

Fiddes

400kV Substation

Report on Consultation

November 2023



Scottish & Southern
Electricity Networks

TRANSMISSION

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1. Introduction

1.1. Purpose of this document

The purpose of this Report on Consultation (RoC) is to document the site selection process, consultation, and feedback for a new proposed 400kV substation in the Fiddes area, Aberdeenshire, and to show how the option taken forward to the next stage has been informed by this process.

This RoC details the consultation undertaken, including consultation methods and advertising, those consulted and/or contributing to the process and it also summarises the feedback received, including objections, concerns, and areas of support. It confirms which Site option for the proposed new 400kV substation is being progressed to the next stage of development and provides information on the next steps we are implementing, leading to the next public consultation events.

1.2. Project Overview

Based on the requirements outlined in National Grid ESO's Pathway to 2030 Holistic Network Design we have developed proposals to reinforce the transmission system, as part of this we are proposing to establish a new 400kV overhead line (OHL) between Kintore and Tealing.

This requires two new 400kV substations to be constructed to connect to this new OHL, one near Fiddes and one near Tealing in Angus to enable required future connections and export routes to areas of demand. Together, these three projects form the East Coast 400kV Phase 2 Upgrade. While each is being progressed as a separate project, they are intrinsically linked and were presented as such in the combined consultation process launched in May of this year.

This RoC covers the proposed new 400kV Substation in the Fiddes area (referred to in the earlier consultation process as the Fiddes 400kV Substation).

Please refer to the following project webpages for Reports on Consultation for the proposed Kintore to Tealing 400kV OHL and proposed Tealing 400kV Substation:

- [Kintore to Tealing 400kV OHL](#)
- [Tealing 400kV Substation](#)

The new substation addressed in this Report will require the following:

- The construction of a new outdoor AIS 400kV substation, which would require an area of land approximately 650m x 300m.
- Space to accommodate connections from future renewable energy generation projects.
- Land for drainage, landscaping, habitat enhancement and access.



New SSEN Transmission projects between Kintore and Tealing

- Land would also be required on a temporary basis during construction for use as equipment storage, site offices and welfare facilities.

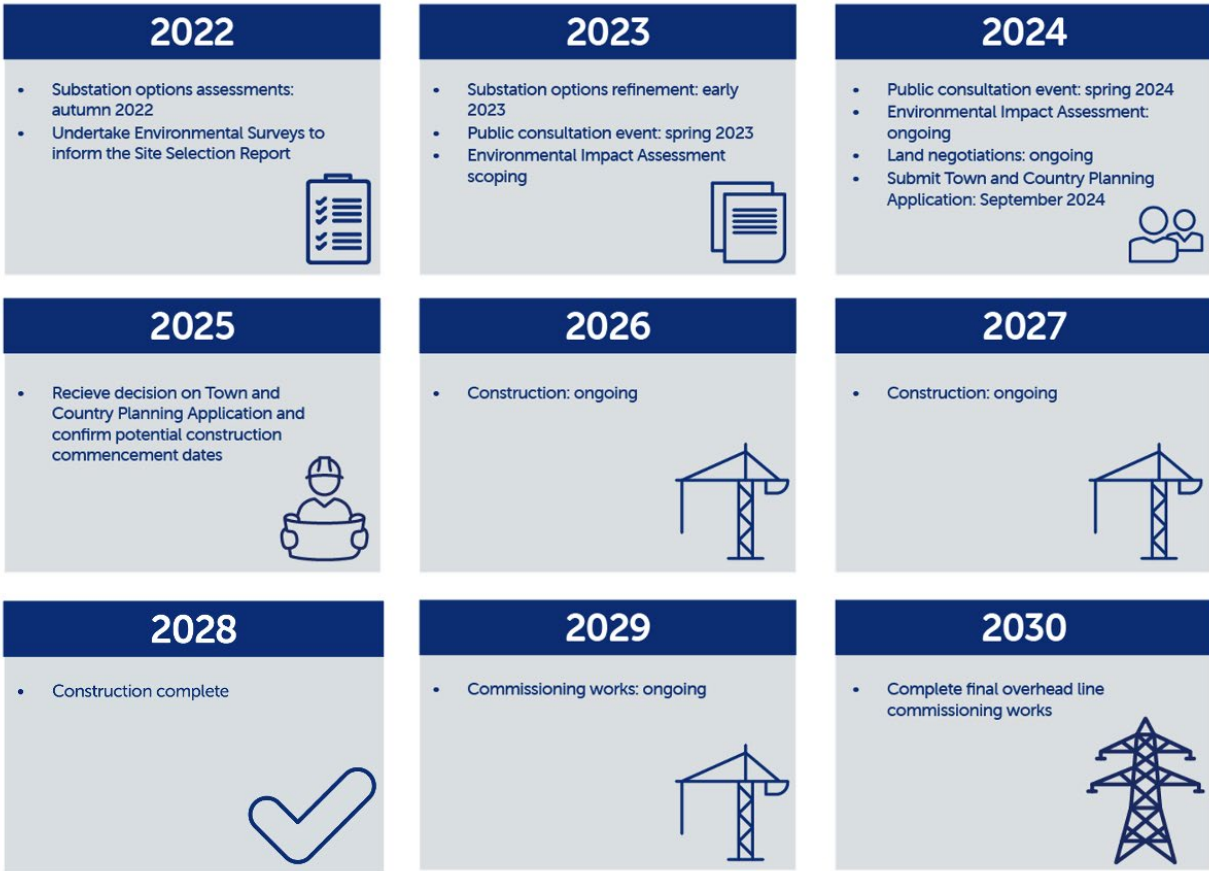
The following proposed new transmission infrastructure will require a connection to the new Substation:

- The proposed Kintore to Tealing 400kV OHL connection. This will comprise an OHL from the south, from Tealing and an OHL from the north, from Kintore.
- A new connection to the existing Fiddes 132kV Substation
- A new underground cable connection from an offshore wind developer.

The Consultation Document issued in May this year which introduced the preferred site option for the proposed new 400kV Substation at a location referred to as Site 5B also highlighted the need to provide a new offshore cable connection, referred to as the proposed Offshore Integrated Network. This introduced a requirement for the identification and selection of a much larger site, approximately 700m x 700m.

The technology choice and proposed locations of the Offshore Integrated Network is currently under review. As a consequence, the new 400kV Substation project is no longer considering the Offshore Integrated Link. This has enabled a reduction in substation footprint from the previous consultation. Once further clarity is available on the Offshore Integrated Network an update will be provided on any additional works required.

1.3. Project Timeline



1.4. What we were consulting on

We understand the importance of involving communities and key stakeholders throughout each stage of our development process. Stakeholder feedback collected during consultations is critical to ensuring that our decision making is informed, and stakeholder concerns are taken into consideration at each stage of the project’s development.

During this consultation, we presented options regarding our site selection for the proposed Fiddes 400kV Substation. The consultation included information regarding site options, environmental and technical considerations, and the project development process and explained the factors which were taken into consideration in the selection process. The consultation explained how Site options 5A, 5B and 8B were assessed in greater detail and that the outcome of the process identified Site 5B as the preferred site option to be taken forward into the consultation process.

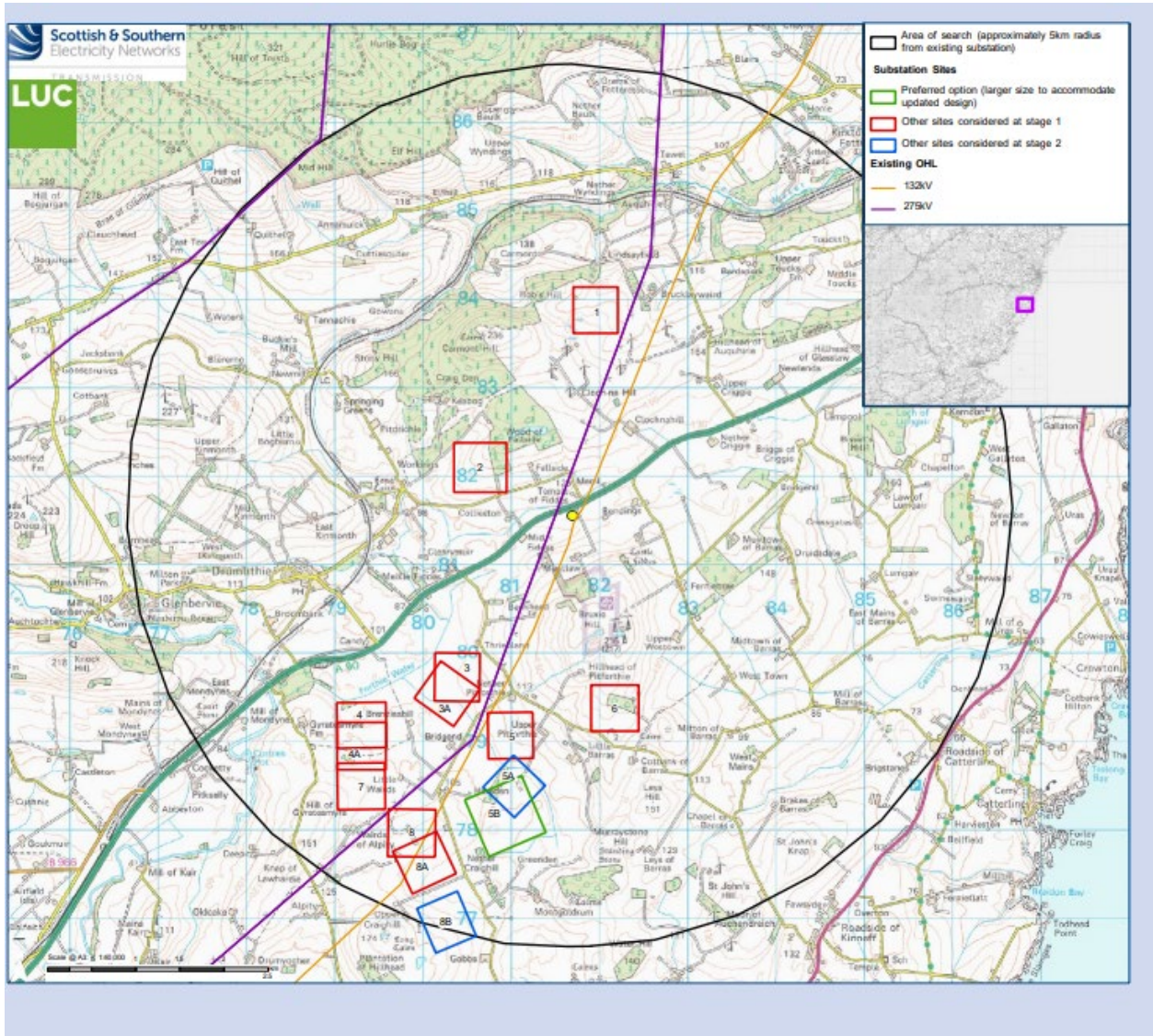


Figure 1.1 - Site Selection Options

2. The Consultation Process

2.1. Who we consulted with

Our consultation process sought to capture the views of anyone who had an interest in our proposals, and we invited comments from all interested parties. During our engagements we aimed to ensure that we captured the views of:

- statutory consultees
- non-statutory consultees
- community members and local organisations; including local elected members
- landowners and occupiers

2.2. Consultation feedback period

The public consultation period was open from 2 May 2023 and was initially expected to end on the 9 June, however it was extended to 23 June 2023 and further to 28 July 2023 due to requests from Stakeholders to allow more time to respond to the consultation.

