summit of Carlunie Hill at 340m AOD commands extensive views across Strathmore. We welcome that the monument is included in Table 6.4 as a cultural heritage viewpoint and note that a wireframe would be taken from the centre of burial cairn looking towards Arniefoul cairn (SM389).

Nether Arniefoul, unenclosed settlement 500m NE of (SM6423) and Kirkton, homestead moat 350m W of (SM6070)

We welcome that the monuments are included in the assessment and are content that viewpoints do not need to be produced. We note that Kirkton homestead moat (SM6070) is located within the proposed route, however, it does not appear to have been included in the list of sites in the Scoping Report. We would therefore recommend that potential impacts on the monument are assessed.

**Section B**Battledykes, Roman camp (SM2308) and Battledykes, cairn 475m SSE of (SM7234)

We welcome that the monuments are included in the assessment and are content that a photomontage would be taken from centre of burial cairn looking across Battledykes Roman camp (SM2308) towards the OHL.

Law of Baldoukie, barrow 140m E of Baldoukie Farm (SM6314), Baldoukie, souterrains 250m NE of (SM6315), Vayne Castle, castle 290m SSW of Vayne (SM4015), Vayne, standing stone (SM135) and Law of Windsor, cairn E of Hilton of Fern (SM3375)

We welcome that the monuments are included in the assessment. We note that Law of Windsor cairn (SM3375) is included in Table 6.4 as a cultural heritage viewpoint and that a photomontage will be taken from the centre of the cairn looking towards the OHL. We note that for Law of Law of Baldoukie barrow (SM6314) is included in Table 6.4 as a cultural heritage viewpoint and that this would be from core path north of Tannadice overlooking proposed OHL alignment towards the monument as part of the LVIA. (We note that an incorrect designation reference is provided for this asset in Table 6.4 which should be clarified.)

Ballinshoe Castle, 370m ENE of Ballinshoe (SM162)

The monument comprises a later 16<sup>th</sup> or 17<sup>th</sup>-century tower house which stands on the N side of the Vale of Strathmore at around 95m AOD. The monument is located within the proposed route and we note that is included in Table 6.4 as a cultural heritage viewpoint and that a photomontage will be taken from the south elevation of the castle looking towards the OHL.

**Section C**Mill of Balrownie, ring ditch 200m SE of (SM6472)

We welcome that the monument is included in the assessment and are content that a viewpoint does not need to be produced.

Group of monuments (cropmark sites) clustered around the West Water at Inchbare (SM6367, SM6368 and SM6373)

We welcome that the monuments will be included in the assessment and are content that viewpoints do not need to be produced.

Stracathro, Roman fort and camp (SM2829)

The monument comprises a large Roman fort, which was originally one of a series of auxiliary forts screening the Agricolaan legionary fortress at Inchtuthill. The monument is located at approximately 45m AOD and is partly within the proposed route. We welcome that the monument is included in Table 6.4 as a cultural heritage viewpoint and note that a photomontage would be taken from the centre of the monument.

## Section D

Droop Hill, cairns 1250m SW of Inches (SM4778)

The monument comprises a group of at least 30 well preserved cairns measuring between 1.5m and 6.5m across and up to 0.4m high which have been formed by the clearing of ground for agriculture in prehistory and may contain human burials. We welcome that the monument is included in the assessment and are content that a viewpoint does not need to be produced.

## Section E

Nether Auquhollie, inscribed stone 400m NW of (SM983)

The monument comprises a Late Neolithic or Bronze Age standing stone measuring 2.5m high. It includes later Pictish and ogham carvings. The monument is located within agricultural land on a hillside. Good views both from and towards the stone circle are possible. These views are key parts of its setting. Although located just within the proposed route, we note that the monument does not appear to have been identified in the Scoping Report. We therefore recommend that it is included in the assessment. Given the presence of the existing OHL in the immediate vicinity of the monument, the assessment should consider the potential cumulative impact and we suggest that a visualisation (e.g. a wireframe) is produced to demonstrate this impact.

## Section F

Tillyorn, moated homestead 130m E of (SM12161)

The monument comprises the remains of either a motte or moated homestead which can be classed as an 'earthwork castle'. It survives as an earthwork mound encircled by a broad ditch and external bank and is located in an agricultural field in a valley at around 70m AOD. We welcome that the monument is included in the assessment and note that the monument is included in Table 6.4 as a cultural heritage viewpoint and that a wireframe will be produced from centre of homestead looking towards the OHL.

New Wester Echt, stone circle 170m SW of (SM6074)

The monument comprises a large Late Neolithic or Bronze Age stone circle. Three standing stones of the nine originally reported remain and they measure between 2.3m

and 3.0m high. The monument is located just below the crest of a slope in an agricultural field and there are good, long distant views both from and towards it. These views are key parts of its setting. We welcome that the monument is included in Table 6.4 as a cultural heritage viewpoint and note that a photomontage would be taken from the centre of the monument. Although this would help to assess the potential impact on views looking from the monument towards the OHL, we would recommend that the assessment also considers the potential impact on views looking towards the monument with the OHL appearing in the same view, and whether an additional visualisation (e.g. a wireframe) may need to be produced to demonstrate this.

#### South Leylodge Steading, stone circle 110m W of ([SM12350](#))

The monument comprises a Bronze Age recumbent stone circle now represented by the recumbent granite boulder which is set between two flanking monoliths. The monument is located within a cultivated field on flat, low-lying ground and good views both from and towards the stone circle are possible. These views are key parts of its setting. We welcome that the monument is included in Table 6.4 as a cultural heritage viewpoint and note that a photomontage would be taken from the junction on the public road to the southeast of the monument. This should help to demonstrate the impact on views looking towards the monument with the OHL appearing in the same view. Given the presence of the existing OHL towers in the vicinity of the monument, any assessment will also need to consider the potential cumulative impact and therefore it may be useful to include a wireframe as part of this.

### **Scheduled monuments located outwith the proposed route**

#### **Section A**

#### St Orland's Stone, Glamis ([SM90270](#) and a Property in the Care of Scottish Ministers)

The monument comprises an 8<sup>th</sup> or 9<sup>th</sup> century Pictish cross slab measuring 2.4m high. On one face is a full length cross carved in relief together with a variety of interlaced patterns and on the reverse are several Pictish symbols and figures including a rare depiction of a manned boat. Excavations in 1855 uncovered several burials around the base of the stone. The good, open views looking from and towards the monument contribute to its setting. Although the monument is located approximately 500m west of the proposed route, we note that it does not appear to have been identified in the Scoping Report. In light of this, we would recommend that it is included in the assessment and that visualisations are produced to demonstrate impacts on its setting.

#### Glamis 1, cross slab 140m WSW of Loanhead ([SM151](#))

The monument comprises a Pictish cross slab dating probably to between about AD 700 and 1000. The stone is located on the N flank of Hunters Hill at about 120m AOD. The monument is located 850m west of the proposed route and we note that it does not appear to have been identified in the Scoping Report. The monument is presently surrounded by forestry meaning that views towards the OHL would likely be screened. However, it is possible that these views could open up in future, therefore you may wish to include the site at this stage for an initial assessment.

Craig Hill, fort and broch ([SM3038](#))

We welcome that the monument is included in Table 6.4 as a cultural heritage viewpoint and note that a photomontage would be taken from the centre of the broch which occupies the west and highest point of the scheduled area.

**Sections B and C**The Caterthuns, hillforts ([SM90069](#) and a Property in the Care of Scottish Ministers)

The Brown Caterthun is a multi-period fort, remodelled throughout the 1st millennium BC and defined by multiple lines of earth and stone ramparts and ditches. The White Caterthun is similar in form but capped by a massive stone-walled fort which encloses an area of the summit measuring some 140m by 60m. These hillforts occupy prominent locations on the summits of two adjacent hills and the panoramic outward views and the reciprocal views towards them are key factors of their setting that contribute to their cultural significance. Together with the open and rural landscape character within which the monuments are situated, these views are key in being able to understand, appreciate and experience the monuments.

We welcome that the monument is included in Table 6.4 as a cultural heritage viewpoint and note that a photomontage would be taken from The White Caterthun. While this would help to assess the potential impact on views looking from this particular hillfort towards the OHL, we would recommend that the assessment also considers other potential impacts – such as the impact on both monuments and the impact on views looking towards the monuments with the OHL potentially appearing in the same view. We therefore advise that additional visualisations (e.g. photomontages and wireframes) should be produced to demonstrate this impact in light of the sensitivity of the monuments to impacts on their setting.

Finavon, fort NE of Hill of Finavon ([SM139](#))

The monument comprises an elongated oval hillfort measuring approximately 150m by 40m internally, within a vitrified wall some 6m thick. It is located in an elevated position and good views looking from and towards the monument contribute to its setting. The monument is located approximately 4km south-east of the proposed route. We welcome that it is included in Table 6.4 as a cultural heritage viewpoint and note that a photomontage would be taken from the centre of the hillfort.

**Section C**Witch Hillock, burial mound and stone setting ([SM4823](#))

We welcome that the monument is included in Table 6.4 as a cultural heritage viewpoint and note that a wireframe would be taken from the centre of the monument. While this would help to assess the potential impact on views looking towards the OHL, we would recommend that the assessment also considers the potential impact on views looking towards the monument with the OHL potentially appearing in the same view.

Edzell Castle ([SM90136](#) and a Property in the Care of Scottish Ministers) and Edzell Old Church and Lindsay Burial Aisle, 465m SSW of Edzell Castle ([SM13613](#))

The monuments comprise an early 16<sup>th</sup> century tower house, courtyard and ranges of associated buildings with an early 17<sup>th</sup> century walled garden and a medieval 13<sup>th</sup> century church and 16<sup>th</sup> century Lindsay aisle. The monuments are located approximately 2.5km and 2km north of the proposed route and we note that these monuments have not been identified in the Scoping Report. However, given the sensitivity of these assets to potential impacts on their setting, we recommend that they are included in the assessment at this stage.

## **Section D**

### Cairn o'Mount, cairns ([SM4968](#))

The monument comprises two prehistoric burial cairns which are located near to the summit of Cairn o'Mount. The monument is a prominent local landmark and good views looking from and towards the monument contribute to its setting. The monument is located approximately 9km west of the proposed route. Although this is at some distance, we note and welcome that the monument is included in Table 6.4 as a cultural heritage viewpoint and that a photomontage would be produced from larger of the two burial cairns looking towards the proposed OHL.

## **Section E**

### Raedykes, Roman camp 600m NE of South Raedykes ([SM1016](#))

The monument comprises a large Roman camp which was built probably in the late first century AD. It is located between 155m and 192m above sea level and includes the summit of Garrison Hill. The monument is located approximately 1.5km east of the proposed route. We note that the monument is included in Table 6.4 as a cultural heritage viewpoint and that a photomontage would be produced from the highest point within the monument at Garriston Hill looking towards the proposed OHL.

### Cairn-mon-earn, cairn ([SM4892](#))

The monument comprises a substantial Bronze Age prehistoric burial cairn measuring 17m in diameter and 3m in height. It is located on a prominent position on the summit of Cairn-mon-earn and good views both from and towards the stone circle are possible. These views are key parts of its setting. The monument is located approximately 3km west of the proposed route and we note that it does not appear to have been identified in the Scoping Report. Although there is a fair distance to the proposed OHL, we recommend that potential impacts on the monument are considered in your assessment in the first instance in light of the sensitivity of the monument to impacts on its setting.

## **Section F**

### East Finnercy, cairn 330m WNW of ([SM6076](#))

The monument comprises a substantial, round prehistoric burial cairn which is located on the crest of a ridge. There are good views both from and towards the cairn and these views are key parts of its setting. The monument is located just east of the proposed route. We welcome that the monument is included in Table 6.4 as a cultural heritage

viewpoint and that a photomontage would be produced from the centre of the cairn looking towards the proposed OHL.

Normandykes, Roman camp (SM2478)

The monument comprises a Roman marching camp which is thought to be probably Antonine or Severan in date. It is located on the broad hill above the old ford across the River Dee. The monument is located approximately 650m east of the proposed route. We note that the monument is included in Table 6.4 as a cultural heritage viewpoint and that a photomontage would be produced from the highest point of the monument, east of Hilton looking towards the OHL.

Upper Corskie, stone circle and Pictish symbols 530m SE of (SM6075)

The monument comprises a Late Neolithic or Bronze Age stone circle which now consists of two large granite standing stones standing about 3.0m apart and with their long axes aligned E-W. There are two cupmarks on the western stone along with later Pictish symbols comprising a mirror and comb and a mirror case. The monument is located on a slight slope within an agricultural field and good views both from and towards the stone circle are possible. These views are key parts of its setting.

The monument is located just east of the proposed route and we note that it does not appear to have been identified in the Scoping Report. We therefore recommend that potential impacts on the monument are considered in your assessment and that visualisations are produced to help demonstrate the potential impact.

