Scottish & Southern Electricity Networks

TRANSMISSION

Pre-Application Consultation and Engagement Strategy

For submission to ECU

LT000622 Northern Shetland 220kV to Kergord 132kV, Shetland

October 2025

Scottish & Southern Electricity Networks
TRANSMISSION

CONTENTS

1.	**INTRODUCTION AND BACKGROUND**	**2**
1.2	About the Project	2
1.3	EIA Development Status	3
1.4	PAC Notice	4
1.5	Links to further information	4
1.6	SSEN Contact Details	4
1.7	Technical experts	4
1.8	Recording of Comments	5
2.	**STAGE 1: DEFINITION OF THE PROPOSED ROUTE**	**6**
2.1	What will be consulted upon in Stage 1	6
2.2	Information to be made available on the project website	6
2.3	PAC Event 1	6
2.4	Publicity	6
2.5	Online consultation	6
2.6	Feedback period for comments	7
2.7	Report on Consultation	7
2.8	Specific feedback sought	7
3.	**STAGE 2: DEFINITION OF THE ALIGNMENT**	**8**
3.1	What will be consulted upon in Stage 2	8
3.2	Information to be made available on the project website	8
3.3	PAC Event 2 / Duplicate events	8
3.4	PAC Event 3 / Duplicate events	8
3.5	Publicity	8
3.6	Online consultation	8
3.7	Report on Consultation	8
3.8	Feedback period for comments	8
4.	**CONCLUSIONS AND NEXT STEPS**	**9**
4.1	PAC Strategy Approval and Future Amendments	9
4.2	PAC Report	9
5.	**APPENDICES**	**10**

Appendix 1: Proposal of Application Notice

Appendix 2: Route Options Map appended to Proposal of Application Notice

Appendix 3: Draft Shetland times Advert PAC1

1. INTRODUCTION AND BACKGROUND

1.1.1 Scottish Hydro Electric Transmission plc (the 'prospective Applicant'), operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission), owns, operates and develops the high voltage electricity transmission system in the north of Scotland and remote islands. SSEN Transmission holds a license under the Electricity Act 1989 to develop and maintain an efficient, co-ordinated and economical system of electricity transmission.

1.1.2 The prospective Applicant intends to seek consent under Section 37 of the Electricity Act 1989 (as amended) to install and keep installed a 220kV double circuit on a steel lattice towers and up to 4 x 132kV circuits on steel trident H poles or up to 3 x 132kV circuits on two lattice towers between Kergord and the Scatsta area on the Shetland Mainland.

1.1.3 In May 2025, the Energy Consents Unit (ECU) published 'Electricity Act 1989 pre-application consultation and engagement guidance for electricity transmission line projects which require Environmental Impact Assessment' (S37 PAC Guidance).[1] This document recommends how ECU would like Transmission Operators to undertake PAC, and in section 3 (page 9), it describes the drafting and submission of a PAC Strategy in alignment with this guidance.

1.2 About the Project

1.2.1 Originally, LT216 Kergord to Yell was intended to provide 2 wind farms on Yell with a connection to the 1st Shetland HVDC link, via a new switching station on the Island of Yell then onwards connection to the existing HVDC converter station site at Upper Kergord.

1.2.2 Due to projected increases in demand and generation in Shetland, and the inclusion of a 2nd 1800MW HVDC link between Shetland and Mainland Scotland in NESO's Beyond 2030 Report, it was identified that a more strategic approach to the on-island transmission infrastructure on Shetland was required. This resulted in the Shetland Strategy being formulated in early 2025, identifying a solution which would meet the requirements of contracted customers on Shetland, as well as future projected load increases.

1.2.3 The Strategy identifies the need to provide a connection from Yell to the Shetland mainland, to meet existing customer connection requirements and Clean Power 2030 commitments; and to create a Shetland mainland transmission corridor from a substation in the north of the Shetland mainland (near Scatsta airport / Sullom Voe Oil and Gas terminal) to accommodate the connection from Yell, nearby demand, ScotWind and the 2nd HVDC link) to the existing Kergord 132kV substation (located centrally on the Shetland mainland where the first HVDC link and Gremista Grid Supply Point (GSP) currently connects).