Statutory consultees and non-statutory consultees were invited to provide feedback on our Consultation Documents¹. Where possible, affected landowners were contacted ahead of the consultation period opening to discuss land related considerations or concerns.

2.3. The advertising process

The consultation events were advertised using the following methods:

- The Angus County Press, The Courier and The Press and Journal.
- Our social media channels and the dedicated project webpage.
- Community Councillors and Local Elected Members were emailed in advance with information they could share within their local area.
- Postcards were sent to 11,276 homes and businesses within communities potentially impacted by our proposals (please refer to Appendix 2).

¹ Available on the Fiddes 400kV Substation project website: <https://www.ssen-transmission.co.uk/projects/project-map/fiddes-400kv-substation/>.

2.4. Stakeholder participation

A series of in-person consultation events were held between 2 May and 13 July 2023 where local stakeholders had the opportunity to meet with the project team to discuss the proposals in more detail.

Date	Event	Recorded attendance
2 May 2023	Kirkton of Skene – Milne Hall	67
3 May 2023	Ardoe – Ardoe House Hotel	40
4 May 2023	Laurencekirk – Dickson Hall	169
9 May 2023	Brechin – Brechin City Hall	133
10 May 2023	Kirriemuir – Westmuir Hall	54
11 May 2023	Tealing – Tealing Village Hall	75
13 July 2023	Forfar – Reid Hall	101

Attendance figures reflect the number of people who had registered attendance at a consultation event. For busier events, the number of attendees can often be considerably higher than recorded.

For members of the public who were unable to attend the face-to-face consultation events, a virtual consultation event was held on 17 May 2023 between 4pm and 6pm.

The virtual consultation event was held via a virtual consultation room which provided information boards giving an overview of the project and the type of infrastructure proposed. During the virtual consultation event, a live chat function was available for members of the public to ask questions about the project.

The event was attended by 75 people and the exhibition within the virtual room has remained open and is available via the project website: <https://3dwebtech.co.uk/dashboard/ssen/tealing-to-fiddes/exhibition-en/>

Stakeholder meetings

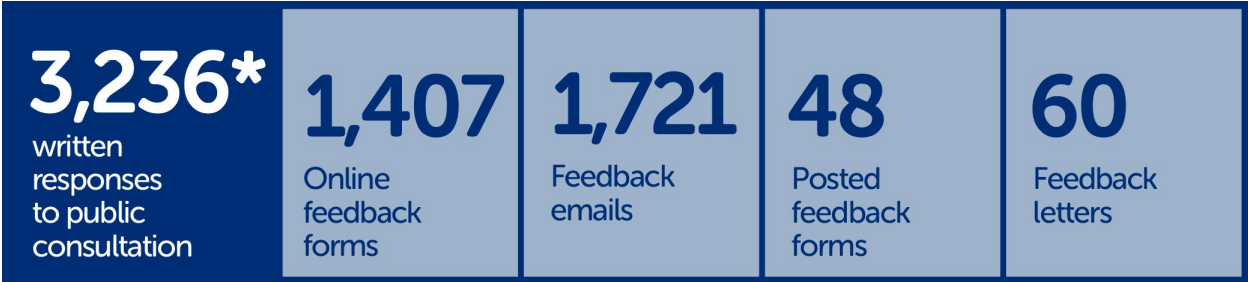
In the weeks before, during and after the consultation events, various meetings were held with other key stakeholders such as landowners, statutory and non-statutory consultees and councillors to discuss the project proposals.

Date	Meeting Type	Stakeholder group in attendance
19 April 2023	Pre-Consultation Microsoft Teams Meeting for Local Ward Councillors	Local Ward Councillors, 39 invited and 7 attended
25 April 2023	Pre-consultation webinar for Community Councils	Local Community Councils, 27 invited, 2 attended
13 June 2023	Community Council requested in person public meeting.	Arbuthnott Community Council and community members.
14 June 2023	Community Council requested in person public meeting.	Crathes, Drumoak and Durriss Community Council and community members.
19 June 2023	Community Council requested in person public meeting.	Glamis and Area Community Council and community members
18 July 2023	Community Council requested in person public meeting.	Culter Community Council and community members.

2.5. Feedback volume

Feedback from our stakeholders was welcomed via a range of methods. For the public consultation, only responses in the form of letters, emails, phone calls or the feedback form submitted by post or email, or online, before the feedback period end date, have been included in the analysis undertaken for this Report. Feedback received after the end date has been responded to and considered by the project team but has not formed part of the analysis presented in this Report.

Responses to public consultation



Respondents generally provided feedback on the project scheme; Tealing to Kintore OHL, Tealing Substation and Fiddes Substation therefore the decision was made to present the feedback as one scheme.

Responses from statutory and non-statutory consultees:

The Consultation Documents regarding the three projects within the East Coast 400kV Upgrade Project was issued to a total of 43 statutory consultees and 34 non-statutory consultees, inviting feedback on the preferences presented. A total of 8² and 5² responses were received, respectively, specifically in connection with the proposed Fiddes 400kV Substation proposals. A summary of the responses and our responses are presented in Tables 3.3-3.5 below and in more detail in Appendix 1.

Stakeholder representations

A number of other non-statutory organisations that were not directly approached by us, have responded to the consultation through the public consultation channels. All their comments have been taken on board and were analysed for this Report along with the public consultation responses.

² Some responses were to the consultation overall which included the proposed Tealing and Fiddes 400 kV Substations and the Kintore to Tealing 400kV OHL projects. The responses specifically responding to Fiddes Substation are counted here.

3. Consultation Feedback and Our Response

3.1. Common Themes

Across all of our Pathway to 2030 project consultations, we received feedback covering a number of common themes. Although some of this feedback related to topics which fell outside of the scope of our consultations, we recognise that it is important to address the points that our stakeholders took the time to raise, which we have summarised in this section. In addition, we have also developed a set of Frequently Asked Questions (FAQ) that can be viewed [here](#).

Project Need

The need for these projects has been independently assessed by both the GB Electricity System Operator, National Grid ESO (ESO); and the GB energy regulator, Ofgem.

Some responses questioned whether these projects are needed at all. In many cases, those questioning the need have done so as the electricity these projects will connect, and transport is not all needed in the north of Scotland.

Under our licence, we have a legal obligation to provide connections to electricity generators looking to connect to our network and we do not determine the location of new electricity generation. This is led by generators themselves, often underpinned by Government targets and policies.]

These projects - which are part of a major upgrade of the electricity transmission network across Great Britain - are needed to unlock the north of Scotland's vast renewable electricity resources and transport that power to demand centres across the UK.

The renewable electricity these projects will transport will play a key role in meeting UK and Scottish Government renewable energy and climate change targets. They will also help secure the country's future energy independence by reducing dependence on imported power from volatile wholesale energy markets.

For more details on why these projects are needed and how this need has been assessed, we have published [a short briefing paper](#).

Technology Choice

Several respondents have questioned the technology choice, particularly why the infrastructure cannot all be installed subsea or underground, instead of overhead line steel lattice towers.

Due to the significant volume of power we need to connect and transport from generation source to areas of demand the ESO concluded that there is a need for both onshore and offshore network reinforcements.

The ESO's and Ofgem's independent assessment of need for this project and our wider Pathway to 2030 programme was also based on the technology choices we are progressing.

Underground cabling is highly sensitive to ground conditions and terrain. There can be significant and lasting environmental impacts and future land use constraints associated with undergrounding; together with the technical challenges of operating, maintaining and in the event of a fault, restoring power.

Cost is also an important consideration, with subsea and undergrounding significantly more expensive than overhead. As the cost of investing in the electricity transmission network is ultimately recovered by electricity bill payers across GB, cost is one of the key factors in the ESO's and Ofgem's assessment of need, and in Ofgem's future assessment of the costs we are allowed to recover for these projects.

Environmental impacts

We have received feedback highlighting concerns about potential environmental impacts, particularly on local biodiversity.

As one of the greatest risks to our natural environment and biodiversity is climate change, these projects are part of the solution if we are to tackle the climate emergency and deliver net zero emissions in Scotland and across the United Kingdom.

However, we do recognise that in delivering these critical projects, there will be unavoidable impacts and we would like to reassure stakeholders that we take our environmental responsibilities extremely seriously.

To deliver our projects in the most sensitive way possible we ensure environmental factors are considered at every stage in the development of each project, along with technical requirements and economic considerations. A key way we do this for the environment is to follow the mitigation hierarchy. Firstly, we seek to avoid sensitive areas wherever possible and where impacts are likely to occur we seek to minimise these, provide mitigation and identify opportunities to restore.

In addition, all of our consent applications will be accompanied by detailed environmental assessments which are prepared by external specialists. These assessments will consider impacts on a wide range of environmental topics (many of which have been highlighted in the stakeholder responses to this consultation) and identify measures that may be required to mitigate any impacts.

We also acknowledge that minimising impacts is not enough on its own, and we have therefore committed to delivering a Biodiversity Net Gain (BNG) on all our projects; as well as compensatory planting for any trees felled during the construction phase, where possible with native species. Where our projects are unable to completely avoid irreplaceable habitats (for example peatland or ancient woodland), we have also introduced a commitment to restore more habitat than we affect.

You can find out more about how we are delivering a positive environmental legacy by [clicking here](#).

In the following section of this Report on Consultation, we will address any specific environmental feedback relevant to the options we consulted on.

Socio-Economic impact

Several community responses highlighted concerns about the impact on the local community, including visual and tourism impacts. We have also been asked what local benefits these projects will provide.

We acknowledge that there will inevitably be a visual impact on some local communities and are committed to do all that we can to minimise and mitigate this as part of the ongoing development of this project. The environmental assessment that will accompany our consent applications will also consider landscape and visual impacts.

From a tourism perspective, as part of our consent application, we intend to consider socio-economic and tourism impacts as part of the suite of documentation to be submitted to relevant consenting authorities. This will ensure that appropriate consideration is given to these issues in the consenting process.

These projects will also provide significant benefits to local and national economies. Independent socio-economic analysis undertaken on our Pathway to 2030 projects has estimated that they will collectively support around 20,000 jobs across the UK, around 9,000 of which are expected in Scotland, [adding billions of economic value](#) to the economy.

We also expect these projects to deliver significant local benefits, including direct and indirect job opportunities, alongside supply chain opportunities for local businesses. We will set out more details of these opportunities in due course, including ‘Meet the Buyer’ events to introduce local businesses to the opportunities presented through our main supply chain partners.