Barmekin of Echt, fort, Barmekin Hill (SM57)

The monument comprises a likely late Bronze Age and Iron Age (first millennium BC) multi-vallate hillfort which is visible as upstanding stone walls and earthworks. The hillfort is located in a prominent topographical location on the summit of Barmekin Hill and was an important centre of power which controlled movement over the surrounding landscape. As well as there being good, long-distance panoramic outward views from the hillfort, the monument is also a distinctive feature meaning that views towards it are of equal importance. The monument is located approximately 550m to the west of the proposed route and any assessment should consider the potential impact of the proposed development, OHL on these views. This should also take into account the potential cumulative impact in light of the existing OHLs in the vicinity of the monument. We welcome that the monument is included in Table 6.4 as a cultural heritage viewpoint and note that a photomontage would be taken from the centre of the hillfort. Although this would help to assess the potential impact on views looking from the monument towards the OHL, we would recommend that the assessment considers the potential impact on views looking towards the monument with the OHL appearing in the same view, and whether an additional visualisation should be produced to demonstrate this.

"Cullerlie stone circle", Standing Stones of Echt (SM90088 and a Property in the Care of Scottish Ministers)

The monument comprises a Late Neolithic or Bronze Age stone circle comprising a circle of eight rough boulders within which lie eight small kerb-cairns. The monument is situated in pasture in flat ground at around 90m AOD. Good views both from and towards the stone circle are possible. These views are key parts of its setting. The

monument is located 2km east of the proposed route and we note that it does not appear to have been identified in the Scoping Report. Although there is a fair distance to the proposed OHL, we recommend that potential impacts on the monument are considered in your assessment in the first instance in light of the sensitivity of the monument to impacts on its setting.

#### Clune Wood, stone circle 280m NNE of Monthammock ([SM974](#))

The monument comprises a Bronze Age recumbent stone circle enclosing a cairn. It is situated on the summit of the hill and is presently located within Clune Wood. The monument is located 2.2km west of the proposed route and we note that it does not appear to have been identified in the Scoping Report. Although there is a fair distance to the proposed OHL, we recommend that potential impacts on the monument are considered in your assessment in the first instance in light of the sensitivity of the monument to impacts on its setting. We recognise that the surrounding trees may currently screen views of the OHL but would note that these views could open up in future.

### Category A listed buildings and Inventory gardens and designed landscapes

#### Section A

#### Glamis Castle ([GDL00189](#))

The Glamis Castle designed landscape is less than 1km west of the proposed route A1, partly inside the study zone buffer. It is identified as a 'key asset' in the Scoping Report. Our desk-based assessment indicates that the woodlands limit inward views from the surrounding roads (although there is some visibility from the A94 to the east). However, the designation record references views of the surrounding area from the parks, particularly from the castle's formal roofwalk, which may be towards the proposed OHL route. We recommend considering potential impacts on views to and from the castle that may feature the proposed development. Visualisations may be required if the initial assessment identifies the potential for significant impacts.

#### Glamis Castle ([LB11701](#))

Glamis Castle is in the centre of the designed landscape. Its principal elevation faces south, away from the OHL route. The policy woodlands are particularly significant to its setting and appear to limit some views from the building. However, an avenue to the northeast roughly aligns with the proposed development. We recommend assessing the potential impacts in views from any principal rooms to the east of the castle and views along this avenue, including from the formal roofwalk (see our comments above). Visualisations may be required if the initial assessment identifies the potential for significant impacts.

#### Kirkton of Tealing ([LB17450](#))

This asset comprises a former church in a graveyard that appears to be situated on elevated ground. Due to its proximity to the proposed OHL route, we recommend it is included for assessment (production of a ZTV could help establish if this is necessary).

## **Section B**

### Careston Castle ([LB4656](#))

Careston Castle is less than 1km south of the proposed route. Its principal elevation faces south, and the drive is orientated north towards the proposed OHL. We recommend including it for assessment and considering potential impacts in views from principal rooms and views of the castle's principal elevation with the OHL behind. This is likely to require visualisations.

### Kintrockat House ([LB5011](#))

Kintrockat House is approximately 2km south of the proposed route. Our initial appraisal suggests that important views to and from it may be limited to its grounds. We would need further information on potential impacts on the asset and its setting so that we can provide detailed comments and recommend including it for assessment (production of a ZTV could help establish if this is necessary).

### Brechin Castle ([GDL00070](#))

This designed landscape is south of the proposed route. The designation record references views from higher ground to the west and south. Key views may not be significantly affected by the proposed route. However, we advise assessing potential impacts to confirm if this is the case.

## **Section C**

### Edzell Castle ([GDL00169](#))

The late 16th-century garden at Edzell Castle is a very historically important garden. There are important views to the land south and east, in the direction of the proposed OHL. The proposed development may be far enough away to avoid impacting the designed landscape. However, due to its significance, we recommend it is included for assessment to confirm if this is the case.

### Stracathro House ([LB17803](#))/Stables ([LB17804](#))

Stracathro House is within the 1km study zone buffer. Its principal elevation faces south (the proposed OHL is to the north). As the building is close to route C1, we advise assessing the potential for setting impacts, including in views of the building's front elevation and from principal rooms. This assessment may require visualisations. We also recommend assessing potential impacts on the associated stables.

### Balbengo Castle ([LB6754](#))

The main front of Balbengo Castle faces south, including the external angle of the 16th-century plan tower house and the later Georgian wing. As the proposed development is also to the south, we recommend assessing the potential impacts on views from principal

rooms, particularly the Great Hall in the first floor of the tower. This assessment may require visualisations if significant impacts are likely.

#### Fasque House (GDL00178) / (LB9503)

The south edge of the Fasque House designed landscape is approximately 2km north of route C1. As it is on slightly elevated ground, we suggest assessing if the proposed development would likely appear in important views of the surrounding landscape. Fasque House is roughly in the centre of the designed landscape (1.5km further north). If a ZTV indicates the proposed development may be visible from the building, we recommend assessing potential impacts in views from principal rooms.

### **Section D**

#### Phesdo House (LB9646)

Phesdo House is U-plan, with the main block facing south towards the proposed development. As the building is close to route D4, we advise assessing the potential for impacts on the setting of this asset, including in views from principal rooms. This assessment should include cumulative impacts with the existing overhead line and may require visualisations.

#### Glenbervie House (GDL00194)

We responded to a refined route option consultation in March 2024. In it, we discussed route option D4 to the west of the Glenbervie House designed landscape, which we considered unlikely to have a greater impact than the previously preferred option (the designation suggests that significant views out are in the other direction). However, as it is within the 1km study area, we agree with scoping it into further assessment.

### **Section E4/F3**

#### Crathes Castle (GDL00119)

The Crathes Castle designed landscape is to the west of the additional route options E4 and F3, on the northern bank of the River Dee. From the policies, there are long views southeast across the river to the Durris Forest, where option E4 would cross. The OHL may be visible in important views from the designed landscape. We advise assessing the potential visual impact of both routes, but especially E4, as our desk-based research suggests that the most sensitive views are to the southeast. This assessment may require visualisations if significant impacts are possible.

### **Section E4/F1.3/F3**

#### Park House (GDL00309)

The Park House designed landscape is surrounded to the north, east and west by three proposed route options. The designation record explains that the key views into the designed landscape are from the south, particularly South Deeside Road. There are east and west approaches with some important views to the southeast and northwest. Key views from Park House are to the south. The OHL may be visible in important views of the designed landscape from the south (particularly South Deeside Road) and from

within it to the northeast and west. We suggest assessing the potential impacts of all route options (visualisations may be useful).

## **Section F1.3/ F2**

### Drum Castle (GDL00141)/(LB3113)

We advised assessing Drum Castle and its designed landscape in our response to the proposed route options in April 2024. Figure 6.1 demonstrates that route option F1.3 could intersect or closely pass the southwest corner of the designed landscape. Previous consultation documents have advised that mitigation could be adopted to ensure that pylons are not in key views to and from this asset. We continue to welcome this mitigation and encourage the production of the visualisations we suggested in our earlier response (April 2024) to the viewpoint consultation.

## **Section F2**

### Echt Parish Church (LB3152)

The Scoping Report states the intention to scope out any A-listed buildings in urban locations as it defines their setting as localised and likely unaffected by the proposed development (p.81). We encourage scoping in Echt Parish Church (LB3152), as it is on the edge of the village, and views of its front elevation include an open landscape behind it where the proposed OHL would pass.

### Dunecht House (GDL00153)/(LB3133)

We provided comments on the potential impacts on Dunecht House and its designed landscape in our response to the previous consultations in February 2024. The proposed OHL would intersect the western edge, and we continue to encourage mitigation and careful tower siting to avoid physical impacts on the designed landscape. Key views from Dunecht House and from within the designed landscape are mostly to the south, and Route F2, running to the west of the Inventory site, would not be visible in these views. However, the proposed OHL would interrupt views from Barmekin Hill, an important viewpoint into the designed landscape. It is unclear from the information provided if/how visible Barmekin Hill is from the avenue in the designed landscape, which we suggest is established. Disrupting these views could have significant adverse impacts, and we recommend further assessment, visualisations, and consideration of mitigation options if significant impacts are likely.

### Castle Fraser (GDL00091)/(LB2924)

Castle Fraser is to the west of F2, which broadly follows the route of an existing OHL (in this section). Our desk-based assessment suggests that there are important views out of the landscape to the north. However, given the importance and proximity of both assets, we suggest including them in the cultural heritage assessment.

## **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.

We welcome that section 6.4.3 states that direct physical impacts on all scheduled monuments and listed buildings will be avoided. We advise also adopting this mitigation for Inventory garden and designed landscapes.

Section 6.7 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 6.7.13 confirms that a ZTV will be used to identify assets that may receive impacts to their setting.

We are broadly content with the list of issues identified in section 6.6.3 to be scoped out of detailed assessment. The only issue that we would have concerns about is the scoping out of potential impacts on the setting of listed buildings within urban settings. As noted above for Echt Parish Church (LB3152) there may be some assets where further assessment may be required.

We have reviewed the information included in the Scoping Report and are broadly content that the assessment correctly identifies the historic environment assets which may be affected by the proposed development, both within and outwith the proposed route. We have in some cases included additional sites above that are not currently highlighted in the Report as we think these should be considered in the first instance in light of their particular sensitivity to potential impacts on their setting. It may be possible to exclude these assets at a later stage once a ZTV has been produced.

We welcome the provision of visualisations that demonstrate potential impacts on the setting of historic environment assets. We note, however, that these tend to only focus on views looking from sites towards the OHL, rather than on views looking towards monuments with the OHL potentially appearing in the same view. Although we recognise that it may not be possible to produce additional visualisations for every site, we would advise that attention is given to certain sites where this is likely to be particularly relevant. We have provided more detail on this in the comments above.

While setting impacts are often visual, other environmental factors can also affect heritage assets. We encourage considering other impacts, such as the sensory effects of close proximity to high voltage power lines, where these might restrict future development - for example, repurposing disused A-listed buildings like South Balluderon Farm Steading ([LB17458](#)) in Section A1, particularly for residential use.

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 note that section 6.7.36 states that cumulative effects of the proposed development along with the new substations at Emmock and Hurlie will be assessed and we welcome this confirmation given the potential for significant cumulative effects.

We welcome that section 6.7.14 states that consultation with HES and the Councils will continue to identify and address issues as they arise and confirm approaches to mitigation. We will be happy to continue to engage with the applicants as the project progresses.

Historic Environment Scotland  
23 October 2024

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

09 October 2024

Our ref: CEA177159

Your ref: ECU00005225

Sent via email to [representations@gov.scot](mailto:representations@gov.scot)

Dear Energy Consents Unit,

**ELECTRICITY ACT 1989 – THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017 – REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37  
APPLICATION FOR KINTORE-TEALING 400KV OVERHEAD LINE**

Thank you for consulting us on the above Scoping Report which we received on 18 September 2024. In accordance with the agreement between Energy Consents Unit and NatureScot, our comments on the Scoping Report focus on statutory protected areas, landscape and visual amenity, birds in the wider countryside, peatland and carbon-rich soils and protected species (not birds).

**1. Background**

The Applicant has engaged with us throughout the planning process of this proposal. We have provided feedback to them on their Overhead Line (OHL) Route Selection consultation and will shortly be providing feedback on their OHL Potential Alignment. To date, our feedback has primarily focused on statutory protected areas where the OHL has potential to affect the protected natural features. However, we have also offered comments on their approaches to surveys and methodologies for assessing the wide range of natural environment interests along the OHL route.

**2. NatureScot comments on Scoping Report**

SSEN's ongoing approach to engagement means that we consider 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 preparation of their EIA. We refer the applicants to the standing advice and guidance documents including for European sites, birds, landscape, and the Environmental Impact Assessment more broadly. We also have guidance on 'Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds' which provides information on survey work and mitigation in relation to birds.

The Fourth National Planning Framework (NPF4) sets out a new requirement for developments to deliver positive effects for biodiversity, primarily under Policy 3. Approaches to measuring biodiversity value are currently being progressed. We recommend the requirements of NPF4 are therefore adopted as part of any future applications however we are aware that the applicant is currently considering opportunities for biodiversity enhancement. For further information please see: <https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-enhancing-biodiversity>.

