
From: Alan Atkins <AAtkins@pkc.gov.uk>
Sent: 08 July 2026 13:53
To: Cane-Ritchie, Sarah <Sarah.Cane-Ritchie@sse.com>
Subject: [EXTERNAL] SSEN Substation Consultation - 26/00009/CONSUL

Goof afternoon Sarah,

Firstly, please accept my apologies for the late submission of this consultation response, I have had a particularly busy and complicated Committee cycle this month. In terms of the site selection process for the new substation, the Council is in agreement that, out of the initial twelve selected sites, Area 3 and Area 5 are the most preferred options. Furthermore, it is the opinion of the Council that the rationale for the new substation has been clearly explained and is fully understood, and that the methodology used in the site selection process is both appropriate and robust. In light of this, the Council is in agreement that Area 3 is, overall, the best option. However, PKC Tree Officer has raised concerns regarding the potential access road at Caddam Road (C436) and the requirement to have it widened in order to accommodate construction traffic. The Tree Officer's concerns centre around the 20 mature Oak trees that border the road. This aside, there have not been any concerns raised regarding the choice of Area 3. I trust that this is of assistance,

Kind regards,

Alan

Alan Atkins | Planning Officer | Major Applications | Economy, Development and Planning

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Perth & Kinross Council | Pullar House | 35 Kinnoull Street | Perth PH1 5G
Email aatkins@pkc.gov.uk | Website: www.pkc.gov.uk | 01738 475312 it is clear that site ? and site ? are the preferred options.

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Sarah Cane-Ritchie
Consents and Environment Manager
SSEN

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Our case ID: 300086737

20 May 2026

Dear Sarah Cane-Ritchie

Coupar Angus 2 - New 132 kV substation and associated infrastructure

Thank you for your pre-application consultation on the site selection for the proposed Coupar Angus 2 132 kV substation, which we received on 04 May 2026.

Proposed Development

We understand that the proposed development would comprise a new 132 kV substation in the vicinity of the existing Coupar Angus GSP, together with the associated infrastructure detailed on page 5 of the consultation document, and overhead line tie-ins connecting the new substation to the existing Clunie - Coupar Angus overhead line.

Our Advice

We advise that you request an Environmental Impact Assessment (EIA) screening opinion from the planning authority, as the proposed development may meet the criteria and thresholds in Schedule 2 of the EIA (Scotland) Regulations 2017.

We have identified potential impacts on several designated assets within our [advice-giving role](#). The Annex below contains our comments on these impacts, and our advice on supporting information to accompany any upcoming applications for consent.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Jessica Malone and they can be contacted by email at jessica.malone@hes.scot.

Yours sincerely

Historic Environment Scotland



Annex

Our Historic Environment Interests

We welcome the early consideration of cultural heritage in the site selection process.

It appears that a 1 km boundary has been applied to identify assets that may be affected, and it is unclear why. We advise assessing any physical or setting impacts that the proposals may have on designated assets within our remit. Our [Managing Change: Setting](#) guidance may be helpful in identifying assets for assessment, as setting impacts may occur beyond defined study areas. We recommend using a bare-earth Zone of Theoretical Visibility (ZTV) to support the initial assessment.

In line with our [Managing Change: Setting](#) guidance, assessments should not necessarily rely on forestry or vegetation to screen visual impacts, given the potential for vegetation clearance, felling, and windblow. The guidance also clarifies that sites do not need to be visually prominent to have a setting.

Scheduled Monuments

There is currently not enough information at this stage to determine which of the preferred site locations would be the more appropriate option in relation to scheduled monuments.

We recommend that an assessment is undertaken to consider potential impacts on the setting of scheduled monuments. We have identified the following assets which may experience setting impacts because of the development proposals:

Area 3

- SM4774 Hills of Bendochy, burial mound
- SM1629 Coupar Angus, Abbey gatehouse
- SM5772 Coupar Angus Abbey, abbey precinct