We are also committed to introducing community benefit funding, recognising the important role host communities will play in delivering the infrastructure required to meet our national endeavours to build a cleaner, more secure and affordable energy system for homes and businesses across Scotland and Great Britain in the long-term.

In the following section of this Report on Consultation, we will address any specific community feedback relevant to the options we consulted on.

Consultation process

We have received some feedback that our consultation process was not well promoted to affected communities or wider stakeholders and concerns around the timescale provided for feedback to be given.

As we set out in the 'Consultation Process' section of this Report on Consultation, we held a number of public consultation events, public meetings and bilateral and group engagements, using a range of methods to promote our consultations to our stakeholders.

Even at this early stage of development, where our consultation activities are voluntary, we fully recognise the importance of gathering stakeholder input to help inform our development plans. In response to stakeholder feedback, we introduced extensions to our consultation period to encourage anyone interested in these projects to provide their feedback. In addition, we would like to highlight that there will be further opportunity to comment on our proposals through the consenting process and would encourage all stakeholders to fully engage in that formal consultation exercise.

We fully recognise there is always room for improvement and as we look forward to the next round of public consultations, we are committed to apply learning from our first round of consultations to increase awareness, accessibility and coverage of consultation events. We will continue to welcome feedback on how we can further improve how we consult with our stakeholders on our projects.

3.2. Specific Project Related Feedback

Introduction

This section summarises the feedback specific to the Fiddes 400kV Substation project that has been identified through the consultation process and sets out our responses to the key points raised.

The project-specific feedback is set out in the tables that follow under the four themes:

- Community Impact – see Table 3.3.
- Environmental Impact – see Table 3.4.
- Economic Impact – see Table 3.5.
- Technology Impact - see Table 3.6

It should be noted that the feedback which is recorded in the tables presented below is in response to the consultation events which promoted Site 5B as the preferred site, and our response acknowledges this but where relevant indicates how that feedback has been taken into account in relation to the decision to select a new proposed site at Hurlie and where relevant, how the selection of the site at Hurlie has mitigated against those impacts identified in the feedback relating to Site 5B.

The stakeholders have been grouped into the categories outlined in the table below:

Stakeholder Group	Examples
Statutory Consultees	Historic Environment Scotland (HES), SEPA, NatureScot, Local Authorities
Non-Statutory Consultees	RSPB, Scottish Water, Forestry and Land Scotland
Community members and local organisations	Homeowners, local businesses, Residents Associations, elected members
Landowners & occupiers	Landowners, crofters, tenant farmers, occupiers of properties in closest proximity to substations

Table 3.3 Community Impact

Summary of feedback	Contributing Stakeholder Group	Our Response
<p>Cost/benefit analysis of alternatives and the consultation process</p> <p>A number of responses raised concerns regarding the costs and benefits analysis and options analysis. Others expressed the view that that the consultation was not held early enough / not genuine as conclusion is pre-determined and stakeholders feel they don't really have the ability to influence the solution</p>	<p>Community members and local organisations</p>	<p>Our Section on Common Themes and our FAQ address the question of cost, and cost benefit analysis and how alternatives to the project have been considered.</p> <p>Our responses in the FAQ explain our approach to public consultation and how stakeholder views are considered.</p>
<p>Landscape and Visual</p> <p>A number of points were raised by Aberdeenshire Council in relation to landscape and visual impacts, stating that the preferred substation would not affect any designated or otherwise formally valued landscapes. Aberdeenshire Council noted that Site 5B would be set relatively low in the landscape and would be screened by Bruxie Hill in the northeast and mixed woodland on a subtle ridge of land to the southeast.</p> <p>Residential properties would have the greatest degree of visual intrusion (two of which lie within and on the site boundary), as well as roads which are elevated on</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p> <p>Landowners and occupiers</p>	<p>It is acknowledged that with new transmission infrastructure there will be a change to the landscape setting in the areas where the proposed Fiddes 400kV Substation would be sited.</p> <p>Consideration of the landscape and visual impact was undertaken at the outset of the substation site selection process and has been reviewed through the decision to extend the site selection process. The implications for landscape and visual amenity have continued as key factors informing the identification and assessment of alternative sites which has sought to minimise landscape and visual impact and in particular to minimise the potential for adverse impact on residential visual amenity.</p>

<p>the side slopes of the valley. Aberdeenshire Council consider that earth mounding and woodland planting around the site would not alleviate intrusion with respect to more elevated views.</p> <p>Responses from members of the public raised concerns relating to landscape and visual effects. There was a feeling that the area was becoming industrialised and would lose its rural character which would have an effect on the local communities and businesses.</p>		<p>This has been achieved through the identification of an alternative site at Fetteresso Forest, to be known as Hurlie. (see Section 4 below).</p> <p>The subsequent design of the substation will carefully consider key landscape setting elements in order to integrate the project into the wider landscape in such a way that its prominence will be minimised.</p> <p>The following ongoing work will be undertaken as the project develops:</p> <ul style="list-style-type: none"> • Landscape and Visual specialists will be involved in the substation design and will undertake appraisals, which aim to minimise and mitigate landscape and day and night-time visual concerns. • Viewpoints for detailed photography will be agreed with the relevant Aberdeenshire Council, NatureScot and Historic Environment Scotland where appropriate. • An Environmental Impact Assessment (EIA) Scoping Report will be issued to Aberdeenshire Council as the Local Planning Authority that will provide details on how we propose to complete the Landscape and Visual Impact Assessment (LVIA) as part of the EIA. • Once the design is finalised, an Environmental Impact Assessment Report (EIAR) will be written, this will include a specific chapter reporting on the LVIA which will also consider the potential for wider cumulative impacts when viewed against the backdrop of other existing and planned infrastructure in the area. <p>The EIAR will be submitted with the Planning Application to Aberdeenshire Council.</p>
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<p>Construction Impacts</p> <p>Points were made by the public relating to construction and access concerns including seeking reassurance that roads would not be closed off, access to properties restricted or roads and footpaths damaged during construction.</p> <p>Comments raised related to sound, noise and vibration particularly around construction work and noise levels relating to an increase in traffic, particularly HGVs, as well as the level of noise emitting from the substation itself during operation. Additionally, points were raised concerning the levels of dust and pollution which will need careful management and monitoring during construction.</p> <p>Concerns were raised by members of the public relating to the appointment and management of contractors on site during construction. Of specific note were concerns about biosecurity measures that need to be in place when construction staff, vehicles and plant move between farmlands which may cause the spread of pests such as eelworms and Potato Cyst Nematode (PCN).</p> <p>Transport Scotland pointed to the need to ensure the subsequent assessment of the project addresses the potential impact on construction traffic on the main</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p> <p>Landowners and occupiers</p>	<p>Should the proposals receive Planning Consent, we would prepare a Construction Environmental Management Plan (CEMP) prior to construction commencing. Implementation of the CEMP will ensure that best practice measures are employed during construction to manage traffic and vehicle movements to avoid disruption to the local community, and to control noise, dust and prevent pollution. The plan will include strict requirements to safeguard and monitor relevant private water supplies and protect the water environment and wildlife.</p> <p>The selection of the Hurlie site, in Fetteresso Forest ensures that the proposed development will be sited a greater distance from residential properties compared to Site 5B, with the result that the potential for impacts from construction activities is expected to be lower, affecting fewer properties.</p> <p>Noise mitigation is a primary consideration within the substation development and construction process and noise surveys will be carried out with a noise impact assessment completed and reported in the EIAR. This will consider the existing noise levels, potential noise impacts from construction activities, cumulative noise impacts and consideration of any mitigation required.</p> <p>The concern of community safety and construction vehicles is noted. While construction access routes may have to pass through some local communities, the main construction activity will be remote from communities, given the proposed location of the site in Fetteresso Forest.</p>
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<p>road network; and of impacts from the transport of abnormal indivisible loads and the impacts on and suitability of trunk road junctions.</p>		<p>All staff employed on the project will carry identification, wear branded clothing and staff will park in designated areas. Safety is a priority, and our Community Liaison Team will work with local communities and our contractors to monitor and act on safety concerns.</p> <p>The selection of the site at Hurlie avoids major construction activities in agricultural areas substantially reducing `biosecurity risks.</p>
<p>Noise</p> <p>A number of members of the public raised the issue of noise, and the fact that the operation of substations can generate an audible ‘whining’ noise which can be irritating to locals living, working and visiting the area as well as have an impact on wildlife.</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p> <p>Landowners and occupiers</p>	<p>The selection of the Hurlie site, in Fetteresso Forest ensures that the proposed development will be sited a greater distance from residential properties compared to Site 5B, with the result that the potential for impacts from operational activities is expected to be lower.</p> <p>Noise mitigation is a primary consideration within the substation design and noise surveys will be carried out with an impact assessment completed and reported in the EIAR. This will consider the existing noise levels, potential noise impacts from the proposed new infrastructure (once in operation); cumulative noise impacts and consideration of any mitigation required.</p>
<p>Lighting</p> <p>Concerns from members of the public extended to the intrusion of lighting / light spill at night from substations which detracts from the character of the area at night, again making the area feel more industrialised. Effective year round screening appropriate to the area would be needed which would need properly maintained during operation of the substation.</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p> <p>Landowners and occupiers</p>	<p>At this stage in project development, the potential for light pollution cannot be quantified. Construction and operational lighting will be fully assessed in the Environmental Impact Assessment Report (EIAR). The EIAR will include site specific recommendations to mitigate the effects of lighting where necessary.</p> <p>We will be required to adhere to any security lighting requirements relating to the security classification of the site, once that is known.</p>

		<p>Generally, we seek to reduce the use of lighting where practicable: Our substations are not floodlit but instead have motion sensor controlled security lighting, plus work lighting in case of urgent repairs during hours of darkness. Floodlighting will be in use during winter months for construction.</p>
<p>Health</p> <p>Some members of the public raised health concerns (both physical and mental health) with the development of the substation, including levels of stress and anxiety caused by the consultation process. Additionally, there were concerns over the lack of research on the dangers of electromagnetic fields (EMI/EMF) on physical health including suggested links with cancer risk, autism, general wellness and the toll on mental health. Other comments related to the need for more information on how the project would assess the potential health risks of the project including on mental health.</p> <p>Arbuthnott Community Council stated that the project would have an impact upon the mental and physical health of those in the near vicinity of the project.</p> <p>A number of comments were also raised about the consideration of the safety and reliability of the substation given climate change, extreme weather</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p> <p>Landowners and occupiers</p>	<p>Please refer to the ‘Communities and landowner considerations’ section of our FAQ.</p> <p>Understanding the impacts of changing climate conditions for the design of the substation, in terms of increasing frequency and intensity of storms, flooding, high winds, is a core part of the site selection and design approach and will be a key element of the EIA process presented in the EIA Report. For example, the drainage strategy will include a flood risk assessment, the parameters of which will be agreed with Aberdeenshire Council to ensure climate adjusted assumptions are taken into account.</p>