### **3. NatureScot advice on key issues identified at Scoping Stage**

#### **Protected Areas**

The OHL project may have an impact upon protected areas and we are advising SSEN on the best design and mitigation measures to try to avoid significant negative effects on protected features.

It is hoped that in most cases considerate design and implementation of best practices will avoid significant negative effects. We will also engage with SSEN regarding their preparation of their Habitats Regulations Appraisal (HRA).

### **4. Concluding Comments**

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 do not hesitate to get in touch if you require any further information or advice.

Yours faithfully,

Katie Bain

Planning Adviser – Central and North

cc. Sarah Cane-Ritchie (SEEN)

Ed Taylor, Angus Council Planning

Stephanie McMilliam, Aberdeenshire Council Planning

**Rob Whytock**  
**Community Liaison Manager**  
Scottish and Southern Electricity Networks  
Transmission  
200 Dunkeld Road  
Perth  
PH1 3GH

21 November 2024

Our ref: CPA177194

Send via email to [TKUP@sse.com](mailto:TKUP@sse.com)

Dear Rob,

**ALIGNMENT CONSULTATION FOR THE PROPOSED KINTORE TO TEALING 400KV OVERHEAD LINE (OHL) CONNECTION**

Thank you for consulting us on the above alignment consultation. We welcome the opportunity to provide further feedback.

Our priority following this feedback will be to liaise closely with your team on key matters relating to the protected areas that could be impacted and where there is a risk that natural heritage issues of national interest may be negatively affected.

In Annex 1, we have provided detailed feedback on protected areas that could be affected by the alignment options. The previous feedback we offered at the route selection stage (dated 31/05/2023 and 30/04/2024) remains relevant and the advice given here is in addition to previous feedback.

We do not intend to provide landscape and visual commentary at this alignment stage however we recognise that landscape and visual amenity effects have been one of the key considerations in reaching the alignment options.

The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage.

Please do not hesitate to get in touch if you would like to discuss any aspect of our feedback.

Yours sincerely,

Katie Bain

Planning Adviser – North

cc. Louise Gunstensen, SSEN

Stephanie McMillan, Aberdeenshire Council

Ed Taylor, Angus Council

Energy Consents Unit, Scottish Government

## Annex 1 – NatureScot feedback to SSEN Transmission – Kintore-Tealing 400kV OHL – Alignment Options

Section	NatureScot Comments on Protected Areas
A	<p data-bbox="300 309 746 342"><b>Firth of Tay and Eden Estuary SPA</b></p> <p data-bbox="300 387 1382 499">The alignment options are within connectivity distance for the SPA. The potential impacts to pink-footed geese are loss of foraging habitat, collision risk and possible barrier effects from the OHL.</p> <p data-bbox="300 544 1430 734">WWT goose foraging information shows a concentration of goose foraging records along the alignment west of Forfar between the A94 and B957. Collision risk should be mitigated by the installation of suitable bird diverters along this section. We do not consider that the loss of foraging habitat will be significant given the amount of available habitat in the surrounding area.</p> <p data-bbox="300 779 970 813"><b>Outer Firth of Forth and St Andrew’s Complex SPA</b></p> <p data-bbox="300 857 1417 1126">It is unlikely that there is connectivity between the alignment options and the qualifying species of the SPA. This is because, with the possible exception of red-breasted merganser, they are marine feeding species that will not move inland across the alignment of the OHL. Red breasted mergansers may possibly move inland along rivers leading from the SPA to feed on riverine fish species (e.g. salmon) during the smolt run. We recommend using bird diverters where the OHL crosses waterways to mitigate this possible impact.</p> <p data-bbox="300 1171 818 1205"><b>Loch of Kinnordy SPA, SSSI and Ramsar</b></p> <p data-bbox="300 1249 1382 1361">The alignment options are within connectivity distance for the SPA. The potential impacts to pink-footed geese are loss of foraging habitat, collision risk and possible barrier effects from the OHL.</p> <p data-bbox="300 1406 1430 1597">WWT goose foraging information shows a concentration of goose foraging records along the alignment west of Forfar between the A94 and B957. Collision risk should be mitigated by the installation of suitable bird diverters along this section. We do not consider that the loss of foraging habitat will be significant given the amount of available habitat in the surrounding area.</p> <p data-bbox="300 1641 834 1675"><b>Loch of Lintrathen SPA, SSSI and Ramsar</b></p> <p data-bbox="300 1720 1425 1832">The alignment options are within connectivity distance for the SPA. The potential impacts to greylag geese and whooper swans are loss of foraging habitat, collision risk and possible barrier effects from the OHL.</p> <p data-bbox="300 1877 1398 1989">WWT goose foraging information shows a concentration of goose foraging records along the alignment west of Forfar between the A94 and B957. Whooper swans are likely to have a similar foraging area as used by the geese. Collision risk should be</p>

	<p>mitigated by the installation of suitable bird diverters along this section. We do not consider that the loss of foraging habitat will be significant given the amount of available habitat in the surrounding area.</p> <p><b>River Tay SAC</b></p> <p>The alignment options cross the River Tay SAC at two locations where they intersect tributaries of the River Tay. Atlantic salmon and otter will be present at both crossings and it is likely that brook lamprey will also be present. Given the scale of the work in relation to the SAC, we do not consider there will be long-term impacts to the qualifying interests, provided standard mitigation measures are followed. Standard mitigation measures should be implemented during the construction work, including compliance with both project-wide and site-specific environmental management procedures. Standard protected species guidance should be followed. Measures should be in place to ensure that the aquatic environment is protected against pollution, excessive sediment run off and accidents (e.g. included within SSEN Transmission General Environmental Management Plans (GEMPs), Species Protection Plans (SPPs), Construction Environment Management Plan (CEMP)). Our understanding is that the OHL will span the river and SAC boundary. There should therefore be no direct effects on the designated species and indirect effects should be avoided through the above general measures.</p>
B	<p><b>Loch of Kinnordy SPA, SSSI and Ramsar</b></p> <p>See comments under Section A relating to Loch of Kinnordy SPA, SSSI and Ramsar.</p> <p><b>Loch of Lintrathen SPA, SSSI and Ramsar</b></p> <p>See comments under Section A relating to Loch of Lintrathen SPA, SSSI and Ramsar.</p> <p><b>Montrose Basin SSSI, SPA and Ramsar including Dun's Dish SSSI</b></p> <p>As stated in our response to the route stage consultation, the alignment options are within connectivity distance for foraging geese (15 – 20 km) that could be associated with Montrose Basin SSSI, SPA and Ramsar. As such, the potential impacts to greylag and pink-footed geese are loss of foraging habitat, collision risk and possible barrier effects from the OHL. Geese surveys will need to be carried out to establish whether there are any feeding concentrations in the area. If there are, we request the installation of suitable bird diverters on lines in these areas.</p> <p><b>River South Esk SAC</b></p> <p>The River South Esk SAC is intersected by the alignment options at two locations. It is likely that Atlantic salmon will be present at the crossing option locations. A recent survey was conducted for a casework consultation on the section of river between Tannadice and Inshewan which found freshwater pearl mussel (FWPM), including</p>

	<p>juveniles. Our understanding is that SSEN do not intend to enter the water and, as such, no FWPM survey would be required.</p> <p>Appropriate bankside construction mitigation methods should be followed. Standard mitigation measures should be implemented during the construction work to avoid excess silt and pollutants into the river, including compliance with both project-wide and site-specific environmental management procedures. Standard protected species guidance should be followed. Measures should be in place to ensure that the aquatic environment is protected against pollution, excessive sediment run off and accidents (e.g. included within SSEN Transmission General Environmental Management Plans (GEMPs), Species Protection Plans (SPPs), Construction Environment Management Plan (CEMP)). Our understanding is that the OHL will span the river and SAC boundary. There should therefore be no direct effects on the designated species and indirect effects avoided through the above general measures.</p> <p><b>Forest Muir SSSI</b></p> <p>Whilst the alignment options are within 1km of Forest Muir SSSI, we do not consider that they will affect the site due to the distance and the use of standard good practice measures.</p>
C	<p><b>Loch of Kinnordy SPA, SSSI and Ramsar</b></p> <p>See comments under Section A relating to Loch of Kinnordy SPA, SSSI and Ramsar.</p> <p><b>Montrose Basin SSSI, SPA and Ramsar including Dun's Dish SSSI</b></p> <p>See comments under Section B relating to Montrose Basin SSSI, SPA and Ramsar including Dun's Dish SSSI.</p> <p><b>North Esk and West Water Palaeochannels SSSI</b></p> <p>Based on the mapping provided, the alignment options will not directly traverse the Geological Conservation Review (GCR)/SSSI area and there is over 500m between the southern-most corner of the designated area and the closest pylon tower (based on indicative pylon locations). Therefore, we conclude that the natural heritage features of the SSSI will not be affected by the proposal. The pylon construction works will fall downstream of the SSSI and so there will be no temporary indirect impacts on sedimentation from the development affecting the SSSI.</p> <p>It is worth noting however, that the terraces and palaeochannel features do not stop at the SSSI boundary and there is an extensive suite of palaeochannels across this palaeosandur (glacial outwash). Whilst not part of the SSSI, they form part of the same suite of landforms and add wider context to the SSSI features. Earthworks for</p>

	<p>the pylons may be quite extensive where the base is stripped, levelled and cleared for the foundations of the towers. As such, we recommend that the towers should be sited on the large flat terraces, avoiding obvious palaeochannels. The indicative tower locations appear to largely be on the terraces rather than the palaeochannels, however, we would be happy to work with SSEN to further support micro-siting the pylon bases to avoid the channels.</p> <p><b>Elsie Moss SSSI</b></p> <p>Whilst the alignment options are within 1km of Elsie Moss SSSI, we do not consider that they will affect the site due to the distance and the use of standard good practice measures.</p>
D	<p><b>Fowlsheugh SPA</b></p> <p>Whilst the alignment options are within the connectivity distance for the SPA, we consider that they are not likely to have an effect on the designated features of Fowlsheugh SPA. The Scoping Report states that <i>“Although the OHL is within connectivity of the foraging range of SPA qualifying species Herring gull, relative lack of foraging opportunities within the Proposed Development coupled with a likely low collision risk of the species’ group would mean that no LSE is predicted for the qualifying Fowlsheugh SPA species.”</i> We agree with this statement.</p> <p><b>Montrose Basin SSSI, SPA and Ramsar</b></p> <p>See comments under Section B relating to Montrose Basin SSSI, SPA and Ramsar including Dun’s Dish SSSI.</p> <p><b>Loch of Lumgair SSSI</b></p> <p>We do not consider that the alignment options will affect the site due to the distance and the use of standard good practice measures.</p>
E	<p><b>Fowlsheugh SPA</b></p> <p>See comments under Section D relating to Fowlsheugh SPA.</p> <p><b>Loch of Skene SPA, SSSI and Ramsar</b></p> <p>See comments under Section F relating to Loch of Skene SPA, SSSI and Ramsar.</p> <p><b>River Dee SAC</b></p> <p>The River Dee SAC is intersected by the alignment options in three locations. It is likely that Atlantic salmon and otter are present at all river crossing options. FWPM</p>

	<p>have been found immediately downstream of the alignment and so appropriate bankside construction mitigation methods should be followed.</p> <p>Standard mitigation measures should be implemented during the construction work to avoid excess silt and pollutants entering the water, including compliance with both project-wide and site-specific environmental management procedures. Standard protected species guidance should be followed. Measures should be in place to ensure that the aquatic environment is protected against pollution, excessive sediment run off and accidents (e.g. included within SSEN Transmission General Environmental Management Plans (GEMPs), Species Protection Plans (SPPs), Construction Environment Management Plan (CEMP)). Our understanding is that the OHL will span the river and SAC boundary. There should therefore be no direct effects on the designated species and indirect effects avoided through the above general measures.</p>
<p><b>F</b></p>	<p><b>Loch of Park SSSI</b></p> <p>The potential alignment, which sits to the west of Drumoak, crosses the eastern edge of Loch of Park SSSI (based on the indicative Limits of Deviation). It is important to note that should this potential alignment be taken forward, our advice at the application stage will be in line with National Planning Framework (NPF4) Policy 4(c) which states that <i>“Development proposals that will affect a... Site of Special Scientific Interest will only be supported where:</i></p> <ul style="list-style-type: none"> <li>• <i>The objectives of designation and the overall integrity of the areas will not be compromised; or</i></li> <li>• <i>Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.”</i></li> </ul> <p><u>Section 5.3 of our ‘Development Management and the Natural Heritage’ guidance</u> provides further information on our approach. In addressing the criteria of NPF4 Policy 4(c) we will consider:</p> <ul style="list-style-type: none"> <li>• Impacts on the natural features of a sites (direct and indirect);</li> <li>• The extent to which impacts of a development might affect the condition of the site’s natural features;</li> <li>• The permanence of the impacts;</li> <li>• Impacts in combination with other proposals or activities; and</li> <li>• Our balancing duty.</li> </ul> <p>Loch of Park SSSI is mainly a surface water fed wetland with the main water supply being from the Black Burn to the west of the site with the outflow to the south. Vegetation communities within the eastern section of Loch of Park SSSI include M9</p>

(NO7705698713) which indicates there is some ground water influence. In SEPA's Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems, M9 is listed as a wetland that is likely to be highly groundwater dependant. Our previous records note the *'occurrence of two chalybeate springs (containing metal salts particularly of iron) of great strength on the Park Estate with the stronger of the two at Loch of Park'*. There are a number of wells present in the vicinity of the potential alignment, particularly the indicative tower locations. The flow of water from these wells will vary throughout the year depending on their water supply, therefore hydrological connectivity between the wells and Loch of Park SSSI may also vary in strength throughout the year. The King's Well, which is located to the north-east of the site and close to the indicative location of one of the towers, is hydrologically connected to Loch of Park SSSI. SSEN's ecological and hydrological report (November 2024) noted that in the area immediately around King's Well *'There was no semi-natural shrub or field layer as rhododendron formed a dense thicket under the tress, suppressing all other vegetation. As such it was not possible to assign an NVC community, and there were no signs of any community that could be considered to be groundwater-dependent'*. Although any potentially important wetland community cannot now grow here due to the dense rhododendron cover, it is important to note that the King's Well is hydrologically connected to Loch of Park SSSI. The potential alignment also crosses over an unnamed burn which feeds into the eastern edge of Loch of Park SSSI. The indicative Limits of Deviation zone intersects the eastern edge of the Loch of Park SSSI. If any construction was to take place within the boundary of the SSSI we would need more information before providing comments of the level of impacts.