Area 5

- SM7162 Nether Gothens, enclosure S of
- SM7167 Carsie Mains, pit-circle & mortuary enclosure 400m NNE of
- SM7169 Upper Gothens, enclosure 350m ESE of
- SM7189 Burnbank, barrows, enclosures & unenclosed settlement SW of
- SM7168 Broadmyre, pit-enclosure 130m SSW of
- SM1602 The Cleaven Dyke, cursus & bank barrow
- SM7282 Herald Hill, long barrow 700m NE of Hallhole
- SM7155 Hallhole, ring-ditch 600m NNE of
- SM7023 Hallhole, enclosures and trackways NNE of
- SM6952 Coin Hill, unenclosed settlement W of Hallhole
- SM6933 Hallhole, square barrow and pit alignment 600m E of
- SM6949 Hallhole, barrow 600m ESE of
- SM4233 Black Hill, Roman signal station
- SM7302 Stormont Loch, crannog

This is not a definitive list. Further assets that may have visibility of the proposals, based on a ZTV projection, or where the proposals may appear in key views towards them, should also be included in future assessments.

Category A-listed Buildings and Inventory Garden and Designed Landscapes

There is potential for setting impacts to multiple category A-listed buildings and inventory garden and designed landscapes for Area 3 and Area 5. These include:

- Hallyburton House (LB51605)
- Marlee House (LB13742)
- Meikleour (GDL00279)
- Keithick House (LB6170)

However, this is not necessarily an exhaustive list. A ZTV and initial setting assessment will be required to identify any others (beyond a 1km radius) that could potentially be impacted by the proposals for both Areas 3 and 5.

Whilst it is not possible to confirm at this stage, the submitted information suggests Area 3 is likely to be less impactful for category A-listed buildings and inventory gardens and designed landscapes.

Information on any management plans for existing screening should be considered as part of future, more detailed submissions. This will help clarify whether the screening and vegetation referred to can be considered viable mitigation for potential setting impacts to, for example, Keithick House (LB6170).

20 May 2026
Historic Environment Scotland

Dear Sarah,

RE our ref 105296 – Pre- application Development enquiry- SSEN – Coupar Angus Sub-Station.

Thank you for your advice request regarding the siting of the proposed sub-station.

We have read all the information that you have already collated for this proposal and have outlined below in the table the areas that we feel will have likely significant effect on the River Tay Special Protection Area (SPA) and Hare Myre, Monk Myre and Stormont Loch Site of Scientific Interest (SSSI) protected sites and features.

We recommend following the links to the attached guidance in the areas highlighted below.

Site location	Protected area	Protected interests (interests where a potential for impact exists listed only)	NatureScot advice at pre-application stage
Areas 3 & 5			Within potential connectivity distance of foraging geese. The agricultural landuse around Coupar Angus does offer foraging opportunities but there are extensive foraging opportunities in this area and the work will impact on relatively few fields over a short duration. Although any power lines may have longer-term impacts Might be worth considering bird line – markers hung from the overhead lines as a counter measure for geese having to forage in alternative locations as result of the proposed sub-station development. See NatureScot guidance on bird impacts on powerlines.

Areas 3 & 5	River Tay SAC	• * Atlantic salmon • * Brook lamprey • * River lamprey • * Sea lamprey • * Otter	To protect the SAC interests good working practices are essential. CEMPs, GEMPs, pollution plans etc. will all need to include details of working in proximity to the River Tay SAC (inc River Isla and Lunan Burn as part of the Tay SAC). We recommend that site specific plans for each location, detailing all aspects of construction and the mitigation needed to avoid adverse effects are produced and submitted in support of the application. Please refer to the NatureScot Guidance for the River Tay SAC Although not listed as a feature on the River Tay SAC, Freshwater Pearl Mussel's , as a protected Species, are connected to the River Isla so surveys will be required if there is likely to be an impact on the river catchment. Please refer to the NatureScot guidance on Freshwater Pearl Mussels and licencing.
Area 5	Hare Myre, Monk Myre and Stormont Loch SSSI	- Greylag goose (Anser anser), non-breeding - Open water transition fen - Vascular plant assemblage - Quaternary of Scotland	Within potential connectivity distance of foraging over wintering Greylag geese. Loss of foraging fields and pasture depending on the final location of the sub station.

			Pollution prevention plans will be essential to protect the open water transition fen and rare vascular plant assemblage which are susceptible to changes in nutrients of the water catchment and groundwater springs which feed the lochs. Although not recorded as a feature of the SSSI's, there are known beaver and Otter in the area and they are using the watercourses. We recommend following NatureScot's Standing advice for planning consultations - Beavers and Otters
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If you have further questions please feel free to get back in touch.