<p>conditions and the expected greater frequency of storms and flooding. Issues related to the risk of damage being caused to substation in storms and then the risk to residents, businesses and livestock from extended power outages.</p>		
<p>Cumulative Impacts</p> <p>Some points from consultees related to cumulative impacts, particularly around the presence of current overhead lines, substations and transmission towers, other proposed projects and the other components of this project particularly in relation to landscape and visual impacts.</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p> <p>Landowners and occupiers</p>	<p>Cumulative impacts are assessed in the EIA process and reported within the impact assessment chapters in the EIAR taking account of other relevant existing and planned infrastructure in the area.</p> <p>Landscape and visual, noise, historic and natural heritage issues are primary considerations of the project and detailed impact assessments will be completed through the EIA process. These will consider the existing environment (including other existing projects on the ground), potential impacts from the project and cumulative impacts when considered along with other potential future projects including the proposed new 400kV OHL which is proposed to connect with the new substation.</p> <p>The EIAR will also assess the potential for the interaction or combination of different impacts from the project on people and communities, for example landscape and visual and noise impacts considered together.</p>
<p>Mitigation</p> <p>Mitigation measures proposed by Aberdeenshire Council included earthworks and planting which would provide immediate screening of lower elements of the substation. Advance planting should be undertaken of</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p>	<p>The review of the site selection process and the decision to propose the Hurlie site at Fetteresso Forest mitigates potential impacts, including those identified by the local community, compared to the original preference, Site 5B.</p>

<p>trees, woodlands and hedgerows within approximately 2km of the site. They indicated that mitigation should help screen the development and would also enhance biodiversity and landscape character.</p> <p>Arbuthnott Community Council stated that there are no realistic mitigation measures that would reduce the landscape impacts and they considered that the substation is not located correctly.</p> <p>Further meetings have been requested with us by the statutory consultees to discuss matters such as road safety, landscape and visual impacts, sensory amenity matters and public access matters.</p>	<p>Landowners and occupiers</p>	<p>As the design of the substation progresses, we will seek further opportunities to avoid or minimise impacts through design and the way that the substation will be constructed. Where avoidance is not possible, mitigation will be applied through the EIA process. Specific mitigation measures will be discussed and agreed with statutory consultees along with further general mitigation measures, and measures will be provided in a Schedule of Mitigation in the EIAR.</p> <p>In addition to mitigation, we will also deliver Compensatory Planting and Biodiversity Enhancement and suggestions made by consultees will be considered by the project team and incorporated into the design where practical. Section 3.1 provides further detail on this discusses this and includes a reference to a paper for further information Error! Bookmark not defined.</p>
<p>Electromagnetic Interference (EMI/EMF)</p> <p>Concerns were raised by the Radio Protection Network related to the potential for the project to specifically interfere with BT’s current and future radio network. Similar concerns were expressed by the community more generally on mobile and internet signals in the area, and future connections if the substation was expanded. Concerns were also raised about interference with the communication equipment used by farmers and emergency response vehicles (including potential impacts Global Positioning Systems (GPS)).</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p> <p>Landowners and occupiers</p>	<p>As our design develops, where impacts on radio, mobile and internet signals are highlighted as having the potential to occur, we will work with the relevant providers to provide solutions to mitigate any impacts to service.</p> <p>Any impact on wildlife from the construction and operation of the project will be considered as part of the EIA process.</p>

<p>Some comments related to the impact of EMI/EMF on wildlife and in particular, birds, bats and bees.</p>		
<p>Community Viability</p> <p>Public respondents were concerned about the amenity and the character of the area, considering that the area would be less rural and less attractive to future families, businesses and visitors which may ultimately affect the viability of the area as residents move away and the demand for services and facilities reduces.</p> <p>Arbuthnott Community Council stated that the project would reduce the size of the community and the ability to sustain itself in future.</p> <p>Mearns Community Council stated that they felt there needed to be an explanation as to what the benefits would be for the area should a substation be developed and there were concerns raised about the detrimental effect on quality of life for people living locally.</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p> <p>Landowners and occupiers</p>	<p>We have recently announced a Community Benefit Fund. This fund is the first of its kind for transmission operators in Scotland and will provide a direct opportunity for us to work with local communities that will be affected by the project on a variety of local initiatives. These will be community led and will directly support communities across the North of Scotland. In addition, our FAQ also refers to our approach to addressing potential impacts.</p>

Table 3.4 Environmental Impact

Summary of feedback	Contributing Stakeholder Group	Our Response
<p>Biodiversity, Habitats, Protected Species and Designated Sites</p> <p>NatureScot raised comments about natural heritage, specifically identifying the potential for the substation to impact upon qualifying features of nearby Special Protection Areas (SPA). They stated that there will be no direct impact upon any designated area for nature conservation, although there is potential for connectivity with a number of SPAs which are designated for their bird interests. Montrose Basin SPA and Ramsar site is located within 20km, designated for overwintering greylag geese and pink-footed geese which can forage 15-20km from the SPA boundary. Fowlsheugh SPA is approximately 5km from the site, designated for breeding seabird species, of which the herring gull can travel inland to feed. A Habitat Regulations Appraisal (HRA) was suggested to be provided at the application stage.</p> <p>Comments from members of the public related to habitats (including watercourses), wildlife, ornithology and protected species, disruption and disturbance to birds being noted as a concern. Other</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p> <p>Landowners and occupiers</p>	<p>Wildlife and natural heritage aspects have been a key consideration during the site selection process undertaken to date, and the number and variety of natural heritage designations in the vicinity of the substation site options has informed the selection of both the original preferred site and the proposed Hurlie site. One of the factors supporting the original preferred site was the limited opportunity for natural heritage impact. This is largely true of the Hurlie site, although the potential presence of species such as red squirrel, badger and water vole using the plantation habitat is noted. A key consideration is the presence of goshawk which are known to be present at Fetteresso and which have been the focus of research and monitoring by Forestry and Land Scotland (FLS) for several years.</p> <p>We will engage closely with FLS on the evolving design of the substation and on our proposals for biodiversity net gain and compensatory planting.</p> <p>We will continue to liaise with statutory consultees through the next stage of the project which will involve ecologists considering the scope of the EIA in terms of ecological and ornithological (bird) surveys and assessments. We will also consider the terms of any Habitats Regulations Appraisal (HRA) which may be required where the proposals could affect the interests of the most important sites designated as SACs or SPA/Ramsar sites.</p>

<p>areas of concern included badger setts, deer population, migratory geese and bat populations that may be impacted by the project.</p>		<p>We note the legislative requirements with regard to protected ecological sites, and Government planning, natural heritage and environmental policies relating to avoiding and minimising impacts on protected sites and species.</p> <p>Noting the expectations to demonstrate that the impacts can be reduced to a level which would allow the proposals to be consented, the following work, which has already commenced, will be continued as the project develops:</p> <ul style="list-style-type: none"> • Fieldwork by ecologists and ornithologists to survey key habitats and species to provide a baseline understanding of the site and wider area’s ecological importance. • Involvement of ecological specialists in the substation design to undertake appraisals, which aim to avoid and mitigate ecological impacts on protected sites and species. • Preparation of an EIA Scoping Report and an HRA Screening and Scoping Report will be issued to Aberdeenshire Council that will provide details on how we propose to complete the ecological assessments. • Once the design is finalised an Environmental Impact Assessment Report (EIAR) will be written, this will include specific chapters reporting on the predicted ecological and ornithological impacts of the proposals including the potential for wider cumulative impact when viewed against the backdrop of other existing and planned infrastructure in the area. • A HRA report will also be produced (if required) setting out how the project performs against the requirements of The Conservation (Natural Habitats, &c.) Regulations 1994. • The EIAR and HRA report (if required) will be submitted with the Planning Application to Aberdeenshire Council.
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		<p>In addition to avoiding and minimising ecological impacts, we will look to mitigate further any adverse ecological and ornithological effects with Compensatory Planting and Biodiversity Enhancement measures which will be agreed with the statutory consultees. Species Protection Plans (SPPs) will be agreed with NatureScot for all key protected species which have the potential to be adversely affected by the proposals.</p>
<p>Cultural Heritage</p> <p>Historic Environment Scotland (HES) highlighted specific cultural heritages assets in proximity to the substation options (eg Scheduled Ancient Monuments and Listed Buildings) which should be considered in the assessment. It is considered by HES that the setting of Hillhead, Long Cairn 320m southwest of Upper Craighill (SM4534) would have the most sensitivity to potential impact upon its setting from the proposed substation. However, it is noted that the level of impact would not be of national interest.</p> <p>HES noted that Site 5A would be assessed very similarly to the preferred Site 5B due to their close proximity. Additionally, HES stated that Site 8B would be much closer to a number of heritage assets with the potential for significant impacts to arise on the setting of the Hillhead, Long Cairn 320m SW of Upper Craighill (SM4534).</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p> <p>Landowners and occupiers</p>	<p>From extensive work completed already we are aware of the cultural heritage designations and assets within the area of substation site options, and in particular the association of the area around Site 5B with the author, Lewis Grassie Gibbon. Seeking to minimise impacts on cultural heritage assets and values was a key factor in the decision to extend the site selection exercise and, subsequently in the identification of the proposed site at Hurlie in Fetteresso Forest (see section 4 below).</p> <p>We will continue to liaise with HES and Aberdeenshire Council through the next stage of the project which will involve cultural heritage specialists considering the scope of the EIA in terms of further cultural heritage surveys and assessment of the potential impacts of the substation proposals on cultural heritage.</p> <p>We note the legislative requirements with regard to protection of cultural heritage sites, and Government and Planning Policy relating to avoiding and minimising impacts on protected sites and the expectations to demonstrate that the impacts will be avoided or reduced to an acceptable level.</p>

<p>HES also noted that the 11 other options that were discounted for non-heritage reasons may provide a slightly preferable site in comparison to options 5A, 5B and 8B.</p> <p>Other concerns raised by members of the public related to the impact that the proposed substation would have on cultural heritage within the area, with particular reference to Lewis Grassic Gibbon³.</p>		
<p>Flooding and Water Resources</p> <p>SEPA stated that Private Water Supplies (PWS) should be identified, and any potential impact should be assessed. SEPA identified PWS at Upper Pitforthie, Little Barras and Upper Craighill around Site 5B although all of these are over 250m away from the proposed site. In addition, SEPA stated in relation to Site 5B, there are unlikely to be any significant impacts on PWS.</p> <p>SEPA stated that flood risk associated with the small watercourses in the vicinity of the substation sites would need to be assessed and they are not included within SEPA flood risk mapping.</p> <p>The small watercourse which runs through site north of Greenden (a tributary of the Bridgend Burn) will</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p> <p>Landowners and occupiers</p>	<p>Hurlie has some benefits compared to the original preferred Site 5B, notably in there being fewer private water supplies in proximity to the proposed site.</p> <p>While there are no areas identified from existing information suggesting flood risk at Hurlie, the possibility of a micro-flood plain associated with the Burn of Day will be explored with Aberdeenshire Council and, should a detailed flood risk assessment be required, it will be progressed according to the Council's requirements.</p> <p>The micro-siting and subsequent design of the substation will seek to avoid direct and indirect impacts to the Burn of Day.</p> <p>Peat probing has established that there are no deposits of peat within the broad area proposed for the substation, with the exception of a very small pocket in the southeast of the area investigated which can be avoided through micro-siting.</p>

³ Lewis Grassic Gibbon (pen name for James Leslie Mitchell) was a Scottish author who wrote books including Grey Granite, Stained Radiance: A Fictionist's Prelude and Sunset Song which was set in the Mearns and became his most popular novel which has been adapted for TV, radio, film, theatre and music. He died in 1935.