Although ecological and hydrological survey results suggested that no Groundwater Dependent Terrestrial Ecosystems (GWDTE) were identified adjacent to or supplying Loch of Park SSSI, the construction and maintenance of the potential alignment must not disrupt the quality or quantity of water supplying the SSSI. Survey work may be needed to support this outcome in addition to micro-siting and appropriate construction methods.

There are two potential main impacts of the overhead line and associated works:

- Disruption to the quality and quantity of the water supplying the eastern side of Loch of Park SSSI through construction and maintenance operations. This may result in a change to the vegetation communities for which the site is designated. Careful micro-siting of infrastructure will be needed.
- Disruption to groundwater dependant wetland communities which occur within Loch of Park SSSI through construction and maintenance operations. This could also result in a change to the vegetation communities for which the site is designated. Careful micro-siting of infrastructure will be needed.

SEPA's Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems must be followed to ensure that there are no impacts on groundwater dependant wetland communities within Loch of Park SSSI.

### **Loch of Skene SPA, SSSI and Ramsar**

As noted in our response to the route option stage, there is potential connectivity between the alignment options and the SPA. There are potential impacts to greylag geese as a result of loss of foraging habitat, collision risk with the overhead line and/or potential barrier effects from the overhead line. As such, we consider that line marking should be used in high-risk areas identified by survey work. Survey work should inform the next stages about detailed design and mitigation, as well as the HRA process.

### **Old Drum of Wood SSSI**

This site is designated for upland woodland oak and wood pasture and parkland. We do not consider that the alignment options will affect the site due to the distance and the use of standard good practice measures.

## **Other Interests**

### Class 1 and 2 Peatland

The Carbon and Peatland Map 2016 gives an indication as to the areas where both carbon-rich soils and peatland habitats are likely to be present. It is important to note that development may have direct or indirect impacts on carbon-rich soils which do not currently support peatland habitats but may need to be taken into consideration when assessing the broader impacts of the proposal.

As the Carbon and Peatland Map 2016 is indicative, peat depth surveys should be carried out. We would welcome a methodology consistent with other OHL EIAs including the Beauly to Peterhead 400KV OHL and, as such we would be open to further discussion on the development of project specific streamline approach due to the linear nature of the development. Data such as the JHI Soil Map (Partial Coverage) and interpreted derived data such as the Map of soil phosphorus sorption capacity could support the survey methodology.

### Schedule 1 Birds

We note that some woodland areas of woodland, including at Fetteresso and Durris (Sections E and F), have the potential to support breeding raptors. Pre-construction breeding raptor surveys should be carried out and, if any breeding raptors are found, the overhead line and associated works should be buffered and carried out outwith the breeding season.

### Landscape and Visual

All alignment options identified are likely to avoid impacts on National Scenic Areas (NSAs) and Wild Land Areas (WLAs). Some of the alignment options may affect Special Landscape Areas (SLAs). NatureScot do not intend to offer advice on the effects on SLAs as the respective local authorities are best placed to comment on these.

Shafharia Khataza  
Energy Consents Unit  
The Scottish Government

Our Ref: PCS-20003038  
Your Ref: ECU00005225

By email only to: [Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)

SEPA Email Contact:  
[planning.north@sepa.org.uk](mailto:planning.north@sepa.org.uk)

09 October 2024

Dear Shafharia Khataza

**Electricity Act 1989 - Section 37**

**ECU00005225 - REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37  
APPLICATION FOR KINTORE TO TEALING 400 kV OVERHEAD LINE  
KINTORE TO TEALING**

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 and would especially welcome further pre-application engagement once initial peat probing, peat condition assessment and habitat survey work has been completed and the layout developed further as a result.

Our position and advice, given below, is based on the determining authority ultimately determining that the proposal is classed as development that could be supported for the purposes of assessment under Policies 5 and 22, as defined in National Planning Framework 4. If this is not the case, please advise so we can re-consider our position and advice.

## **Advice for the planning authority / 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 watercourses, proximity to private water supplies overlain with proposed 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, be addressed to our satisfaction in the EIA process. This provides details on our information requirements and the form in which they must be submitted.

### **1. Site specific comments**

- 1.1 It is difficult for SEPA to provide detailed, site-specific scoping comments for a project such as this at this stage. We will require further detailed information as the project is refined on, for example, proposed pylon and other associated infrastructure to assess the potential impacts on the environments that we have an interest in. The general scoping requirements attached should be followed and refined as the project develops.
- 1.2 We note the Ecological Designated sites annotated on Figures 7.1A to 7.1F and highlight another database, the Scottish Wetland Inventory GIS layer, that should inform environmental impact assessment and possible future detailed NVC survey requirements.
- 1.3 As previously highlighted to the applicant, there are a number of former airfields within the proposed development corridor which, due to potential radioactive contamination from their historic land use, may lead to the requirement for additional contaminated land investigations if any excavations are proposed within 1km radius of these sites.
- 1.4 Due to the nature of the project, we confirm detailed peat probing will only be required within the micro-siting limits of excavations for the towers and any associated infrastructure if Phase 1 peat surveys indicate the possibility of peat in that location.

## 2. Regulatory advice for the applicant

2.1 Details of regulatory requirements and good practice advice, for example in relation to engineering works in the water environment and waste management, can be found on the [regulations section](#) of our website.

If you have queries relating to this letter, please contact us at [planning.north@sepa.org.uk](mailto:planning.north@sepa.org.uk) including our reference number in the email subject.

Yours sincerely,

Zoe Griffin  
Senior Planning Officer  
Planning Service

Ecopy to:

Applicant, [REDACTED] Case officer, [REDACTED]

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/](http://www.sepa.org.uk/environment/land/planning/)

## Appendix 1: Detailed scoping requirements

Please note that some of the planning guidance referenced in this response is being reviewed and updated to reflect the [National Planning Framework 4](#) (NPF4) policies. For example the [Flood Risk Standing Advice](#) and [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#). It still provides useful and relevant information, but some parts may be updated further in the future.

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 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, buildings, site compounds, laydown areas, storage areas and any other 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.
- 1.3 A comparison of the environmental effects of alternative locations of infrastructure elements may be required.

### 2. Water environment

- 2.1 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.

2.2 The submission must include a set of drawings showing:

- a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses;
- b) A minimum buffer of 10m around each loch or watercourse. The applicant should refer to SEPAs Recommended Riparian Buffer data for the relevant minimum buffer for an individual watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works;

2.3 Further advice and our best practice guidance are available within the water [engineering](#) section of our website. Guidance on the design of water crossings can be found in our [Construction of River Crossings Good Practice Guide](#).

### **3. Flood risk**

3.1 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](#).

3.2 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.

3.3 If it is considered the development could result in an increased risk of flooding to a nearby receptor, then a flood risk assessment (FRA) must be submitted. Our [Technical Flood Risk Guidance for Stakeholders](#) outlines the information we require to be submitted in an FRA.

### **4. Peat and peatland**

4.1 Where proposals are on peatland or carbon rich soils (CRS), the following should be submitted to address SEPA's requirements in relation to NPF4 Policy 5 to protect CRS and the ecosystem services they provide (including water and carbon storage). 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.

- 4.2 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.
- 4.3 The submission should include a series of layout drawings at a usable scale showing all permanent and temporary infrastructure, with 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.
- 4.4 The detailed series of layout drawings above should clearly demonstrate that development proposals avoid any near natural peatland and that all proposed excavation is on peat less than 1m deep.
- 4.5 The layout drawings should also demonstrate that peat excavation has been avoided on sites where this is possible. On other sites where complete avoidance of peat and carbon rich soils is not possible then it should be clearly demonstrated that the deepest areas of peat have been avoided and 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.

4.6 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 (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 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) Use of excavated peat in areas not disturbed by the development itself is now not a matter SEPA provides 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 SEPA 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 may be found in the document [Is it waste - Understanding the definition of waste](#).

## 5. GWDTE and existing groundwater abstractions

- 5.1 Groundwater Dependent Terrestrial Ecosystems (GWDTE) are protected under the Water Framework Directive. Excavations and other construction works can disrupt groundwater flow and impact on GWDTE and existing groundwater abstractions. The layout and design of the development must avoid impacts on such areas.
- 5.2 The following information should be submitted:
- a) A set of drawings demonstrating all GWDTE and existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. The survey needs to extend beyond the site boundary where the distances require it.
  - b) If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice and the minimum information we require to be submitted.
  - c) An NVC for all areas within the relevant GWDTE buffers and any proposed micro-siting limits.
- 5.3 Please note that due to discrepancies in habitat definition and ambiguity in correspondence with NVC types we do not accept the use of The UK Habitat Classification System (UKHab) as an alternative to NVC.

## **6. Forest removal and forest waste**

- 6.1 If forestry is present on the site, the site layout should be designed to avoid large scale felling, as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality.
- 6.2 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](#).

## **7. Pollution prevention and environmental management**

- 7.1 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) and our [water run-off from construction sites webpage](#) for more information.
- 7.2 The discarding of materials as waste should be avoided. However, if there is an intention to discard materials then further guidance on this may be found in the document [Is it waste - Understanding the definition of waste](#).

Aberdeen International Airport Limited  
Dyce, Aberdeen  
AB21 7DU  
Scotland

T: [REDACTED]  
W: aberdeenairport.com

FAO Shafharia Khataza  
Local Energy and Consents  
Scottish Government

*Via Email*

ABZ Ref: ABZ3283

4<sup>th</sup> October 2024

Dear Shafharia

**Ref: REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION  
FOR KINTORE TO TEALING 400 kV OVERHEAD LINE**

I refer to your request for scoping opinion received in this office on 18<sup>th</sup> September 2024.

The scoping report submitted has been examined from an aerodrome safeguarding perspective and we would make the following observations:

- The proposed site is located partially within the obstacle limitation surfaces and instrument flight procedure surfaces safeguarding zones for Aberdeen Airport and as such aviation impacts should be considered as part of the EIA.

Our position with regard to this proposal will only be confirmed once the development details are finalized and we have been consulted on a full planning application. At that time we will carry out a full safeguarding impact assessment and will consider our position in light of, inter alia, operation impact and cumulative effects.

Yours Sincerely

REDACTED

Kirsteen MacDonald

Safeguarding Manager  
Aberdeen Airport  
07808 115 881  
[REDACTED]



----- Forwarded message -----

**From:** "Aberlemno and District Community Council" REDACT

**Sent:** Wed, 9 Oct 2024 at 17:36

**Subject:** Re: 240918 - Consultation Email to Consultee - Request for Scoping Opinion for proposed Section 37 Application for Kintore to Tealing 400kV Overhead Line

On behalf of Aberlemno and District Community Council I would comment on tube Scoping Opinion for Proposed Section 37 Application for Kintore to Tealing 400kV overhead line:-

All assessments should include locally designated sites as well as national and international designations. Assessment should include cumulative impact of existing and proposed energy infrastructure such as the next 400kV line, and ancillary works. Assessment should extend beyond pylon corridor as appropriate.

#### Topic Headings

##### 1. Landscape and Visual

- impacts extensive farmland and foothills of the Angus Glens therefore visual impact can be significant. Avoid skyline; communities and dominating views from roads, viewpoints and properties. Proposed viewpoint analysis should be clear on why specific locations were chosen. Discuss these with residents, visitor attractions, HES etc. to ensure appropriate locations are identified. Views from outwith the narrowly defined corridor should be considered e.g. hill forts on Finavon and Caterthuns; other historic sites; footpaths and leisure routes; water activity sites.