1.2.4 The LT000622 project will expand the existing Shetland system and develop a 220kV on-island transmission network for the connection of on-island onshore wind, flexible hydrogen demand, and offshore wind (associated with Crown Estate Scotland's ScotWind seabed leasing process in 2022), as well as other credible energy scenarios that could contribute towards meeting net zero targets. This 220kV on-island transmission network will also interconnect the existing 600MW HVDC link (from Kergord) to the 2nd HVDC link (limited to a capacity of 1800MW) connecting from Shetland to the GB mainland (likely to landfall and connect in Aberdeenshire) as recommended by the NESO in the Beyond 2030 Report.

1.2.5 To inform the future development of Shetland's on-island transmission infrastructure, SSEN Transmission, in collaboration with SSEN Distribution, Shetland Islands Council, the NSTA, ScotWind developers, and other key stakeholders, undertook a detailed optioneering process. This work as carried out in line with our Area System Planning (ASP) methodology and followed a comprehensive programme of key stakeholder engagement to

[1] See Electricity Act 1989 pre-application consultation and engagement guidance for electricity transmission line projects which require Environmental Impact Assessment (May 2025)

understand the likely future demands on the island. The options assessment focused on comparing a 132kV transmission strategy with a more expandable 220kV alternative. While the 132kV option offered a lower up-front cost, the 220kV solution was identified as the most economic and efficient in the long term. It provides greater capacity and flexibility to support all credible energy scenarios out to 2045, in line with Scotland's net zero targets, and allows for a more streamlined network design, helping to limit the environmental and community impact of new infrastructure.

1.2.6 The proposed 220kV strategy includes: Two 220kV circuits, comprising both overhead line and underground cable (where applicable), connecting the proposed Northern Substation to a proposed central Shetland 220kV substation, and from this substation to the existing Kergord infrastructure.

1.2.7 This approach sets the foundation for a robust, future transmission network that can respond to Shetland's evolving energy landscape while managing cost, deliverability, and stakeholder impact.

1.2.8 The proposed Northern Shetland 220kV to Kergord 132kV transmission infrastructure would potentially comprise:

- A 220kV double circuit rated 460MVA per circuit on steel lattice towers, with an estimated length of 17.4km and up to 4 x 132kV circuits on steel trident towers, or up to 3 x 132kV circuits on two lattice towers of estimated length of 5.2 km between Northern Shetland substation and a central Shetland substation and Kergord. (Exact lengths to be confirmed following OHL routeing and alignment and necessary site selection on substations).

The LT000622 Kergord to Scatsta project would:

- Facilitate the interconnection of the two HVDC links (1st 600MW link and 2nd 1800MW link) to maximise available capacity on both HVDC systems.
- Provide a Shetland mainland transmission corridor from a substation in the north of the Shetland mainland (near Scatsta airport / Sullom Voe Oil and Gas terminal) – to accommodate the connection from Yell, nearby demand, ScotWind and the 2nd HVDC link) to the existing Kergord 132kV substation (located centrally on the Shetland mainland which connects to the first HVDC link and Gremista GSP).

1.2.9 A Notification of Project Establishment form was sent to the ECU on 17 September 2025.

1.3 EIA Development Status

1.3.1 Compliance with the ECU's S37 PAC Guidance is only required for proposals for EIA Development.

1.3.2 Developments falling within a description in Schedule 1 of the Electricity Works (Environmental Impact Assessment) Regulations 2017 will always require EIA. Schedule 1 specifies that the following will require EIA:

- the carrying out of development to provide a nuclear generating station or other nuclear reactors (except research installation for the production and conversion of fissionable and fertile materials, whose maximum power does not exceed 1 kilowatt continuous thermal load).
- the carrying out of development to provide a thermal generating station with a heat output of 300 megawatts or more.
- construction of overhead electrical power lines with a voltage of 220 kilovolts or more and a length of more than 15 kilometres.