<p>need further detailed and careful consideration before final site selection.</p> <p>SEPA noted that culverting for land gain would not be considered acceptable and that the watercourse appears to have previously been artificially straightened and they would welcome any investigation into the possibility for renaturalisation.</p> <p>SEPA further stated that if access were from the track to the northeast, no landraising associated with any watercourse crossing should occur, and bridging of the Bridgend Burn would need to take account of 1 in 200 flood flows and climate change.</p> <p>Further investigations were suggested by SEPA regarding habitat surveying due to the possibility of wetland/marsh onsite as well as peat, with a recommendation for peat probing.</p> <p>SEPA stated that Sites 2, 6, 8 and 8A are just as preferable in terms of potential impact on watercourses as there are either none present on site or there are manmade drains rather than natural watercourses. SEPA also stated that other sites have the potential to move forward with assessment due to lack of PWS's in close proximity, no apparent flood risk and no significant carbon rich soils present.</p>		<p>We note the legislative requirements with regard to flood risk and water resources, and relevant policy relating to avoiding and minimising impacts.</p> <p>We will ensure that we continue to liaise with Aberdeenshire Council, SEPA and Scottish Water at the EIA Scoping stage to set out the scope and approach to the EIA.</p> <p>The hydrogeology consultants appointed to support the project will work with the project's engineers and other environmental specialists, notably the ecological and landscape and visual teams in the development of the drainage strategy and subsequent SUDS design, to maximise the opportunity for landscape design and biodiversity net gain through the SUDs design and specification.</p> <p>The EIA will consider the construction and operation stages of the development. Through the design and construction planning stages we will aim to avoid and minimise impacts on water resources including from for example run-off, siltation and disturbance to and the Burn of Day, drainage channels and groundwater. As noted in Table 3.3 a Construction Environmental Management Plan (CEMP) will be prepared prior to construction commencing. The CEMP will ensure that best practice measures are employed during construction to prevent pollution. The plan will include strict requirements to safeguard and monitor private water supplies and protect the water environment and wildlife.</p>
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<p>Public respondents raised concerns over issues with flooding within the vicinity of the proposed Fiddes 400kV Substation, namely relating to the Bridgend Burn.</p> <p>Scottish Water stated that there are no Scottish Water drinking water catchments or water abstraction sources which are designated as Drinking Water Protected Areas within the vicinity of the Site which may be affected by the development. Additionally, there are no Scottish Water assets in the areas concerned.</p>		
<p>Contaminated Land</p> <p>Members of the public recommended further survey work for contaminated land and unexploded ordnance in the area of the substation. SEPA noted that all potential sites lie outwith any 1km buffer for potential radioactive substance sources.</p> <p>Members of the public also suggested that brownfield sites should be considered for the proposed 400kV Substation, while others questioned what would happen to the existing substation and what we planned to do with old and obsolete plant and how would they clean up the site.</p>	<p>Statutory Consultees</p> <p>Non-statutory consultees</p> <p>Community members and local organisations</p> <p>Landowners and occupiers</p>	<p>Given the rural and agricultural nature of the area and the absence of former contaminative uses, contaminated land has not been a key factor informing the site selection process. Given the character of land use at Hurlie, the presence of contaminated land is unlikely.</p>

<p>Materials selection, use and waste management</p> <p>A number of responses questioned the approach to ensuring sustainable materials use, equipment re-use and waste management.</p>	<p>Statutory consultees Community members and local organisations</p>	<p>Using resources efficiently is a core principle of our commitment to sustainability, Powering Sustainable Change, and underpins our broad approach to how we develop, build and operate projects, including how we procure equipment and services. At a project design, construction and operations/maintenance level, we ensure strict waste management, through the implementation of Waste management plans and protocols through our Environmental Management Systems and by overseeing the environmental management performance of our contractors.</p>
<p>Cumulative Impacts</p> <p>Public consultee respondents indicated that the development of the substation would need to consider wind farms, pipelines, and other transmission infrastructure in the area.</p>	<p>Statutory Consultees Non-statutory consultees Community members and local organisations Landowners and occupiers</p>	<p>These aspects are discussed above in Table 3.3. The principles for cumulative assessment in the EIA apply also to the environmental topics raised by consultees here and which have been discussed in the previous sections of this table. Proposals for mitigation put forward through ongoing dialogue as substation design and mitigation is progressed.</p>
<p>Mitigation</p> <p>Arbuthnott Community Council stated that there are no realistic mitigation measures proposed that would reduce ecological, environmental and that there are no biodiversity projects which could cancel out the impacts of the project with the belief that the substation is not located correctly.</p>	<p>Statutory Consultees Non-statutory consultees Community members and local organisations Landowners and occupiers</p>	<p>These aspects are discussed above in Table 3.3. The principles for mitigation in the EIA apply also to the environmental topics raised by consultees here and which have been discussed in the previous sections of this table. Proposals for mitigation will be developed through ongoing dialogue as substation design and mitigation is progressed.</p> <p>As noted above, in addition to the EIA mitigation we will set out our commitments to Compensatory Planting and Biodiversity Enhancement⁵ and suggestions made by consultees will be fully considered by the project and incorporated into the design where practical.</p>

Table 3.5 Economic Impact

Summary of feedback	Contributing Stakeholder Group	Our Response
<p>Agriculture and Farming</p> <p>Aberdeenshire Council stated that a robust justification would be required as part of the formal planning application that would result in the loss of Class 3.1 Prime Agricultural Land.</p> <p>Arbuthnott Community Council stated that irreversible damage will occur to the land, and once the land has been taken out of agricultural production it will not be possible to restore it. One point stated that the Mearns and Arbuthnott areas provide the highest yields as prime agricultural land in terms of crops and food production in the UK, noting that as the proposed Fiddes 400kV Substation is likely to be built entirely on prime agricultural land, this will have a significant impact to the farming community.</p> <p>NFUS raised a number of points relating to the loss of prime agricultural land. NFUS consider that farmers in the local communities impacted should receive some benefit, eg guaranteed grid capacity for renewables. It is vital that the community should benefit from the investment.</p> <p>NFU also raised concerns about biosecurity risks related to seed potatoes and the potential spread of Potato Cyst Nematode (PCN), which also threatens daffodil crops. Experience shows that contractors breach their own set down protocols and NFUS members are concerned about the impacts on their farming businesses from inadequate biosecurity. Pre-entry Record of Condition should include PCN / soil sampling. This applies to land</p>	<p>Statutory Consultee</p>	<p>Given the prominence of arable agriculture in the area, it was acknowledged from the outset that a new substation in the vicinity of Fiddes would involve the loss of agricultural land. In extending the site selection process, further consideration was given to minimising the loss of prime agricultural land (grades 1, 2 and 3.1). The selection of the proposed site option at Hurlie avoids this loss of agricultural land and therefore minimises the impact on food security, production and biosecurity.</p> <p>While development at Hurlie involves the loss of commercial forestry, this loss is substantially mitigated through the commitment to compensatory planting. We will explore opportunities for compensatory planting which both replace and enhance woodland habitat.</p> <p>We will work closely with the landowner to avoid and minimise the impacts of the project on commercial forestry by careful design and positioning of the substation infrastructure, temporary construction sites and set down / layout areas, as well as our permanent site and access points. We will involve forestry specialists to ensure that felling plans and the design of cleared development areas are not vulnerable to wind blow.</p> <p>Construction impacts are discussed in Table 3.3. As noted in sections above, should Planning Consent be granted, a Construction</p>

Summary of feedback	Contributing Stakeholder Group	Our Response
<p>surveys and preconstruction activities including those undertaken using drones.</p> <p>Other concerns raised by the public related to the impact the project may have on prime agricultural land, particularly due to the size of the proposed substation, and the impact that it may have on food production and food security, including risks to biosecurity.</p>		<p>Environmental Management Plan (CEMP) will be prepared prior to construction commencing. The CEMP will ensure that best practice measures are employed during construction to control noise, dust and to prevent pollution, recognising the need for robust pollution prevention measures necessary when working in a woodland environment.</p>
<p>Tourism and Other Local Businesses</p> <p>A number of points were raised by Aberdeenshire Council and Arbuthnott Community Council relating to the impact the project may have on tourism in the area, with specific mention to the Lewis Grassic Gibbon Centre. The author's works focused on the surrounding landscape and the defining features, and it is thought that the project will have an irreversible negative impact on his legacy and the operation of the Lewis Grassic Gibbon Centre due to the impacts the project will have on the landscape.</p> <p>Additionally, it is noted that there are many holiday home businesses which depend on interest in Lewis Grassic Gibbon which may be affected by the project.</p> <p>NFUS raise a number of points relating to the loss of agricultural land and that they consider the project would have economic implications for the rural economy.</p> <p>Concerns were raised by the public relating to the future economic viability of the area.</p>	<p>Statutory Consultee</p>	<p>We note the concerns raised about impacts on local businesses notably tourism.</p> <p>As part of our assessments, we will include consideration of socio-economic impacts of the project on sectors such as tourism which form part of the local economy.</p> <p>A number of concerns raised by the community related to the likely impact on local businesses related to landscape, visual and amenity issues. The potential for significant landscape and visual impacts has been largely mitigated through extending the site selection process and selecting the Hurlie site as the proposed location for the new substation. Further, while Fetteresso Forest provides a range of recreational opportunities which represent part of the tourism resource locally, the size of the proposed site relative to the wider Forest does not significantly reduce to extent or range of the recreational offer available.</p> <p>We are actively committed to maximising opportunities to support local businesses and the economy throughout the construction</p>