##### A. Cultural Heritage

- this area has a wealth of culturally significant sites, not all of which are designated. These should all be identified following consultation with residents, businesses and relevant organisations. Impact on designed landscapes and locally important sites to be included.

##### 3. Ecology and Nature Conserve

- include locally designated sites as defined by Angus Council. Need to identify species in the area and address potential disruption to breeding/feeding/routes. Species known who exist and be vulnerable to human interference include raptors; water vole; badger; red squirrel; wild cat; line marten and otter. Address migratory species and this outwith but affected by development within the corridor. Identify opportunities to retain, enhance and create green network and biodiversity corridors.

##### 4. Ornithology

- identify and assess species distribution: breeding and feeding sites and flight paths to and from them. Identify migratory species and their flight paths affected.

##### 5. Hydrology; Hydrogeology; Geology and Soils

- address flooding, potential scouring and impact on water courses (including those only evident in times of extreme weather. Field drains are vulnerable to heavy machinery therefore identify these and their condition - will these be negatively impacted. Identify land quality, loss and impact on farm viability. Impact on peat and permeability which might impact water retention. Assess compaction including impact on filtration in terms of flooding but also soil structure, fertility and water logging.

#### 6. Traffic and Transport

- all transport routes to and within the project area, including to individual pylons. Laying down space and traffic impact on residents and businesses.

#### 7. Land Use

- potential impact on agriculture including loss of land and food scarcity; visibility: biosecurity: site access works and restoration: access for maintenance and repair and compaction/damage to drains. Tourism and leisure is a major land user. Potential impact on property prices and development opportunity.

#### 8. Socioeconomics; Recreation and Tourism

- importance of outdoor activities, peace and scenery to the local economy - assess impact on attractions and visitor facilities using surveys to reach more distant visitors. Identify and assess potential impact on agriculture, processing and minerals. Identify and assess impact on outdoor activities including walking, cycling, water sports, fishing and shooting, and leisure flying - be sure to include local users and clubs. Identify and quantify opportunities for local contracts, training and employment from the project

#### 9. Population and Human Health

- identify and publish a range of health studies demonstrating recent findings - both positive and negative with independent assessment of the findings. Impact on financial and mental wellbeing of proximity to pylons. Impacts and mitigation of increased traffic, lorry movements, storage yards including dust, noise, road safety (all users) and property/businesses.

#### 10. Air Quality and Climate Change

- identify and assess all impacts over the life of the project including raw materials extraction; processing and manufacture; shipping and transport. Actual not theoretical output and carbon savings - regional, national and local impact. Energy loss during transportation. Associated costs including battery storage, land loss, sub stations etc required by this project.

This submission reflects the concerns of residents and business raised with individual Community Councillors of at a public meeting in Aberlemno. It is extensive but not exhaustive.

If you have any queries please do not hesitate to get in touch,

Isabelle Davies  
 Planning Contact  
 Aberlemno and District Community Council

By email to: [EconsentsAdmin@gov.scot](mailto:EconsentsAdmin@gov.scot)

8<sup>th</sup> October 2024

Dear Sir/Madam,

**Re: Kintore to Tealing 400kV OHL ECU00005225**

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.

I am pleased to note the Applicant has identified known rights of way and designated core paths. It should also be acknowledged in the EIAR and Access Management Plan that these routes may be used by a variety of non-motorised users, including horse-riders, and appropriate consideration given to how access for all path users will be managed during both construction and ongoing maintenance.

The applicant also notes there are many areas of woodland scattered throughout the Proposed Route. Woodland tracks and rides are often ideal routes for equestrians and the applicant should be aware of their potential use.

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 Angus and Aberdeenshire. 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 two and from the 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.

**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 and Aberdeenshire are areas 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 to Drivers of Large Vehicles

The  
British  
Horse  
Society  
Scotland

Horses are normally nervous of large vehicles, particularly when they do not often meet them. They can run away in panic if they are really frightened. Whilst their riders will do all they can to prevent this, should it happen, it could cause a serious accident for other road users, as well as for the horse and rider.

In such a situation, the main factors causing the fear are:

- Being approached by something which is unfamiliar to them and intimidating
- A large moving object, especially if it is noisy
- Lack of space between the horse and the vehicle
- The sound of the vehicles air brakes
- Anxiety on the part of the rider

### How can you help?

- On seeing a rider, or riders, approaching – please slow down and be prepared to stop if necessary.
- Be aware that the sound of your airbrakes may spook the horse.
- If the horse, or horses, show signs of nervousness as you get closer, please turn the engine off and allow them to pass.
- Please don't move off again until the riders are well clear of the rear end of the vehicle.
- If you are approaching riders and wishing to overtake them, please approach slowly, or even stop to give the rider's time to find a gateway, or other place off the road, where they can take refuge and create sufficient space between the horse and vehicle. Horses are very aware of things coming from behind, due to the position of their eyes.
- Please be patient. Most riders will do their best to reassure their horses even though they may be feeling a high degree of anxiety themselves.
- Note: the safest place for the rider's hands is on the reins, so if they are anxious, they may only be able to nod their thanks to you – but please do be assured that they will be very, very grateful for your consideration of their situation.

**THE BRITISH HORSE SOCIETY IS VERY GRATEFUL TO ALL DRIVERS WHO ARE WILLING TO FOLLOW THESE GUIDELINES.**

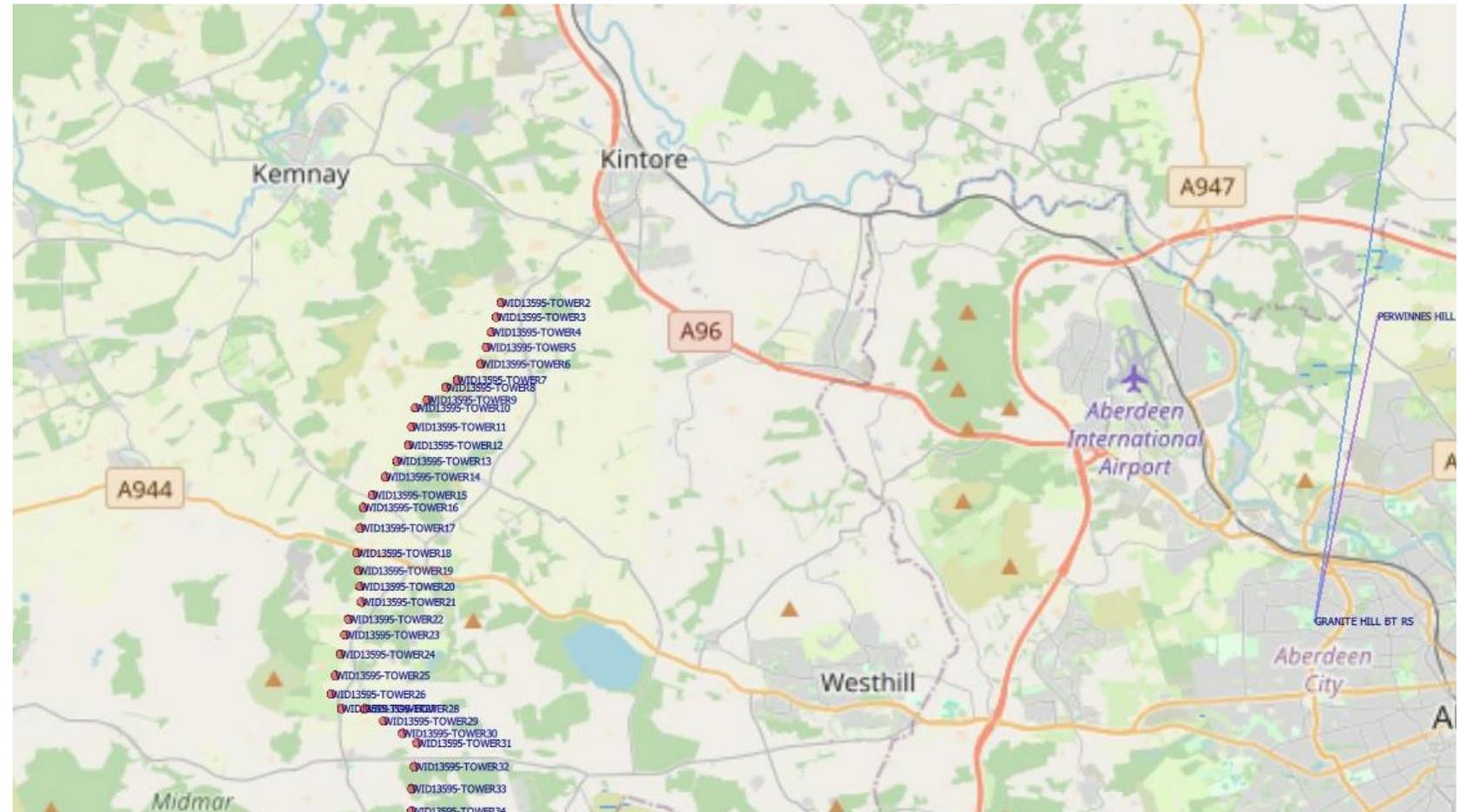


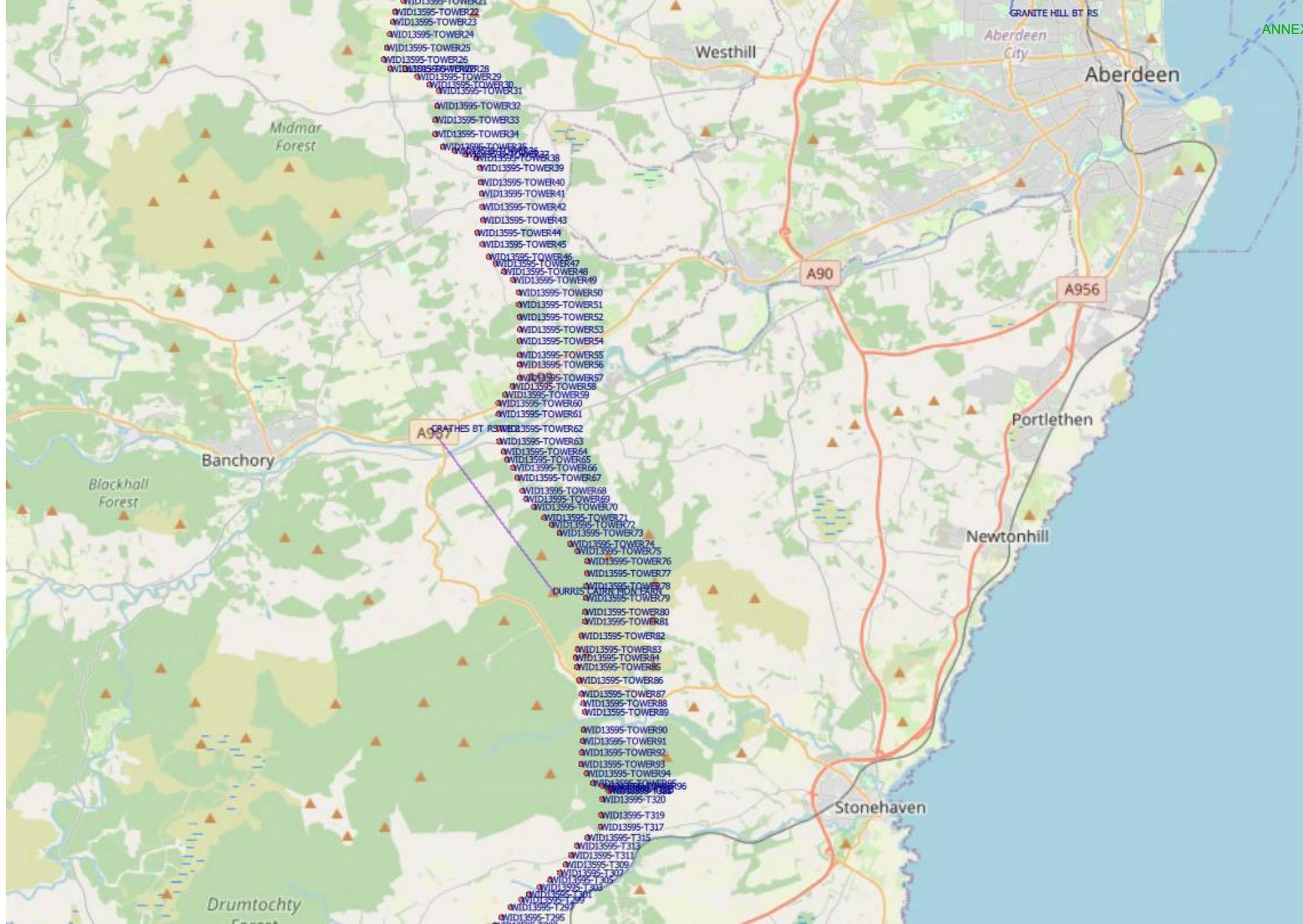
OUR REF:- WID13595

We have studied the proposed tower positions with respect to EMC and related problems to BT point-to-point microwave radio links.