Kind regards

Cairnie

Cairnie Le Cornu Rickard / Operations Officer – Central Highland

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1. Appendix 1: SEPA energy generation and transmission information requirements

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 or particular location within a site. If there is a significant length of time between scoping and application submission, the developer should check whether our advice has changed.

1. Site layout

- 1.1 Each of the drawings requested below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, landraising and other groundworks, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other construction and built elements. All drawings must be based on an adequate scale with which to assess the information. This may mean that to show sufficient detail of smaller areas of the site, for peat depth, watercourse buffers and GWDTE in particular, as well as an overall whole site figure, multiple figures are required splitting the site into sections using larger scale maps. Such figures should show greater detail of where different elements of the proposed development are located in relation to those interests, to demonstrate how adverse effects have been minimised through the siting and design process.
- 1.2 We highlight that required buffers should be based on the outer extent of any proposed microsites and these should be clearly shown on the submitted drawings. The planning submission should also include a commitment that no microsites would take place that would result in infrastructure (excluding floating tracks) having a greater overall impact on peat, watercourses or GWDTE than the original location shown in the planning submission.



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- 1.3 The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable, cabling must be laid in ground already disturbed such as verges, and existing built infrastructure must be re-used or upgraded where possible.
- 1.4 A comparison of the environmental effects of alternative locations of infrastructure elements may be required. We seek absolute avoidance of development on the sensitive habitats detailed below. Where elements of a development have not avoided for example near-natural peatland, adequate justification should be provided for the proposed layout. The justification should include how any impacts are considered in relation to example the mitigation hierarchy as demonstrated through the Peat Management Plan (PMP) submission. This should be supported by drawings with overlays of the peat maps and any other constraints, such as visual impact, to clearly demonstrate how these constraints have influenced any necessary need for development on peatland and other sensitive habitats within our remit.
- 2. Peatland and other carbon rich soils**
- 2.1 Peatland in near natural condition generally experiences low greenhouse gas emissions, is accumulating and may be sequestering carbon, has high value for supporting biodiversity, helps to protect water quality and contributes to natural flood management, irrespective of whether that peatland is designated for nature conservation purposes or not. Where proposals are on peatland or other carbon rich soils, the following should be submitted to address our requirements in relation to NPF4 policy 5 to protect carbon rich soils and the ecosystem services they provide (including water and carbon storage).
- 2.2 It should be clearly demonstrated that detailed site-specific assessment has informed the layout and design of the proposed development in accordance with the

mitigation hierarchy in NPF4, to achieve the following in relation to peat and carbon rich soils:

- avoidance of near-natural peatland and of peat greater than 1 metre depth, and
- avoidance of other carbon rich soils where there are alternative areas of the site where carbon rich soils are absent, and
- minimisation of the absolute volume of peat material excavated and disturbed during construction, operational life and in decommissioning.

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

- a) Peat depth survey showing peat probe locations, colour coded using distinct colours for each depth category. This must include adequate peat probing information to inform the site layout in accordance with the mitigation hierarchy in NPF4, which may be more than that outlined in the [Peatland Survey – Guidance on Developments on Peatland \(2017\)](#).
- b) Peat depth survey showing interpolated peat depths.
- c) Peatland condition mapping – the [Peatland Condition Assessment](#) photographic guide lists the criteria for each condition category and illustrates how to identify each condition category.

2.4 The detailed series of layout drawings above should clearly demonstrate that peat excavation has been avoided where possible. Where complete avoidance of peat and other carbon rich soils is not possible, justification should be provided to

adequately demonstrate why this is the case, and it should be clearly demonstrated on the drawings that:

- a) Development proposals avoid any near natural peatland and the deepest areas of peat.
- b) All proposed excavation is on peat less than 1m deep, where feasible.
- c) The volumes of peat excavated have been reduced as much as possible, first through layout and then by design, making use of non-intrusive building and infrastructure design to minimise the impacts, for example the use of floating tracks.