Summary of feedback	Contributing Stakeholder Group	Our Response
		<p>phase and work with our main contractors to use local supply chains where possible. As the project progresses, we will hold business engagement events and encourage local trades and contractors to work with us.</p> <p>In addition, we have recently announced a Community Benefit Fund. This fund is the first of its kind for transmission operator in Scotland and will provide a direct opportunity for us to work with local communities that will be affected by the project on a variety of local initiatives. These will be community led and will directly support communities across the North of Scotland in a number of ways, for example improvements to tourist facilities may be delivered through the fund.</p>
<p>Property and Land Value</p> <p>Arbuthnott Community Council stated -that people would likely be stuck in unsellable homes as a result of the project due to the impact on rural life.</p> <p>It is also noted by NFUS that property values in communities will be devalued and negatively impacted.</p> <p>Members of the public raised concerns about the impact of the new substation at Fiddes on local property prices and land values.</p>	<p>Statutory Consultee</p>	<p>Our response within the ‘Communities and landowner considerations’ in our FAQ acknowledges our projects may impact land and property and explains how we assess compensation.</p>
<p>Compensation</p> <p>Arbuthnott Community Council and Mearns Community Council stated that they had concerns that the compensation offered would not address the true cost of loss of property rights and any associated damages.</p>	<p>Statutory Consultee</p>	<p>See responses above regarding compensation and how communities may benefit, in the latter, through our recently announced Community Benefit Fund.</p>

Summary of feedback	Contributing Stakeholder Group	Our Response
<p>Arbuthnott Community Council noted that there is no apparent benefit to the local community as a result of the project, noting that windfarm developments are required to feedback to the community through financial support or grants.</p> <p>NFUS consider that farmers in the local communities impacted should receive some benefit, eg guaranteed grid capacity for renewables. It is vital that the community should benefit from the investment.</p> <p>Concerns raised by members of the public related to the lack of compensation that was being provided for those that live / work in the area, with particular concerns relating to the impact on farming business and property devaluation.</p> <p>Queries were raised from some members of the public regarding what the benefits of a substation would bring to those within the community.</p> <p>Public respondents suggested that we could provide funding to local community groups to help increase biodiversity through planting.</p>		

Table 3.6 Technology Impact

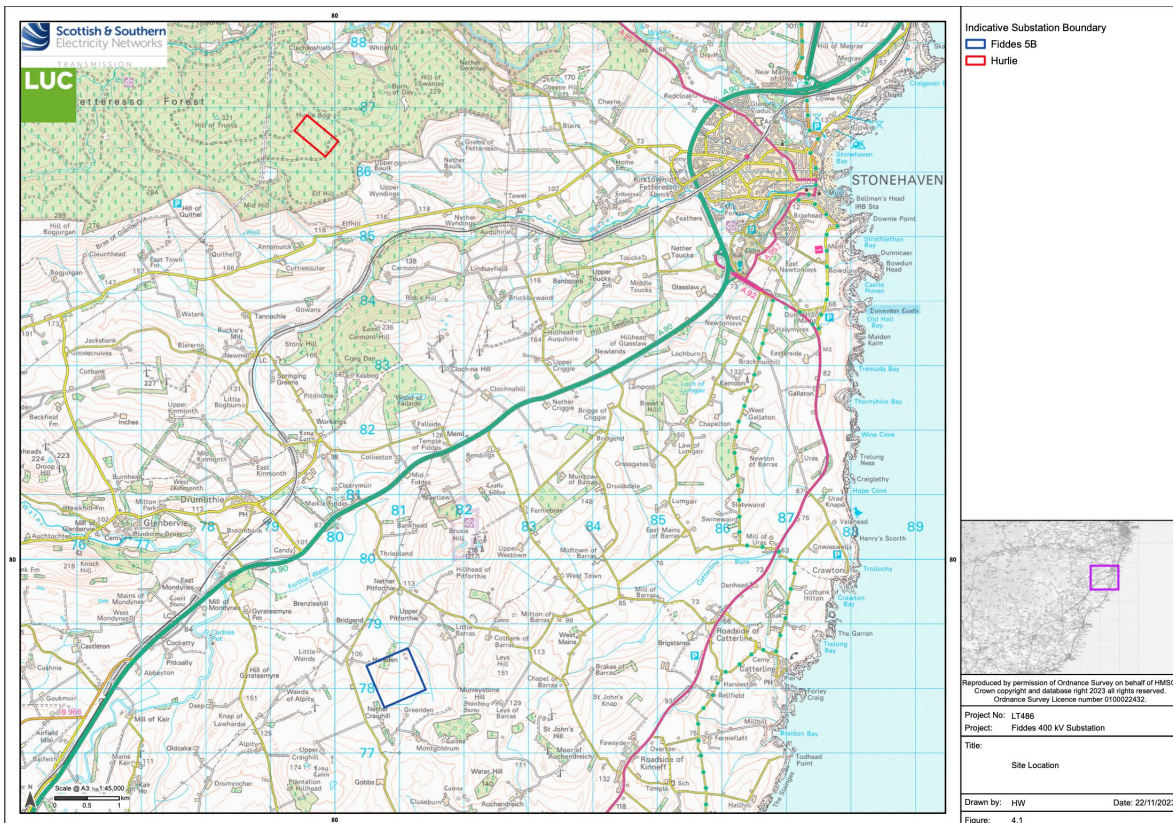
Summary of feedback	Contributing Stakeholder Group	Our Response
<p>Technology choices, drivers and alternatives A number of community responses raised technology related questions, for example, why the existing substation could not be upgraded or extended.</p> <p>Some members of the public asked why substations could not be clustered together with other large energy infrastructure sites such as near existing power stations, near existing or other substations, or near other energy generation facilities such as wind or solar farms, or why they couldn't be located closer to the area of demand eg in towns and cities. Others questioned the size of the substation and why more efficient and therefore smaller, or if different designs were not used.</p> <p>Somes responses asked why substations were being located on green field land and why brownfield sites could not be used.</p> <p>A common suggestion from respondents was to recess the substation into the ground, or behind landscape bunds. A similar point raised related to the question of why the substation could not be located underground or enclosed in a building or hanger / warehouse structure.</p>		<p>As indicated in our Common Themes section above, and in our FAQ, the overall need for the project is defined in the context of the Pathway to 2030 which establishes the need for new transmission infrastructure to contribute towards meeting climate goals, ensuring energy security and supporting Scottish and UK Government targets for a just transition to a net zero future. These needs cannot be achieved by upgrading or extending the existing substation.</p> <p>Clustering major infrastructure and locating substations close to areas of demand poses many challenges. The locations of substations on the transmission grid are influenced by many factors, not least the locations of generation, electrical design, grid management and operability requirements. Other factors include environmental impact and security considerations.</p> <p>The size requirements of the substation are defined by the voltage of the network, which in turn is defined by the amount of power required to be transported, and by the number of connections that are required. The layout is determined largely by the need to meet stringent safety standards for the safe operation and maintenance of the substation equipment.</p> <p>The opportunity to locate substations on brownfield land is a principal criterion in the procedure for selecting new substation sites, and a search of brownfield land was undertaken as part of the</p>

Summary of feedback	Contributing Stakeholder Group	Our Response
		<p>site selection process. No sites, which are large enough and which also met other environmental and technical criteria, such as avoiding risks of pollution or contamination or avoiding challenges in establishing the overhead transmission connections, were identified. In terms of enclosing the substation in an existing structure, similar constraints exist– identifying a large enough site in the optimum location necessary to accommodate the electrical infrastructure. In terms of recessing or burying the substation, while burial would not be cost effective because of the volume of material to be excavated, recessing the substation into the landscape and using excavated material to create landscape bunds is not uncommon and will be explored fully in the substation design process. At Hurlie, initial estimates suggest there will be substantial quantities of fill material that will be available for landscaping.</p>

4. Summary of Key Decisions

As a result of early consultation feedback from communities, Community Councils and Local Councils, a review of the initial site selection exercise and further information on likely future connection requirements, the decision was taken to revisit and extend the site selection exercise, widening the area of search with a view to seeking alternative site options to those presented in the Consultation Document published in May 2023. New candidate sites were identified and appraised. Following detailed assessment of environmental, technical and engineering/cost factors, a new location at Hurlie, in Fetteresso Forest was selected as the proposed site option to be taken forward into the design and consenting process (Figure 4.1).

Figure 4.1



Hurlie was selected as the preferred site option following more detailed assessment of the alternative candidate sites for the proposed Fiddes 400kV Substation based on an increased search area.

Hurlie avoids direct impacts on residential properties, has limited interaction with heritage assets, limits likely significant effects on existing land-use and has potentially fewer impacts on landscape character than other candidate sites. Hurlie, like all of the alternative sites, was compared with the previous preferred option Site 5B in a side-by-side analysis of their environmental and technical constraints and the potential for adverse interactions with receptors and is considered to be the least environmentally constrained site of the shortlisted alternative candidate sites.

We now propose to further develop the Hurlie site as part of our Planning Application due for submission next year.

The change in substation location to Hurlie has necessitated the requirement to carry out a routing exercise in relation to the proposed Kintore to Tealing 400kV Overhead Line (OHL) project (in Section D and in part of Section E of the preferred OHL corridor) to allow the Tealing to Kintore OHL to connect with the new substation location at Hurlie. The proposed Kintore to Tealing 400kV Overhead Line Report on Consultation⁴ provides more information on the new OHL routes under consideration.

⁴ SSEN Transmission (2023), Kintore-Fiddes-Tealing 400kV Overhead Line Report on Consultation. Available online at: <https://www.ssen-transmission.co.uk/projects/2030-projects/East-Coast/>.

5. Next Steps

5.1. Ongoing Engagement

The period of consultation described in this report is part of an ongoing engagement process that spans the full development cycle for the project, where feedback is sought at different stages and engagement with stakeholders is continuous as we refine our proposals.

Early Engagement	Ongoing Detailed Engagement	Advanced Engagement	Ongoing Engagement
<ul style="list-style-type: none"> Project webpage live Early meetings offered to elected members Early discussion with statutory consultees Initial Project Consultation 	<ul style="list-style-type: none"> Analysis of feedback received from consultation Proactive and responsive stakeholder follow up meetings Engage community working groups Publish FAQs, project updates and next steps Publish a Report On Consultation Engage on the report on consultation e.g. Webinar 	<ul style="list-style-type: none"> Pre-consultation engagement Further project consultation Analysis of feedback received from consultation Follow up meetings Publish FAQs, project updates and next steps Publish a Report On Consultation Engage on the report on consultation e.g. Webinar 	<ul style="list-style-type: none"> Pre-submission information sharing event Targeted engagement with those most affected Working group meetings Ongoing project updates Post consent and construction

Following publication of this Report, we, alongside specialist consultants and contractors, will further develop the design of the site.

In Spring 2024, we will hold our first formal Pre-Application Consultation (PAC) event, following the statutory requirements of the planning process⁵. As part of this PAC process, we will present the rationale for the selection of Hurlie, and present indicative information on the likely extent, layout and appearance of the proposed Substation, and give stakeholders and the community the opportunity to comment on our proposals. This event will be followed by a second PAC event, where we will present our analysis of the consultation feedback and explain how that has informed our final design and proposals that will be the focus of our subsequent planning application.