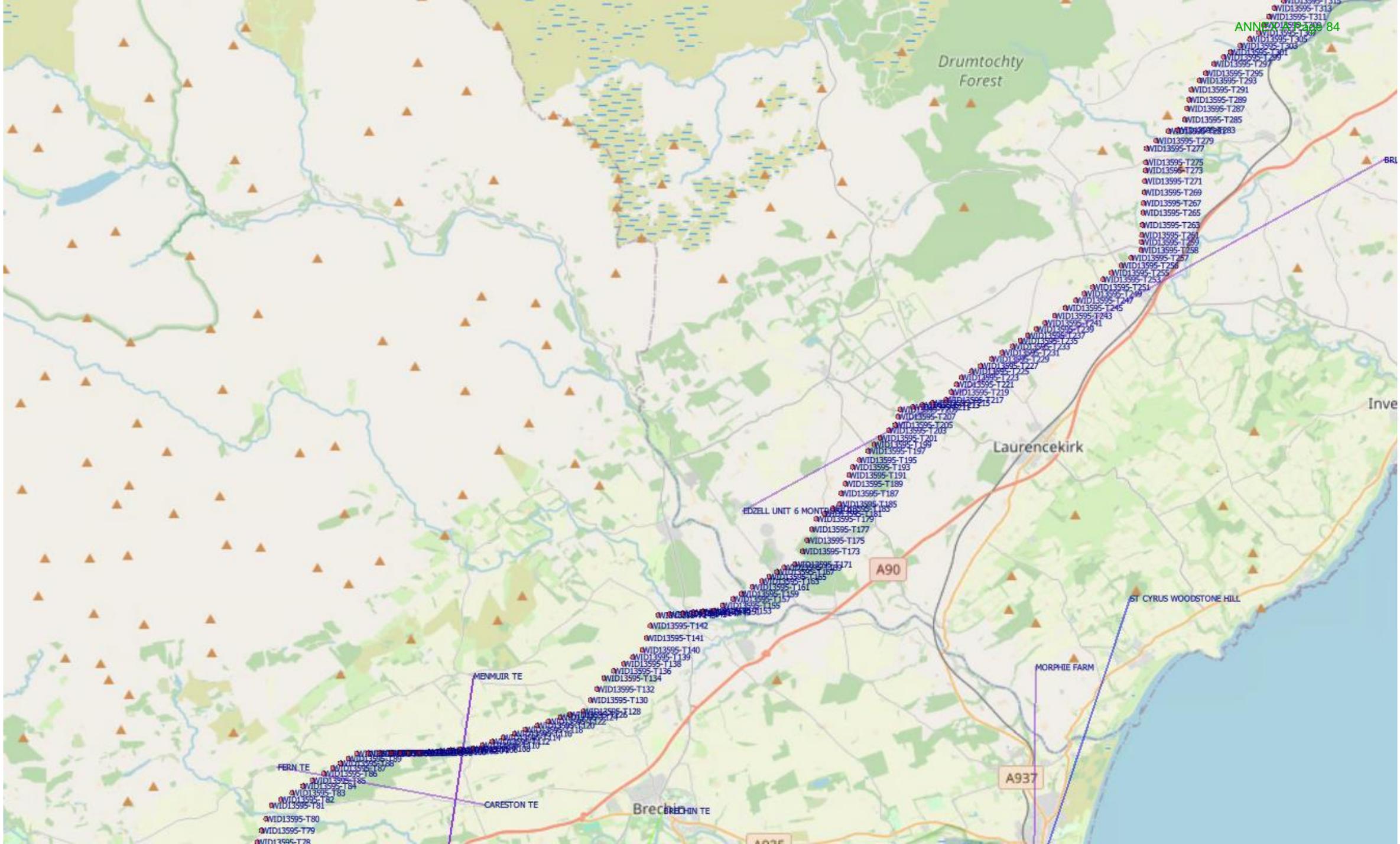
The conclusion is that the Project indicated should not cause interference to BT's current and presently planned radio network.

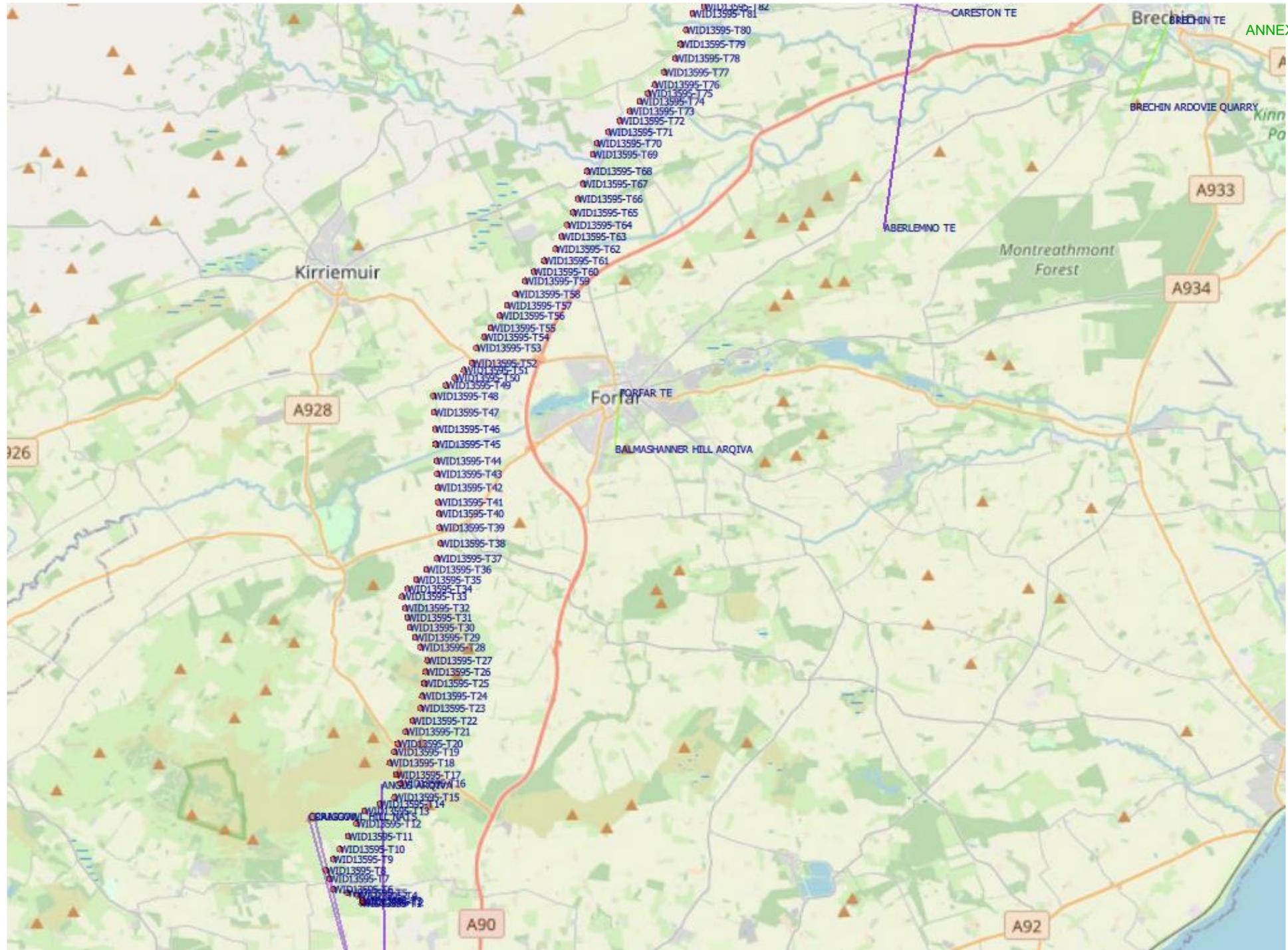
However, some of the tower positions are very close to BT links, therefore if they do change, please inform us so we can re-assess.





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**From:** [Emma Bryce](#)  
**To:** [Shafharia Khataza](#)  
**Cc:** [Planning](#)  
**Subject:** RE: 240918 - Consultation Email to Consultee - Request for Scoping Opinion for proposed Section 37 Application for Kintore to Tealing 400kV Overhead Line  
**Date:** 01 October 2024 14:27:50  
**Attachments:** [image001.png](#)

---

Good afternoon Shah,

Thank you for consulting CNPA with this request for a Scoping Opinion. I would confirm that CNPA has no comments to make regarding this,

Kind regards

Emma

**Emma Bryce** (she/her)  
Planning Manager (Development Management)

T: 01479 870 564

E: [REDACTED]

Usual working hours: Monday to Thursday



**Cairngorms National Park Authority /**  
**Ùghdarras Pàirc Nàiseanta a' Mhonaidh Ruaidh**  
14 The Square | Granttown on Spey | PH26 3HG  
[REDACTED] | [cairngorms.co.uk](http://cairngorms.co.uk)

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Read our plan for the future: [cairngorms.co.uk/PartnershipPlan](http://cairngorms.co.uk/PartnershipPlan)

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## Crathes Drumoak Durris Community Council Opinion on Scoping Report Proposal for SSEN Kintore to Tealing 400kV OHL

**Land use:** Agricultural land management and changes to other land use including properties not deemed significant so scoped out.

**Opinion:** We disagree as the land take for these overhead lines is significant and will impact the operability of some farms. Biosecurity needs to be given much more attention, especially on agricultural land.

**Effects on users of paths, cycle routes, tourism and recreational fishing** are scoped out.

**Opinion:** The Dee Valley is a Special Landscape Area and internationally important with thousands of tourists travelling long the A93, including from cruise ships, to view the countryside. Fishing on the Dee is important business locally, bringing in much income and as such the impact of this proposal should be included in the EIA.

**Landscape and Visual Amenity:** Assessment on visual effects at night on landscape character, visual amenity are scoped out for construction and operation.

**Opinion:** This is challenged as the area is an important one for viewing the aurora borealis. There are numerous points where a very good view of the northern horizon can be found. A massive pylon line across the countryside would have a detrimental effect and so the visual impact at night should be in the scope of the EIA.

**Cultural Heritage:** Direct and indirect effects on cultural heritage from hydrological change or vibration and seismic events scoped out. Assessment of direct operational effects from maintenance or replacement works are to be scoped out.

**Opinion:** Water tables and drainage will be affected by the construction of these pylons, impacting historically significant sites like wells, of which there are many in the area. Noise from the lines disturbing the peace at archaeological sites will be significant and so this should remain in scope of the EIA.

**Ecology:** Pearl mussels are scoped in but not Atlantic salmon. Construction impacts scoped out. Operational impacts on habitats of conservation concern and protected and notable species are scoped out.

**Opinion:** Ecology during construction and operation should be within scope as the disruption of habitats will be significant for a number of species of conservation concern. Atlantic salmon are sensitive to EMF and should also be considered in scope. The Dee Valley is designated as a Special Landscape Area and so the ecology of the area must be within the scope of the EIA.

**Hydrology etc:** Effects on surface water quality, PWS, Groundwater abstractions and GWDTE during operation and effects on peat and other soils during operations are scoped out.

**Opinion:** This is challenged as watercourses, PWS and water tables will all be impacted by construction. This is significant to both local residents and wildlife and so should remain in scope so that the impact is adequately assessed, recognised and addressed.

**Traffic and Transport:** Scoped out during operation and maintenance

**Opinion:** This should remain within scope as operational and maintenance activities will require heavy machinery and access to the towers, with the associated noise, ground disturbance and CO2 pollution.

**Noise & Vibration:** construction noise and vibration in, not during operation.

**Opinion:** EIA regs require noise emitted to be included and so emissions of corona discharge and aeolian noise should be within scope. There is plenty evidence that noise from OHL power lines causes nuisance to residents.

Since SSEN has been served with a noise abatement notice for a substation on Beaulieu to Denny, it is clear the estimating methods are underestimating operational noise.

An accurate noise impact assessment needs to be part of the submission for both construction and operation.

Construction hours are excessive and should be limited to 5 days/week, 10hrs/day to allow local residents respite.

**Telecomms and Aviation:** Scoped out

**Opinion:** BT require further information so any potential disruption to signals needs to be assessed and addressed, telecoms should remain in scope. The area already has issues with signal coverage and the addition of further disruptors needs to be fully assessed.

**Socio-economics:** scoped out – must be submitted separately as this is a major concern for local communities.

**Landscape and Visual Amenity:**

Revised study area of 3km (initially 10km) proposed for cumulative effects (Landscape and Visual Impact Assessment and Zone of Theoretical Visibility)

**Opinion:** Visual impact is based on an average pylon height of 52m, not actual or maximum height (70m). “significant effects on landscape character and visual amenity are likely to occur beyond 3km from the OHL (5.1.7)’ so visual impact should be assessed up to 5km given pylons up to 70m high.