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

- a) A table setting out the volumes of acrotelmic, catotelmic and amorphous peat to be excavated. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes.
- b) A table clearly setting out the volumes of acrotelmic, catotelmic and amorphous excavated peat: (1) used in making good site specific areas disturbed by development, including any borrow pits, (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) Suitable evidence must be provided to demonstrate that any reuse of excavated material in making good areas disturbed by development, including any borrow pits, is a suitable material for the intended reuse, the minimum necessary to achieve the intended environmental benefit and not a waste disposal operation. (For example, for reinstating ground and vegetation on track verges/shoulders we would typically expect peat reuse depths of up to 0.5m, with justification required for greater depths.) As well as information on the quantities, information

should be included on the suitability of the material for the intended reuse, what the intended environmental benefit is, how it would be achieved and how it relates to the surrounding habitat.

- d) 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.
- e) If peat is to be used in the reinstatement of borrow pits on site, cross sections and plans should also be provided showing the proposed maximum peat depth profiles for each category of peat, phasing and final restoration profiles in relation to surrounding land with a clear hydrological justification for the use of catotelmic peat also being given. The intended final target restoration habitat for each borrow pit should be specified, along with monitoring proposals and any required safety or other management measures. Details of how this will be maintained and managed in perpetuity should be included in the aftercare scheme.
- f) Use of excavated peat in areas not disturbed by the development itself is no longer a matter we provide planning advice on. Please refer to [Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot](#) 2023, and the [Peatland ACTION – Technical Compendium](#), which provides more detailed advice on peatland restoration techniques. Unless the excavated peat is certain to be used for construction purposes in its natural state on the site from where it is excavated, it will be subject to regulatory control. The use of excavated peat off-site, including for peatland restoration, will require the appropriate level of environmental authorisation. Excavated peat will be waste if it is discarded, or the holder intends to or is required to discard it. These proposals should be clearly outlined so that we can identify any regulatory implications of the proposed activities. This will allow the developer and their contractors to tailor their planning and designs to accommodate any regulatory requirements. Further guidance on this can be found in the document [Is it waste - Understanding the definition of waste.](#)

3. Water environment

- 3.1 Policy 11 of NPF4 requires that the project design and mitigation demonstrate how impacts on hydrology, the water environment and flood risk are addressed. The proposals should demonstrate how impacts on local hydrology have been minimised and the site layout designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors.
- 3.2 The submission must include a set of drawings showing:
- a) The footprint of all proposed temporary and permanent infrastructure (including all the ancillary construction work areas, for example excavations, landraising and other groundworks, storage, laydown and working areas) overlain with all waterbodies.
 - b) The minimum buffer around each waterbody, as detailed in Table 1 of [Recommended riparian corridor layer for use in land use planning document](#), from all construction activities including working and storage areas, or 50m where subsurface activities are more than 1m in depth. If these minimum buffers cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the waterbody, drawings of what is proposed in terms of any engineering works, and details of why the minimum buffer cannot be achieved and mitigation measures to protect the feature.
 - c) A map showing the location, size, depths and dimensions of all borrow pits overlain with all waterbodies within 250m and showing a site-specific buffer around each waterbody proportionate to the depth of excavations. The information provided needs to demonstrate that a site-specific proportionate buffer can be achieved.

- 3.3 Further advice and our best practice guidance are available on our beta.sepa.scot/regulation/authorisations-and-compliance/easr-authorisations/water-activities/engineering/ webpage. Guidance on the design of water crossings can be found in the [Construction of river crossings good practice guide](#).
- 4. Groundwater Dependent Terrestrial Ecosystems (GWDTE)**
- 4.1 The construction and operation of developments can disrupt groundwater flow and have adverse impacts on GWDTE, which are protected under the Water Framework Directive. The layout and design of the development must avoid adverse impacts on such areas, ensuring the water environment, including GWDTE, are protected.
- 4.2 As detailed in our [Guidance on assessing the impacts of developments on groundwater dependent terrestrial ecosystems](#), a phased approach to the assessment of risks to GWDTE is recommended, with greater detail being required for higher risk sites or activities.
- 4.3 Where monitoring is required, please note that baseline monitoring is expected to commence at least 12 months ahead of the development works starting on site and this should be factored into the timescales for submitting the planning submission and commencement of development.
- 4.4 A Phase 1 habitat survey should be provided unless the developer is already aware that GWDTE are likely to be present. Where initial assessment results indicate relevant habitats may be present, a National Vegetation Classification (NVC) survey should be submitted, along with the following information:
- a) A set of drawings demonstrating all GWDTE are outwith a 10m radius of all activities, 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m. The survey needs to extend beyond the site boundary where the distances require it, and the buffers based on the outer extent of any proposed micro-siting.