A request for an EIA Scoping Opinion will be made to Aberdeenshire Council and an EIA Scoping Report will be prepared and submitted to support the request. The request for a Scoping Opinion is made to identify the scope of impacts to be addressed and the method of assessment to be applied in the Environmental Impact Assessment (EIA) Report which is prepared and submitted with the Planning Application for consent. The request for a EIA Scoping Opinion, on which consultees, including community councils will have an opportunity to comment, will likely be made in Spring 2024.

⁵ The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (As Amended)

5.2. Feedback

Feedback on this Report or about the project is welcome via our Community Liaison Team who can be contacted using the details below:

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Scottish and Southern Electricity Networks Transmission

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Further information about the project is available on the project website:

<https://www.ssen-transmission.co.uk/projects/project-map/fiddes-400kv-substation/>

6. Glossary

Term	Definition
Air Insulated Switchgear (AIS) Substation	An AIS substation is constructed with switchgear which relies on open air components, which can require large clearance areas for operation and safety, which takes up a larger area of land than Gas Insulated Switchgear (GIS).
Alignment	A centre line of an overhead line OHL, along with location of key angle structures.
Amenity	The natural environment, cultural heritage, landscape and visual quality. Also includes the impact of SHE Transmission's works on communities, such as the effects of noise and disturbance from construction activities.
Ancient Woodland	Defined in National Planning Framework (NPF) 4 as " <i>land that has maintained continuous woodland habitat since at least 1750</i> ".
Ancient Woodland Inventory (AWI)	AWI is a provisional guide to the location of Ancient Woodland. It contains three main categories of woodland, all of which are likely to be of value for their biodiversity and cultural value. These include Ancient Woodland, Long-established woodlands of plantation origin (LEPO), and other woodlands.
Area of Search (Study Area)	A broad geographical area within which possible sites might be capable of identification within approximately 5km of the required connectivity point; usually determined by geographical features such as coastlines or hill/mountain ranges, or designation boundaries, such as National Park boundaries.
Biodiversity Net Gain (BNG)	Biodiversity Net Gain (BNG) is an approach to development that aims to leave the natural environment in a measurably better state than it was pre-development. It focuses on the change in the biodiversity value of a site, comparing the pre and post construction biodiversity values to ensure a positive impact overall.
Conductor	A metallic wire strung from support structure to support structure, to carry electric current.
Consultation	The dynamic process of dialogue between individuals or groups, based on a genuine exchange of views and, normally, with the objective of influencing decisions, policies or programmes of action.
Corridor	A linear area which allows a continuous connection between the defined connection points. The corridor may vary in width along its length; in unconstrained areas it may be many kilometres wide.
Double circuit	A double circuit transmission line comprises of two independent circuits each made up of three sets of conductors (cables).

Environmental Impact Assessment (EIA)	A formal process set down in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 used to systematically identify, predict and assess the likely significant environmental impacts of a proposed project or development.
Engagement	The establishment of effective relationships with individuals or groups.
Electricity System Operator (ESO)	National Grid is the Electricity System Operator (ESO) for Great Britain. The ESO balances electricity supply and demand to ensure the electricity supply.
Gardens and Designed Landscapes (GDLs)	The Inventory of Gardens and Designed Landscapes lists those gardens or designed landscapes which are considered by a panel of experts to be of national importance.
Gas Insulated Switchgear (GIS) Substation	A GIS substation is constructed with switchgear with gaseous reliant components which allows operation and safety clearances to be reduced compared to an AIS substation.
Habitat	Term most accurately meaning the place in which a species lives, but also used to describe plant communities or agglomerations of plant communities.
Holford Rules (as modified)	Principles developed by the late Lord Holford in 1959 which continue to be employed as the basis for routing high voltage overhead lines and include additional notes on the siting of substations.
Kilovolt (kV)	One thousand volts.
Landscape Character Type (LCT)	A distinct, recognisable and consistent pattern of elements in a landscape that differentiate the area from another.
Listed Building	Building included on the list of buildings of special architectural or historic interest and afforded statutory protection under the 'Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997' and other planning legislation. Classified categories A – C(s).
Micrositing	The process of positioning individual structures to avoid localised environmental or technical constraints.
Mitigation	Term used to indicate avoidance, remediation or alleviation of adverse impacts.
National Scenic Area (NSA)	A national level designation applied to those landscapes considered to be of exceptional scenic value.
Offshore Integrated Link	Offshore cable connection between the onshore network and offshore network being developed as part of the Coordinated Offshore Network. This is being developed as a result of the Holistic Network Design (HND) publication in summer of 2022 produced by National Grid Electricity System Operator (NGESO) to facilitate greater co-ordination and efficiency for offshore windfarms. In the autumn of 2022 Ofgem published their Asset Classification findings which in turn

meant SSENT were tasked with delivering large parts of the Coordinated Offshore Network.

Overhead line (OHL)	An electric line installed above ground, usually supported by lattice steel towers or wooden poles.
Planning Application	Used in this context to describe an application for consent under the Town and Country Planning (Scotland) Act 1997.
Plantation Woodland	Woodland of any age that obviously originated from intentional planting.
Preferred Option	The option which SSEN Transmission believes offers the best balance of technical and environmental impact considerations identified through initial assessment. This is then subject to consultation with stakeholders, where local and previously unknown considerations may confirm or alter the initial preference. Once confirmed, this becomes the Proposed Option to take forward to the next stage of project development.
RAG Rating	A Red, Amber, Green rating provided to allow for a comparison between different options being appraised.
Red Line Boundary (RLB)	This area should include all land necessary to carry out the Proposed Development.
Riparian Woodland	Natural home for plants and animals occurring in a thin strip of land bordering a stream or river.
Route	A linear area of approximately 1 km width (although this may be narrower/wider in specific locations in response to identified pinch points / constraints), which provides a continuous connection between defined connection points.
Routeing	The work undertaken which leads to the selection of a proposed alignment, capable of being taken forward into the consenting process under Section 37 of the Electricity Act 1989.
Scheduled Monument	A monument which has been scheduled by the Scottish Ministers as being of national importance under the terms of the 'Ancient Monuments and Archaeological Areas Act 1979'.
Section 37 Application	An application for consent under Section 37 of the Electricity Act 1989 to develop an overhead electricity line.
Semi-natural Woodland	Woodland that does not obviously originate from planting. The distribution of species will generally reflect the variations in the site and the soil. Planted trees must account for less than 30% of the canopy composition
Site of Special Scientific Interest (SSSI)	Designated area of national importance for natural heritage. The aim of the SSSI network is to maintain an adequate representation of all natural and semi-natural habitats and native species across Britain.
Span	The section of overhead line between two structures.

Special Area of Conservation (SAC)	An area designated under the EC Habitats Directive to ensure that rare, endangered or vulnerable habitats or species of community interest are either maintained at or restored to a favourable conservation status.
Special Landscape Area (SLA)	Landscapes designated by The Highland Council which are considered to be of regional/local importance for their scenic qualities.
Special Protection Area (SPA)	An area designated under the Wild Birds Directive (Directive 74/409/EEC) to protect important bird habitats. Implemented under the Wildlife and Countryside Act 1981.
Stakeholders	Organisations and individuals who can affect or are affected by SHE Transmission works.
Study Area	The area within which the corridor, route and alignment study takes place.
Substation	A node on the network to allow safe control of the electricity network. This could include convergence of multiple circuits, transformation of voltage or other functions to maintain and operate the electricity network.
Substation Site Area	Site area identified as necessary to deliver all the substation infrastructure requirements e.g. platform, access tracks, temporary construction area, drainage including SUDS, landscaping.
Sustainable Urban Drainage Systems (SUDS)	Drainage solutions that provide an alternative to the direct channelling of surface water through networks of pipes and sewers to nearby watercourses.
Terminal Structure	A structure (tower or pole) required where the line terminates either at a substation or at the beginning and end of an underground cable section.
The National Grid	The electricity transmission network in the Great Britain.
UK Biodiversity Action Plan (UK BAP)	The UK BAP was published in 1994 after the Convention on Biological Diversity. It summarised the most threatened species and habitats in the UK and gave detailed plans for their recovery.
Volts	The international unit of electric potential and electromotive force.
Wayleave	A voluntary agreement entered into between a landowner, upon whose land an overhead line is to be constructed, and SHE Transmission
Wild Land Area (WLA)	Those areas comprising the greatest and most extensive areas of wild characteristics within Scotland.
Works	Constructing new transmission infrastructure such as substations, overhead lines, underground cables; major refurbishment of these; the dismantling and removal of any parts of the system; and associated works, which may include formation of access tracks, bridge and road improvements, tree cutting, drainage etc.

7. Appendix 1

Table A1.1 Statutory Consultee Feedback

Organisation	Statutory Consultee Feedback	Our Response
Statutory Consultees – excluding Community Councils		
Aberdeenshire Council	<p>Site 5B largely consists of Class 3.1 Prime Agricultural Land. We would therefore be seeking robust justification for the loss of such land as part of any formal planning submission.</p> <p>The preferred site would not affect any designated or otherwise formally valued landscapes.</p> <p>The preferred site option 5B is set relatively low in the landscape within a broad valley and would be screened by Bruxie Hill to the north-east and a mixed woodland and subtle ridge of land to the south-east. Higher ground would also provide screening to the south-west. Views are more open from the north-east along the valley from, for example, the A90, although the distance of the preferred substation site and speed of traffic would be likely to reduce intrusion with the higher infrastructure on the site, including the new 400kV line terminal towers, likely to be the most visible feature. Screen planting has potential to mitigate visual impacts to some degree from this direction. The greatest degree of visual intrusion would be likely to be experienced from nearby residential properties (two of which lie within and on the boundary of the preferred site 5B) and roads some of which are elevated on the side slopes of the valley. Earth mounding and woodland planting around the proposed site would not alleviate intrusion in respect of more elevated views.</p>	<p>The responses provided by Aberdeenshire Council relate to the previous preference, Site 5B. The selection of Hurlie as the proposed site removes the concern regarding a justification for the loss of prime agricultural land and the relevance of the comments on landscape and visual constraint.</p> <p>With regard to landscape and visual amenity, the existing landscape character of Hurlie is already modified by forestry plantation. The importance of the Highland Fault diminishes towards Stonehaven. The proposed substation could be accommodated between two hills, mitigating visibility, with further opportunity for mitigation through micro-siting the substation platform. While visible, there are no focal points or features which represent notable visual amenity. No properties identified are considered likely to be at risk of loss of residential visual amenity (RVA) by virtue of the development being overbearing or overwhelming</p>