This project will consist of the construction of overhead power lines with a voltage of 220kV and an estimated length of 17.4km, as well as the construction of overhead power lines with a voltage of 132kV and an estimated length of 5.2km. Therefore, it is a Schedule 1 development and automatically is determined to be EIA development.

1.4 PAC Notice

1.4.1 We have submitted a Proposal of Application Notice to the ECU and Shetland Islands Council, and this is attached as Appendix 1.

1.5 Links to further information

1.5.1 The project will be added to the SSEN Transmission projects website and relevant project information will be made publicly available on the dedicated web page as the project develops. Hyperlink below:

Northern Shetland 220kV to Kergord 132kV transmission infrastructure - SSEN Transmission

1.6 SSEN Contact Details

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1.7 Technical experts

1.7.1 The relevant contacts for the consenting stage of the project are:

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1.8 Recording of Comments

1.8.1 Any information or feedback given during the consultation process, through direct feedback, the use of consultation forms provided at PAC events or via virtual events or using online feedback forms, will be recorded in a comments register by the LT622 project team for the purposes of providing feedback and for use within the Pre- Application Consultation Report (PAC Report).

2. STAGE 1: DEFINITION OF THE PROPOSED ROUTE

2.1 What will be consulted upon in Stage 1?

2.1.1 During Stage 1, we intend to provide information on the requirement for the project, routeing constraints, technology options and issues that need to be taken into account in developing the proposed route.

2.1.2 We will seek specific feedback on all potential route options. This will include an initially proposed least constrained route along with other route options. We will seek views on the relevant local issues that will help to inform the decision making relating to the development of any proposed route following assessment of technical constraints and any feedback given.

2.2 Information to be made available on the project website.

2.2.1 The date of the Routing Event will be advertised in the project updates section of the SSEN Transmission projects website on the dedicated web page. Consultation materials will also be available there.

2.3 PAC Event 1/ Duplicate events

2.3.1 We intend to hold the PAC Event for Stage 1 at the following dates and locations.

Date	***Location***
27 November 2025	Voe Public Hall, Isles Road, Voe, Shetland, ZE2 9PT

2.3.2 The hours of the event will be [3-8 pm]. Given the relatively short length of the proposed routes, we do not currently envisage that duplicate events are required however we may review this position if feedback received indicates that further events are necessary.

2.3.3 Voe Hall is a popular community owned venue located centrally within the proposed project area and is accessible locally on foot via public footpath. The venue is well situated in relation to the main road network for access by cycle, car and public transport, and is served by a large level parking area with double door ramped access to the hall. The hall has a registered Changing Places Toilet (CPT) meeting the standards specified by the Changing Places Consortium (CPC) and has been registered on the Changing Places National Register.

2.4 Publicity

2.4.1 We will be advertising the event in the Shetland Times on 30 October 2025. The content of the advert is shown in appendix 2. We will also undertake a mail drop to properties along the route and will typically mail properties within a defined distance of our developments ahead of all of our events in any case. We will in addition, advertise on our social media channel and directly contact interested parties who have attended previous events that we have held outwith the formal PAC process. We will also directly contact anyone who has signed up for project updates on our website.

2.4.2 We will retain a copy of this advert and any other publicity materials to attach to the PAC Report.

2.5 Online consultation

2.5.1 A virtual version of the event will be accessible online via the project webpage from the date of the in-person event with information on how to submit comments electronically, by post and in person. Information on how feedback will be provided will also be included.

2.6 Feedback period for comments

2.6.1 Following the event(s), we confirm that the feedback period will be open for a minimum of 28 days. We will ascribe a longer period in respect of this event as the Christmas break falls within the 28 day period. We are advertising on the basis of 08 January 2026. Comments will be recorded at the event and those attending will be given the opportunity to take materials away and to comment in private via email or in writing. There will also be opportunity to comment via the dedicated project web page.