- b) If the minimum buffers cannot be achieved, a conceptual site model (CSM) should be provided that includes interpretation of the hydrogeological setting, including the groundwater flow regime, and the ecological features present. This may be supported, as appropriate, by intrusive ground investigation, groundwater monitoring, or groundwater modelling in addition to topography, properties of the emergent water and the soil, and underlying geology. Please refer to [Guidance on assessing the impacts of developments on groundwater dependent terrestrial ecosystems](#) for further advice on undertaking detailed site specific qualitative and/or quantitative risk assessments and the minimum information we require to be submitted.
- c) Please note that while we will accept The UK Habitat Classification System (UKHab) as an alternative to a Phase 1 habitat survey, due to discrepancies in habitat definition and ambiguity in correspondence with NVC types, we do not accept the use of the UKHab as an alternative to NVC.

5. Existing water abstractions

- 5.1 SEPA expect developments and infrastructure to be designed and constructed such that the water environment, including existing water abstractions, are protected. The applicant should seek to avoid adverse impacts on existing water abstractions through the detailed design of the development and by implementing best practice construction techniques.
- 5.2 Where monitoring is required, please note that baseline monitoring is expected to commence at least 12 months ahead of the development works starting on site and this should be factored into the timescales for submitting the planning submission and commencement of development.
- 5.3 The source (rather than the property it supplies) of both public and private water supply abstractions should be identified. The survey needs to extend beyond the site boundary where the distances require it (see point 5.5 a) below), and the

buffers should be based on the outer extent of any proposed micro-siting. Scottish Water holds information regarding public water supplies, and the Local Authority holds records of private water supplies. Note that the information held by the Local Authority will sometimes relate to the property served by the private water supply, rather than the location and details of the source itself (e.g. the house rather than the borehole or spring). Therefore, the location and details of each private water supply source require confirmation, including a site walkover survey.

- 5.4 As detailed in our [Guidance on assessing the impacts of developments on groundwater abstractions](#), a phased approach to the assessment of risks to groundwater abstractions is recommended, with greater detail being required for higher risk sites or activities.
- 5.5 The following information should be submitted where the assessment results indicate groundwater abstractions may be present:
- a) A set of drawings demonstrating the locations of the sources of all groundwater abstractions are outwith a 10m radius of all activities, 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m.
 - b) If the minimum buffers cannot be achieved a conceptual site model should be provided that includes interpretation of the hydrogeological setting, including the groundwater flow regime. This may be supported, as appropriate, by intrusive ground investigation, groundwater monitoring, or groundwater modelling. Please refer to [Guidance on assessing the impacts of developments on groundwater abstractions](#) for further advice on undertaking detailed site specific qualitative and/or quantitative risk assessments and the minimum information we require to be submitted.

- 5.6 Monitoring requirements for Scottish Water abstractions should also be agreed with Scottish Water along with any appropriate remedial actions to prevent negative construction/post construction impacts on water quality.
- 5.7 The Drinking Water Quality Regulator for Scotland (DWQR) ensures that drinking water in Scotland is safe, monitors water quality, and oversees compliance with regulations, through local Environmental Health Departments. As such, we defer to the advice of the Local Authority on the protection of surface water supplies. As per section 3.2.b above, we highlight that adequate buffers must be maintained between water bodies and development, and best practice pollution prevention measures are followed. Further best practice advice and our regulatory requirements can be found on our beta.sepa.scot/regulation/authorisations-and-compliance/easr-authorisations/water-activities/discharges/water-run-off/ webpage and section 9 below.

6. Flood risk

- 6.1 We reiterate that, as detailed above, our position and advice is based on the determining authority deciding that the proposed development is supported under NPF4 policy 22, unless we are advised otherwise.
- 6.2 Advice on flood risk is available at [Flood risk standing advice](#) and, although [EASR](#) has recently replaced CAR, reference should also be made to [Controlled Activities Regulations \(CAR\) Flood risk standing advice for engineering, discharge and impoundment activities](#).
- 6.3 Crossings must be designed to accommodate the 0.5% annual exceedance probability flows with an appropriate allowance for climate change, or information provided to justify smaller structures. Our [Climate change allowances for flood risk assessment in land use planning](#) guidance sets out required allowances for climate change.