Viewpoint list – add viewpoints at the keep of Drum castle and back gate to Drum Castle

In addition, community members have asked that the following viewpoints are added:

57.071424, -2.380588

57.114286, -2.38919

57.071251. -2.381294

Newhall, 57.094239, -2.378729

Miekle Eddieston, 57.113283, -2.338989

Drum hill, 57.090674, -2.348301

Mains of Drum, 57.079107, -2.324358  
 Deeside Line crossing, 57.081820, -2.331406  
 57.08995° N, 2.35471° W (Kirsty Bailey)  
 Rosehall Cottage 57.0846943, -2.3326236  
 3 West Park Steading AB31 5AD. GPS 76430 97074  
 Broomfield Cottage, East: 377066 North: 800467  
 Upper Corskie, Dunecht, AB32 7ES Google grid: 57.179360, -2.424834  
 18 James Gregory Road 57.08557, -2.34563.  
 Viewpoint on south of Dee Valley 57°02'33.2"N 2°17'20.0"W  
 Upper Park West OS map grid ref 769 978  
 Myriewell House, Echt AB32 6UN. 57°08'42.4"N 2°25'12.5"W  
 Lochside Drumoak. 57.0767654, -2.3800940  
 Upper Park. 57.0701039, -2.3864079  
 Stirlings NO 77529 98693. East 377529 North 798692  
 Barrowsgate Cottage and House 57° 5'13.91"N 2°21'42.69"W  
 Corskie Park. 57.174429, -2.420716  
 Dunecht Primary School 57.173894, -2.418624  
 School Playing Field 57.174562, -2.418366

Properties greater than 170m from proposed development will be scoped out. This should be increased to 500m due to the height of the pylons (up to 70m)

### **Cumulative Impact**

Development proposals where a Proposal of Application Notice has been lodged are not termed as foreseeable, so not in scope.

Significant projects which are under construction at the point of carrying out the cumulative assessment would not be considered as cumulative developments, so not in scope.

**Opinion:** Contributory impacts of the same project *should* be included in cumulative impact assessment regardless of the stage of construction, otherwise the overall visual and other impacts cannot be properly assessed. Simply because a phase of a project is in a different stage of development does not negate its impact.

**Health** – adherence to ICNRP Guidelines and so scoped out.

**Opinion:** Mental health is not covered, yet the definition of health from The WHO is “a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity”. At no point does this proposal address mental health effects (already significant in the community) and so health must be kept in the EIA. NPF4 requires developments to improve health and so this must be demonstrated in the EIA.

UK Exposure limits out of line with other countries at 360 microTeslas and SSEN has a Duty of Care to protect the public from harm.

While the ICNIRP guidelines are considered not fit for purpose by many scientists

(Hardell et al, 2021), it is documented in published scientific literature that harm occurs below the ICNIRP guideline levels (Buchner et al, 2021). In support of this statement, backed by 255 scientists from 11 countries, the EU levels for safe exposure are half the amount allowed by ICNIRP (WHO).

To scope out health from the EIA because EMF exposures “should” comply with ICNIRP guidelines is not backed by science. The Scientific Committee on Health and Emerging Risks (SCHEER) working party on EMF reviewed no scientific papers on 400kv/ 6 GW in 2023, and as advisors to the United Kingdom Health and Safety Authority (UKHSA) there appears to be no data to back this claim.

Also significantly UKHSA state “importantly there is **no known mechanism** or clear experimental evidence to explain how these effects might happen.” However, this **contradicts published scientific evidence**- including that reviewed in 2023, by SCHEER. Ten papers studied by SCHEER were on this subject- making the **mechanism** of harm **clear** in published science (Halgamuge et al, 2013; Giorgi et al, 2021; Panagopoulos et al, 2021).

ICNIRP guidelines are to govern acute effects of EMF & not long term effects (Laakso et al, 2012). They are also not fit for purpose when the effects of SSEN’s plans on mental health are considered. This is significantly seen within the community, even at this stage in proceedings, partly caused by SSEN’s false reporting of the effects on house prices (Naurud et al, 2012). This means people are stuck, anxious about living near pylons, due to four decades of research showing this association with ill health, but unable to sell their homes as the public perception of this risk is high, a planning consideration in its own right (Kriebel et al, 2001). ICNIRP guidelines also do not cover the effects of noise or other polluting factors from these plans (Meyer et al, 1989; Halgamuge et al, 2013).

In conclusion to “scope out” health from this document as these plans “should” comply with ICNIRP guidelines is wilfully disregarding the depth & breadth of negative effects these plans will have on the health of those who will have to live adjacent to these pylons, carrying four times the power than studied to date.

**Climate Change** Proposal would not be predicted to adversely interact with climate change responses  
Scoped out.

**Opinion:** It is unsatisfactory to refer to NPF4 and assumptions that as part of Strategic Renewable Electricity Generation and Transmission Infrastructure the negative climate effects of this proposal are no more than minor in significance. The CO2 impact of this proposed OHL has not been compared with other technological solutions that are available for the export of power from the North East of Scotland such as subsea HVDC. The CO2 generated for the entire project, from mining of materials; production of steel, concrete and aluminium; use of fossil-fuelled blast furnaces; transportation of materials round the world; thousands of vehicle movements; disturbing ground and

peat; felling thousands of trees, and decommissioning needs to be compared with that of continuing to use fossil fuels from already existing infrastructure to ensure that the project will be an environmental net benefit. Furthermore, the choice of technology, an OHL, needs to be demonstrated as the most environmentally friendly solution for transmission. Other lower-carbon solutions may well be available. The Net Zero date of 2030 is an arbitrary deadline and should not be prioritised over environmental impact. As such Climate Change should be included in the EIA so that it can be demonstrated that this project delivers a reduction in carbon output compared with continuing to use existing infrastructure to burn fossil fuels. The first law of the environment is re-use.

The impact on the vulnerability of the infrastructure to climate change should be included as there is a lot of local experience of lengthy power outages during severe weather.

The second point relates to the scoping out of Climate Change in the request. This will likely be one of the first scoping requests dealt with by the Energy Consents Unit since the landmark ruling in *Finch vs Surrey County Council* in the Supreme Court in June 24. Whilst this judgement relates in its detail to oil and gas development, the principles will be applicable across all large infrastructure development proposals that carry potentially significant carbon footprints. It cannot be enough for SSEN simply to continue asserting that this project needs no assessment because it is helping the UK meet its climate targets. The judgement appears implicitly to call for a reappraisal of the requirements imposed under NPF4. This scoping request represents an early opportunity for ECU to make a clear public statement about how it expects upstream, downstream and supply chain emissions to be quantified in the context of electricity infrastructure applications. For example, are such developments now required to include an assessment of the GHG footprint of individual generating/storage infrastructure projects that will only be possible if such a line upgrade were to go ahead? Such clarity on the implications of the judgement at this stage may prevent the whole system becoming bogged down in further legal argument at the point where applications are submitted.

Another area not included is decommissioning. Offshore oil and gas infrastructure has to plan how decommissioning will be done at the outset and the operator has to put financial guarantees in place.

SSEN argue the life span of OHL is 80 years and thus so far away in time it is not worth analysing. The justification for the line is to transmit wind generated power with turbines having a 15 to 20 year lifespan. It is thus feasible that the OHL could become redundant long before 80 years. The method of decommissioning, including removal of foundations or compensating landowners if left in place should be scoped in. The decommissioning will cause the same amount of disruption as the construction. The question of who pays remains. The logic for other infrastructure is that the polluter pays.

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World health organisation, Magnetic fields, Geneva: WHO, 1987. Environmental Health criteria 69.

World Health Organization, 2007. Environmental health criteria 238: extremely low frequency fields. *Geneva: World Health Organization*.

**Demi Gray**

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**From:** Joshua Dickson [REDACTED]  
**Sent:** 30 October 2024 10:36  
**To:** Econsents Admin  
**Subject:** RE: 20241023 - Consultation on SSEN Transmission East Coast 400kV Phase 2 - Route Options, Kintore-Fiddes-Tealing 440kV OHL Connection - your feedback is sought

Hello

I confirm that the assets of Crown Estate Scotland are not affected by this proposal at Kintore to Tealing, and we therefore have no comments to make.

Josh

**Joshua Dickson (he/him)**  
**Assistant Portfolio Co-ordinator**

**Crown Estate Scotland**

t: 0131 260 6075 / 07880 357938

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**From:** Joan McGrogan  
**Sent:** Tuesday, October 1, 2024 10:05 AM  
**To:** Toby Metcalfe [REDACTED]  
**Subject:** 20241001 - Consultation on SSEN Transmission East Coast 400kV Phase 2 - Route Options, Kintore-Fiddes-Tealing 440kV OHL Connection - your feedback is sought

Good morning Toby

I refer to Olivia's email of 18<sup>th</sup> September 2023 and later emails requesting your comments. I can't find a response from you.

We have received a further email from SSEN, please see the attached.

I would be grateful if you could provide your feedback before 21<sup>st</sup> November 2024.

Thanks

Kind regards

Joan.  
**Joan McGrogan (she/her)**  
**Portfolio Co-ordinator**

**Crown Estate Scotland**

t: [REDACTED]

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**From:** Olivia Morrad

**Sent:** Monday, April 29, 2024 12:52 PM

**To:** Toby Metcalfe [REDACTED]

**Subject:** 20240429 - Consultation on SSEN Transmission East Coast 400kV Phase 2 - Route Options, Kintore-Fiddes-Tealing 440kV OHL Connection - your feedback is sought

Toby,

I have received the attached email from SSE regarding the proposed overhead lines from Kintore to Tealing.

Could you let Joan or I know if you have received a response from Tenants highlighted below?

Many thanks

**Olivia Morrad**  
**Assistant Development Manager**  
**Crown Estate Scotland**

[REDACTED]

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**From:** Olivia Morrad

**Sent:** Monday, March 25, 2024 5:14 PM

**To:** 'Toby Metcalfe' [REDACTED]

**Subject:** 20240325 - Consultation on SSEN Transmission East Coast 400kV Phase 2 - Route Options, Kintore-Fiddes-Tealing 440kV OHL Connection - your feedback is sought

Toby

I've not received a response from you in regards to this enquiry – have you responded direct?

I attach a new email from SSE.

I will forward on other enquiries which I've not had a response to.

Many thanks

**Olivia Morrad**  
**Assistant Portfolio Co-ordinator**

## Crown Estate Scotland

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**From:** Olivia Morrad

**Sent:** Monday, September 18, 2023 9:30 AM

**To:** Toby Metcalfe <[REDACTED]>

**Subject:** 20230918 Consultation on SSEN Transmission East Coast 400kV Phase 2 - Route Options, Kintore-Fiddes-Tealing 440kV OHL Connection - your feedback is sought

Good morning Toby

I hope you are well.

The route for this OHL crosses the following agreements :-

Lease_Ref	GIS_File_Ref	Lease_Description	Tenant_Name	Property_Classification
77058221	SAL62(2)	Glenbervie etc&Balmakewan Etc	Laurencekirk & District	River
00004562	SAL61(2)	Luther Water Drumnagair	J Alexander	River
00014811	SAL213	River Cowie	Stonehaven & Dist.Angling Assc	River
00007223		River Bervie & Carron	Stonehaven & Dist.Angling Assc	River
77300027	CRF36 (2)	Rvr Don at Kintore	Kintore Angling Club	River

I would be grateful if you could request comments. The deadline for this has passed, but, I have liaised with SSE on this.

Kind regards

Olivia

**Olivia Morrad**  
Assistant Portfolio Co-ordinator  
Crown Estate Scotland

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**From:** Muckley, Albert <[REDACTED]>  
**Sent:** Thursday, May 11, 2023 10:36 AM  
**To:** Muckley, Albert <[REDACTED]>  
**Subject:** Consultation on SSEN Transmission East Coast 400kV Phase 2 - Route Options, Kintore-Fiddes-Tealing 440kV OHL Connection - your feedback is sought

**! CAUTION !** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

On behalf of SSEN Transmission, I am writing to invite your feedback, as part of our formal consultation process, on the Route options associated with the new Kintore – Fiddes – Tealing 400kV overhead line (OHL) connection which forms a part of the East Coast 400kV Phase 2 project.

We are seeking your feedback by **9th June 2023**. If you require additional time to respond, please let me know.

### Project Summary

SSEN Transmission is proposing to establish a network of 400 kilovolt (kV) electricity transmission infrastructure across the northeast of Scotland. This is needed to provide greater capacity and flexibility for the transmission of electricity generated in the north of Scotland, in particular from the increasing number of offshore wind farms and to help meet the Scottish Government's energy and Net Zero targets.

A key part of the infrastructure upgrade is the proposed new 400kV OHL approximately 106 km in length, which will connect the existing Kintore Substation with a proposed new 400 kV substation at Fiddes, in Aberdeenshire and continue south to connect to a proposed new 400kV substation at Tealing, in Angus.

We have completed a comparative appraisal of a series of alternative route options within which the new OHL could be developed. The findings of that appraisal are presented in the Route Selection Consultation Document available at the link below:

[Kintore-Fiddes-Tealing 400kV OHL Connection - SSEN Transmission \(ssen-transmission.co.uk\)](http://ssen-transmission.co.uk)

### Consultation

Over the coming months SSEN Transmission will continue to engage with Statutory Consultees and stakeholders to further understand constraints and identify potential opportunities.