2.7 Report on Consultation

2.7.1 A report on consultation outlining the feedback from PAC 1 will be made available via the project website online in January/February 2026.

2.8 Specific feedback sought.

Feedback will be sought on any potential issues with all the route options including a proposed least constrained route. We will also seek views on proposed technology options. We will seek views on any relevant local issues that may not be included in accessible geographical and environmental information, or which may not be immediately apparent that will help to inform the decision making relating to the development of any final proposed route and technology option following assessment of technical constraints and any feedback given.

3. STAGE 2: DEFINITION OF THE ALIGNMENT

3.1 What will be consulted upon in Stage 2?

3.1.1 Event 2 will consult on detailed alignment considerations that will help inform the final alignment.

3.1.2 The event will seek specific feedback on the proposed alignment and the location of structures and construction arrangements.

3.1.3 Any alignment will be informed by EIA survey information and studies that will feed into the EIA Report that would accompany any application submitted to the ECU.

3.2 Information to be made available on the project website.

3.3 PAC Event 2 / Duplicate events

3.3.1 SSEN Transmission will assess the requirement for additional events following the Stage 1 Routeing event. The proposed route is comparatively short and is located within a relatively confined area within an island environment. The requirement to hold multiple events at each stage is currently not identified as necessary however this would be reconsidered If feedback to that the effect that additional events were required was received.

3.4 PAC Event 3 / Duplicate events

3.4.1 SSEN Transmission will undertake a third round of formal consultation in order to present the finalised proposal before a S37 application is made. This event will summarise the final proposals that are intended to form the section 37 application. Consultation Event 3 will provide feedback to the community on the SSEN Transmission response to earlier stages of consultation and engagement. At this event SSEN Transmission will set out the broad scope of the final proposals and advise how formal representations may be made post-application to Scottish Ministers. As above the requirement for duplicate events will be assessed throughout the consultation process.

3.5 Publicity

3.5.1 The events will be advertised in a similar manner to Event 1 once dates have been set. We are too far out from knowing our alignment to determine the precise date of events 2 and 3 but these are expected to take place in Q1 of 2026

3.6 Online consultation

3.6.1 A virtual event or events depending on the level of necessity to hold multiple events identified through Event 1 feedback will be accessible online via the project webpage from the date of event with information on how to submit comments electronically, by post and in person.

3.7 Report on Consultation

3.7.1 A report on consultation outlining the feedback from PAC 2 and 3 will be made available via the project website online with dates to be confirmed for this once the timescale for PAC 2 and 3 are established. This being in line with the suggestion in guidance that this is a live document to be updated as necessary through the consultation process.

3.8 Feedback period for comments

We confirm that the feedback period will be open for a minimum of 28 days for Event 2. Comments will be recorded at the event and those attending will be given the opportunity to take materials away and to comment in private via email or in writing. There will also be opportunity to comment via the dedicated project web page.

4. CONCLUSIONS AND NEXT STEPS

4.1 PAC Strategy Approval and Future Amendments

4.1.1 The S37 PAC Guidance explains that, following submission, ECU will review and approve the proposed PAC Strategy within three weeks, or, if any modifications are sought to the PAC Strategy to ensure compliance with this guidance by the ECU these will be communicated within 2 weeks following submission. We look forward to feedback from ECU in either case.

4.1.2 This PAC Strategy is intended to be a live document should amendments be required. Any subsequent amendments to the PAC Strategy will be agreed with the ECU case officer in writing. This document, once approved, and any future revised versions, will be published on the project website in due course.

4.2 PAC Report

4.2.1 Having conducted the PAC contained in this document, we also commit to submitting a PAC Report with any resulting application for S37 consent to reflect the contents prescribed on pages 19-20 of the S37 PAC Guidance.

5. APPENDICES

5.1.1 Appendix 1: Proposal of Application Notice

Appendix 2: Route Options Map appended to Proposal of Application Notice

Appendix 3: Draft Shetland times Advert PAC1