- 6.4 In order to establish that the five bullet points within NPF4 policy 22.a have been satisfied and where it is considered the development could result in an increased risk of flooding to a nearby receptor, then a flood risk assessment (FRA) must be submitted. Our [Technical flood risk guidance for stakeholders](#) provides generic requirements for undertaking Flood Risk Assessments as well as our [Climate change allowances for flood risk assessment in land use planning](#) guidance.
- 6.5 The FRA should specifically address the following issues:
- a) All existing watercourses and drains on the site are fully identified and flow pathways understood in relation to the 1 in 200 year plus climate change flood levels for the catchment.
 - b) The modelling should extend far enough upstream to capture any flow pathways which may impact the development site.
 - c) Demonstration there is no increased flood risk to existing properties in the vicinity of the proposed development and, if possible, demonstrate an improvement.
 - d) Any intended realignment or alteration of channels should also be outlined and accounted for within the FRA, with analysis showing pre and post development flood risk.
 - e) Where applicable, flows should be shown to be accommodated within any altered channel to avoid flooding of existing structures, access roads or increased risk for others.
- 6.6 Generally, we are unable to support landraising within a flood risk area unless it is required for development outlined under the exceptions in policy 22.a of NPF4. It is for the determining authority to advise us whether they consider any of the policy exceptions apply. If they advise us that an exception or exceptions do apply and if landraising is proposed within the flood risk area identified within the FRA, it should

be linked to compensatory storage and demonstrated that there is no reduction in floodplain capacity or increased risk for others, and that the compensatory storage can be maintained in perpetuity. Notwithstanding this, any landraising must be minimised as far as possible.

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

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), along with our beta.sepa.scot/regulation/authorisations-and-compliance/easr-authorisations/water-activities/discharges/water-run-off/ and [Water activities | Beta | SEPA | Scottish Environment Protection Agency](#) webpages, for more information and advice.
- 7.2 A commitment must also be included in the schedule of mitigation that micro-siting will not encroach into sensitive areas, to avoid adversely affecting mitigation measures identified in the planning submission that seek to avoid and/or minimise adverse effects on sensitive receptors (eg peat, watercourse and GWDTE buffers).
- ## **8. Life extension, repowering and decommissioning**
- 8.1 The discarding of materials as waste should be avoided and the [waste hierarchy](#) applied to waste produced during construction, operation and decommissioning of the development. If there is an intention to discard materials then further guidance on this can be found in [Is it waste - Understanding the definition of waste](#), and our beta.sepa.scot/regulation/authorisations-and-compliance/easr-authorisations/waste-activities/ webpage.

- 8.2 We also highlight that confirmation of the end re-use/disposal of any materials resulting from the removal of temporary infrastructure at the end of the construction phase, for example aggregate from temporary access tracks, should be provided so that we can advise the applicant on the relevant waste implications and authorisations. We have specific [guidance](#) on the reuse of Type 1 aggregate that should be referred to.

9. Other planning matters

- 9.1 For all other planning matters, we refer you and the developer to the relevant standing advice in our [Development management thresholds and standing advice](#) document, which is also applicable to Electricity Act applications.

10. SEPA authorisation

- 10.1 We authorise several matters relating to water, waste management, radioactive substances, and pollution prevention and control. Since 1 November 2025, all water, waste management and industrial activities are regulated under the Environmental Authorisation (Scotland) Regulations 2018 (EASR), as amended. Our beta.sepa.scot/regulation/ webpage provides good practice advice and guidance and defines those activities which may require authorisation by SEPA, along with details of how to contact us for more help, advice and how to apply for any necessary authorisations.
- 10.2 It is an applicant's responsibility to ensure their proposals will meet all relevant regulatory requirements and they are working within regulatory guidelines. We prefer all the technical information required for any SEPA authorisations to be submitted at the same time as the planning or similar application. We consider it to be at the applicant's commercial risk if planning permission is granted for a development/process which cannot gain authorisation from us, or if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising.