Public consultation events have commenced and include face to face and virtual consultation. Details of the events and project documentation, including a public consultation booklet covering all East Coast Phase 2 projects, are available at the link below.

[Kintore-Fiddes-Tealing 400kV OHL Connection - SSEN Transmission \(ssen-transmission.co.uk\)](http://ssen-transmission.co.uk)

### Other Consultation

In parallel SSEN Transmission is also consulting on Corridor options for the OHL and two proposed new 400kV substations at Fiddes and Tealing. Links to Consultation Documents for these projects are provided in section 1.1 of the Route Selection Consultation Document at the link above.

Thank you for taking the time to read this email and consider this request for feedback. As noted above, please let me know if you require additional time to respond or if you have any queries.

We look forward to receiving your feedback by 9th June.

Yours faithfully

Albert

**Albert Muckley** BSC(Hons) MSC MRTPI | Consents & Environment Manager (East and Argyll Region)  
Inveralmond House, 200 Dunkeld Road, Perth, PH1 3AQ

Teams: [REDACTED]  
Mobile: [REDACTED]  
[www.ssen-transmission.co.uk](http://www.ssen-transmission.co.uk)



*I've sent this message at a convenient time for me. Please respond during your working hours.*

*Advance Notice of Annual Leave: 19<sup>th</sup> May 2023.*

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# Defence Infrastructure Organisation

Wendy Talbot  
Ministry of Defence  
Safeguarding Department  
St George's House  
DIO Headquarters  
DMS Whittington  
Lichfield  
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WS14 9PY

Your Reference: ECU00005225

MoD Telephone: [REDACTED]  
E-mail: [DIO-safeguarding-statutory@mod.gov.uk](mailto:DIO-safeguarding-statutory@mod.gov.uk)

Our Reference: DIO10059874

Shafharia Khataza  
Energy Consents Unit  
Scottish Government  
5 Atlantic Quay  
150 Broomielaw  
GLASGOW  
G2 8LU

1 October 2024

Dear Shafharia

## **MOD Safeguarding – SITE OUTSIDE SAFEGUARDING AREA (SOSA)**

**Proposal:** Request for a scoping opinion for the proposed section 37 application for the Kintore to Tealing 400kV Overhead Line; the installation of approximately 106km of double circuit 400kV overhead line, supported by steel lattice towers

**Location:** Kintore, north west of Aberdeen to Tealing, north of Dundee

<b>Grid Ref:</b>	North – Kintore	Easting: 377124	Northing: 814308
	Mid – Hurlie	Easting: 378945	Northing: 786012
	South – Tealing	Easting: 338773	Northing: 737692

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office.

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.

The application is for a Scoping Opinion Request for 106km of 400kV overhead power lines on towers with an average height of 57m.

### **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 flying. 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 will require that a condition is added to any consent issued requiring sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.

At this consultation stage, where details for the final route, design and/or maximum height of the proposed development have not been determined, MOD representations are limited to the principle of the development only. In summary the MOD has concerns, and should be consulted at all future stages for this proposed development to complete a full detailed safeguarding assessment.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents titled "Site Location Plan" and "Environmental Impact Assessment (EIA) Scoping Report" dated August 2024 and September 2024 respectively. 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

Wendy Talbot  
Assistant Safeguarding Manager  
DIO Safeguarding

**INVERESK COMMUNITY COUNCIL**  
**OPINION ON PROPOSED SECTION 37 APPLICATION**  
**KINTORE TO TEALING 400kV OHL EIA**

There are real questions about whether this OHL is actually needed and whether a sub-sea HVDC cable from Peterhead/Kintore area to Westfield substation would be a better, and probably cheaper, solution to the problem of getting the power from where it is generated to where it is wanted. There is a general feeling that NE Scotland is being sacrificed, and its farming seriously endangered, mainly for the benefit of England. We also feel that the cost to individual homeowners in the depreciation of their house values has not been properly taken into account, if at all.

That aside, we have a few specific comments regarding the proposed alignment of the OHL across the Inveresk Community Council area (ie parts of Sections B & C) and the its EIA:

Table ES.1:

We feel that an attempt should be made by both SSEN and Balfour Beatty to calculate the amount of greenhouse gases which will be created by the manufacture and installation of the OHL in this project which will destroy a huge tract of Scottish countryside. Although it is sold as being required to transmit "Green Energy" the whole OHL project is far from Eco-friendly. In addition, some assessment should be made regarding the Physical and Mental Health concerns of those who will be affected by the OHL, in particular, how the EMF may impact on children living close to the OHL and how the industrialised views will depress people. Many have moved to this area to enjoy the wide open natural landscapes.

Table 6.4:

We note that the Caterthun Iron Age Hillforts are not included in your Preliminary Cultural Heritage Viewpoints List. These are part of the Heritage of Scotland and are well-visited by locals and tourists alike. The proposed OHL will diminish the views from these hilltops. There is a list below of other viewpoints which we feel should be included in the Section 37 application.

Options at Section B, Location 4:

We request that Alternative Alignment 4c or 4e is selected as there known to be a badger sett in rewilded woods near Lochty Farm/Coe. The other options here would significantly destroy those woods. Of course, we are concerned about this OHL's impact on local wildlife in general and this barely gets a mention. Also, it is felt that the number of dwellings (over 25) within about 100m of the OHL in option 4a has been underestimated.

Centre of Section B:

As soon as this project was announced, the residents of Inchbare started to protest loudly. Inchbare is between Brechin and Edzell on the B966 and lay under every option presented. Has any consideration been given to realigning the OHL to be further from these houses? Now that most of the trees between Inchbare and Edzell have been removed, following serious storms, there would appear to be the chance to move the OHL another 200m or more further north of Inchbare.

Other Viewpoints:

The effect of the proposed OHL on local scenery and hence tourism will be dramatic. In addition to the views from the Caterthuns, we feel that viewpoints selected to show the impact should include the following:

Lochty & Lochty Cottages: Depending on the Careston alignment chosen these houses might lie under or very close to the OHL.

Montboy Cottages: Similarly, almost all the Careston options will have the line very close to these houses with no screening of the pylons.

Careston & Waterstone: Pylons will be obvious from all over the Careston Estate.

Inchbare: As previously mentioned the intended OHL will be just north of this hamlet but could be moved a little nearer to Edzell Village as the intervening forests have now been removed following severe storms.

Fern to Tigerton (C30) & Tigerton to Edzell: These roads are well used by tourists because of the lovely views down over the countryside to the south east. The proposed OHL will ruin these views.

Agriculture:

The placement of high voltage infrastructure on prime agricultural land poses significant risks to future food security. There is significant concern among the farming community that EMF generated by the cables may render GPS-based technologies inoperable, or severely limited. Such technologies are increasingly vital for modern agriculture to meet rising food demand, namely precision farming to optimise yields. In particular the use of drones for seeding and spraying and autonomous vehicles are likely to be severely limited. Potatoes require irrigation during dry periods but the use of sprayers under high voltage OHLs is strictly avoided for Health and Safety reasons. This is particularly important as Scotland produces 70% of the UK's Seed Potatoes and more than half of these are from the North East.

Endangered Species:

There is no comprehensive assessment in the EIA with respect to wildlife in the proposed corridor. This is both surprising and concerning. We have already mentioned the presence of Badgers but Angus is a stronghold for several highly protected species, including Pine Martens and Scottish Wild Cats. The region's ecosystems have been severely impacted by major named storms in the last 2 years (eg Arwen) leading to significant habitat loss and the resulting displacement of such protected wildlife which have sought refuge in new territories. It is understood that the Scottish Wild Cat is listed under Schedule 5 of the Wildlife and Countryside Act of 1981 and in Annex IV of the European Union Habitats Directive and relocation of Scottish Wild Cats is not a practical solution. The proposed 400kV OHL would significantly impact these species, particularly during the prolonged construction phase, probably leading to their local extinction. A thorough and up-to-date assessment of the potential impact on these vulnerable, highly valued populations is essential to prevent further disruption and ensure their long-term survival.

Poor Biosecurity:

There is very little mention of Biosecurity and great local concern regarding the potential for this project to widely distribute Potato Cyst Nematode (PCN) and Clubroot. As previously mentioned, this and the wider area of North East Scotland, are nationally important for producing Seed Potatoes. More PCN would destroy this industry while Clubroot seriously effects Brassica (including Oilseed Rape and Turnips). Even hill farms occasionally allocate a field to grow turnips for their sheep or cattle and rape is a widely grown short-term cash crop on many arable farms. A linear development such as an OHL would be the most efficient way to spread either PCN and Clubroot, were that SSEN's intention.

Although both SSEN & Balfour Beatty recently revised their Biosecurity Protocols, experts tell us that these would still be insufficient to prevent the rapid spread of both PCN, Clubroot and invasive species. In addition, in observation of the work presently underway to upgrade the existing OHL to Tealing through the Inveresk area from 275kV to 400kV, there was no evidence of any biosecurity measures being applied at a site which was observed daily. A new track was constructed to get to one pylon which needed substantial reinforcement of its base. This work, over several weeks, involved many quarry trucks, diggers, quad bikes, cement lorries, etc entering and leaving fields on a daily basis. Their wheels weren't even sprayed with water as they left roadways or rejoined them. Since then, various vehicles have accessed the same pylon to prepare for the 400kV cables, again without any measure of biosecurity. It appears that Biosecurity Protocols are simply being ignored.

REDACTED

Sqn Ldr G Leighton  
BSc PGCE RAF (retired)  
Chairman of  
Inveresk Community Council.

**Demi Gray**

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**From:** JRC Windfarm Coordinations Old <windfarms@jrc.co.uk>  
**Sent:** 08 October 2024 21:24  
**To:** Shafharia Khataza  
**Cc:** Econsents Admin; Louise Gunstensen; Wind SSE  
**Subject:** Kintore to Tealing 400kV Overhead Line - ECU00005225 [WF493275]

Dear shafharia,

A Windfarms Team member has replied to your co-ordination request, reference **WF493275** with the following response:

*Dear Sir/Madam,*

*Thank you for your advisory regarding the proposed Overhead Line (OHL) development:*

**Project Name: Kintore to Tealing 400kV OHL**

**ECU Number: ECU00005225**

*We have reviewed the current proposed OHL tower locations and have identified that numerous towers have the potential to cause interference with fixed links and point to multipoint links operated by the local Distribution Network Operator (DNO).*

*Based on this assessment, we advise that final tower positions are agreed upon and confirmed to no longer pose an obstruction.*

*We are happy to assist with this coordination.*

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*It is crucial to note that any changes to the development details, particularly the positioning or scale of any towers, will necessitate a re-evaluation of the proposal. We will require precise grid references for the final tower locations to ensure they do not interfere with existing infrastructure.*

*Our assessment is based on the best available data and known interference scenarios. However, we recognize that there may be unforeseen or inadequately predicted effects. Therefore, we cannot be held liable if unforeseen issues arise that we have not predicted.*

*Please note that our objection pertains only to the date of this issue. Given the dynamic nature of the spectrum use, you are advised to seek re-coordination before submitting a final planning application. This step will help mitigate the risk of objections arising from any new developments between your initial enquiry and the finalization of your project.*

*If you require any further assistance or have any questions, please do not hesitate to 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*

*JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.*

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We hope this response has sufficiently answered your query.

If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email by clicking on the link below or login to your account** for access to your co-ordination requests and responses.

<https://breeze.jrc.co.uk/tickets/view.php?id=34137>

**Demi Gray**

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**From:** JRC Windfarm Coordinations Old <windfarms@jrc.co.uk>  
**Sent:** 12 November 2024 10:40  
**To:** Shafharia Khataza  
**Cc:** Econsents Admin; Glenn Waktare; Louise Gunstensen; Wind SSE  
**Subject:** Kintore to Tealing 400kV Overhead Line - ECU00005225 [WF493275]

Dear shafharia,

A Windfarms Team member has replied to your co-ordination request, reference **WF493275** with the following response:

*Hi Glenn,*

*We've had further discussions with SSE. These discussions were required to better understand how they wanted us to proceed with such projects given that the OHLs themselves are a part of the SSE group.*

*The outcome of these discussions was that, following an initial holding objection, we shall a) offer a exclusion zone report in which we would advise the areas along a proposed OHL route corridor to avoid and b) liaise with appropriate contacts from within SSE/Neos to determine what link data can be released on a case by case basis.*

*Again, more than happy to join a discussion on this topic.*

*Kind regards,*

*Jacob Chambers*

*Systems and Data Analyst*

*JRC Ltd*

*E: [jacob.chambers@jrc.co.uk](mailto:jacob.chambers@jrc.co.uk)*

*M: [REDACTED]*

*Address: Joint Radio Company Ltd Friars House Manor House Drive Coventry CV1 2TE*

We hope this response has sufficiently answered your query.

If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email by clicking on the link below or login to your**

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