<p>Historic Environment Scotland (HES)</p>	<p>The feedback response included an annex in which detailed comments were provided regarding the site selection options, and the historic environment assets that should be considered further in the development of the project. These include Listed Buildings, Inventory Gardens & Designed Landscapes, and Scheduled Monuments.</p> <p>At this stage it appears likely that a new substation could potentially be located at this site without raising issues of national interest for our remit. However, this should be confirmed by full assessment once the details of the proposed substation including potential mitigation options, through landscaping, for example are known. We would also note that the cumulative impacts of the proposed option along with the required overhead line infrastructure should be considered when more detailed assessment is undertaken.</p> <p><u>Category A listed buildings and Inventory Gardens & Designed Landscapes</u></p> <ul style="list-style-type: none"> • Arbutnott House Inventory Garden and Designed Landscape lies 2.6km southwest of the proposed substation site 5B. • Category A listed Arbutnott Parish Kirk is located 3.8kms south west of the proposed substation site 5B. • Category A listed Castle of Fiddes is located about 2.6km to the north east of the proposed site. • Category A listed Allardice Castle is a three-storey tower house with vaulted pend dating from the late 17th century. <p>These should be assessed in detail once all specifications of the proposals are understood to determine whether it's significance may be affected.</p> <p><u>Scheduled monuments</u></p> <p>The ZTV indicates that the proposed substation would be visible from a number of scheduled monuments, including the following:</p> <ul style="list-style-type: none"> • Hillhead, Long Cairn 320m SW of Upper Craighill (SM4534). The proposed substation would be located 450m to the east. 	<p>The responses provided by HES to the site preference expressed in the initial Consultation Document, Site 5B. The selection of Hurlie as the proposed site removes the concerns expressed by HES in that there are no cultural heritage assets in proximity to the Hurlie site that would be affected directly or indirectly (in terms of setting).</p>
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	<ul style="list-style-type: none"> • Montgoldrum, Cairns & Hut Circle 400m E of (SM4754). The proposed substation would be located 1.1km to the north-west. <p>The following scheduled monuments are located in the vicinity of the tie-in area and may also be affected:</p> <ul style="list-style-type: none"> • Hillhead, Long Cairn 320m SW of Upper Craighill (SM4534). • Bruxie Hill, Long Cairn 650m WSW of Ferniebrae (SM4574). <p>The most significant potential impact from the proposed substation for our interests would be on the setting of Hillhead, Long Cairn 320m SW of Upper Craighill (SM4534). Based on the information provided, the level of impact would not likely be of such a level of significance to raise issues of national interest. However, we have concerns about the potential adverse impacts on the setting of the monument.</p> <p>In light of this, we would welcome details about the likely height of the development and a photomontage demonstrating the potential impact on the setting of the monument, should this option be taken forward. Any mitigation measures that would lessen the potential impact, such as screening around the substation, should also be considered.</p>	
NatureScot	<p>We recognise that the preferred sites selected will not impact directly on any protected areas for nature conservation but, as identified in your consultation documents, there is potential connectivity with a number of Special Protection Areas (SPAs) designated for their bird interests:</p> <ul style="list-style-type: none"> • The site at Fiddes is about 20 km from Montrose Basin SPA and Ramsar site where overwintering greylag and pink-footed geese are a qualifying interest. These species can forage from their roost site up to 15 – 20 km. Fowlsheugh SPA is just over 5 km from the site and whilst it's designated for its breeding seabird species one species, herring gull, can travel inland to feed. <p>To help inform the Habitats Regulations Appraisal an assessment of potential effects should be presented at the application stage informed by an</p>	<p>NatureScot's response relates to the preference expressed in the original Consultation Document, Site 5B. The Hurlie site is approximately 28 km from the Montrose Basin SPA and Ramsar Site and 8.5km from Fowlsheugh SPA . While the site at Hurlie is outwith the foraging range for greylag and pink footed geese it is within the possible range for herring gull.</p> <p>We will provide the required detail within the EIAR to assist the HRA.</p> <p>The standing advice is acknowledged and will be adopted, where relevant, in the EIAR.</p>

	<p>appropriate level of survey work. We are commenting separately on the ornithological and ecology scope of works.</p> <p>We have standing advice and guidance on minimising impacts on nature and securing the benefits that nature can provide. The sites selected will avoid impacts on National Scenic Areas and Wild Land Areas. We do not intend to offer comments on landscape and visual impacts for the substations as <u>Aberdeenshire and Angus Council</u> are best placed comment on these.</p>	<p>We will discuss the scope of and approach to the landscape and visual impact of the substation and any cumulative effects, with Aberdeenshire Council, through the scoping process.</p> <p>We will continue to engage closely with NatureScot as the design and EIA processes evolve</p>
<p>Scotland Environment Protection Agency (SEPA)</p>	<p>Has the need for the Project been explained adequately?</p> <p>In relation to our interests the need for this project has been adequately explained in the booklet and previous meetings.</p> <p>Has the approach to select the substation site been explained adequately? In relation to our interests the approach to select the substation has been adequately explained.</p> <p>Are there any factors, or environmental features, that you consider should be reconsidered as part of the site selection process?</p> <p>We welcome reference to SEPA Flood Maps in the site selection process. However, it is unclear if the SEPA Flood Future Maps have been used which now include climate change in the flood extents shown. In relation to the preferred site, Site 5B, the Future Flood Extent does not appear to be significantly greater than our previous flood maps, however, going forward, we will expect our Future Flood Maps to be used and climate change included in any flood risk assessment required in accordance with NPF4 Policy 22.</p> <p>Private Water Supplies (PWS) do not appear to have been considered as part of the site selection process. Around the preferred site 5B, our digital mapping system records only show PWS at Upper Pitforthie, Little Barras and Upper Craighill all of which are more than 250m away from any site boundary. However, the sources for these PWS should be confirmed and considered in any future Environmental Assessment. Should any other Site</p>	<p>Like the responses from other statutory consultees addressed in the rows above, SEPA's response refers to the previous site preference, Site 5B.</p> <p>At Hurlie, the Burn of Day runs across the site W-E (and is shown on the 1:50k OS), it runs in a heavily vegetated narrow channel, and can be avoided and buffered by micro-siting the substation to ensure impacts on the burn are avoided.</p> <p>A key consideration in considering Hurlie has been the possible presence of peat and the implications of mitigation should it be present. Peat probing has confirmed that, with the exception of a small pocket in the SE of the site which is avoidable through micrositing, the soils are <=50cm and are not classed as peat or peaty soils and do not support habitats that would classify them as peatland, and so are unlikely to be considered to require mitigation and compensation.</p> <p>We acknowledge SEPA's general Scoping Guidance for Large Infrastructure Projects and this will be adopted, where relevant, in the EIA.</p> <p>We will engage closely with SEPA as the design and EIA processes evolve</p>

be taken forward, PWS and their sources need to be located and potential impact on them assessed.

Other sites

In relation to our interests several sites other sites (Sites 2, 6 (advantage of disused quarry) 8 and 8A may just as preferable in terms of potential impact on watercourses as these appear to have either no watercourses on site or have manmade drains rather than natural watercourses that have been artificially straightened. Likewise, several other sites appear to have the potential to be taken forward for further assessment with no PWS in proximity, no significant carbon rich soils present and no apparent flood risk. All sites lie outwith any 1km buffer for potential Radioactive substances sources.

Site 5B

There are unlikely to be any significant impacts on PWS (subject to source identification) with regards Site 5B.

However, the small watercourse running through the site north of Greenden, and a tributary to the Bridgend Burn, will need further detailed and careful consideration before final site selection. It should be noted culverting for land gain will not acceptable and we highlight Aberdeenshire Local Development Plan 2023 Policy C4 states a presumption against culverting of waterbodies, and this is supported by our “Culverting of Watercourses – Position Statement and Supporting Guidance”. The watercourse appears to have been artificially straightened in the past and we would welcome the investigation into the possibility of renaturalisation.

We also highlight small watercourses are not included within SEPA flood risk mapping as their catchments are too small, but flood risk associated with this small watercourse will need to be assessed if site 5B is taken forward. A full Flood Risk Assessment may be required depending on the future site layout and extent of buffers around this watercourse. It is presumed access to site 5B will be from minor road to the south-west but if access were from the

	<p>track to the north-east there should be no landraising associated with any watercourse crossing and bridging of the Bridgend Burn would need to take account of 1 in 200 flood flows plus climate change.</p> <p>We note from OS mapping there is also the possibility of wetland/marsh onsite, and we therefore recommend further detailed habitat surveying is carried out before final site selection. In addition, the presence of wetland/marsh may also indicate the presence of peat on site, and we recommend some peat probing is also undertaken before final site selection.</p> <p>We welcome pre-application engagement, but please be aware that our advice at this stage is based on emerging proposals and we cannot rule out potential further information requests as the project develops. Similarly, our advice is given without prejudice to our formal planning response, or any decision made on elements of the proposal regulated by SEPA, which may take into account factors not considered at the pre-application or planning stage going forward. We have included our general scoping comments as an Appendix which you may also find useful.</p>	
Scottish Water	<p>A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the areas that may be affected by the proposed activity.</p> <p>A review of our records indicates that there are no Scottish Water assets (including water supply and sewer pipes, water and waste water treatment works, reservoirs, etc.) in the areas concerned. This should be confirmed however through obtaining plans from our Asset Plan Providers, listed in the SW list of precautions for assets.</p>	<p>Scottish Water’s response relates to Site 5B. We will consult on the proposed site at Hurlie to ensure that no assets are likely to be impacted.</p>
Transport Scotland	<p>Transport Scotland has no specific preference on the location of the proposed Substation, however, it should be noted that regardless of the location chosen, Transport Scotland will require to be satisfied that the potential impact of construction related traffic on the trunk road network is assessed appropriately and in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental</p>	<p>While Transport Scotland’s response relates to Site 5B, the principles it addresses are applicable to Hurlie.</p> <p>A full assessment of construction related traffic impacts on both the trunk and local roads networks will be undertaken, in accordance with IEMA Guidelines, as part</p>

	<p>Assessment of Road Traffic. In addition, the potential impact of the use of Abnormal Indivisible Loads during delivery (if required) will require to be assessed, with a full Abnormal Loads Assessment report provided that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.</p> <p>Transport Scotland would state that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager.</p>	<p>of the EIA process and presented in the Environmental Impact Assessment Report.</p> <p>The need to include an Abnormal Loads and Delivery Traffic Assessment, including swept path assessment as part of the impact assessment, rather than as a condition to the planning application, will be agreed with Transport Scotland through the scoping process.</p> <p>Any requirements for public roads improvements which include the trunk road network will be discussed with Transport Scotland.</p> <p>We will engage closely with Transport Scotland as the design and EIA processes evolve</p>
Statutory Consultees – Community Councils		
Arbuthnott Community Council	<p>We are writing to provide our formal objection to the proposed plan for a new electricity substation to be located in the Arbuthnott area (referred to in the literature as the 'Fiddes' substation), the overhead 400kV electricity line which will run through the Arbuthnott area, and all surrounding and related infrastructure which will run through the area of Arbuthnott and the Mearns.</p> <p>In all of our many discussions, we have yet to speak to any person related to, resident in, or familiar with, the area of Arbuthnott who believes the electricity substation as proposed is in the correct place. There is significant concern about the impact both of the substation and the overhead line. People in our community are quite simply devastated and outraged at the proposals. We have sought to summarise below the primary reasons for concern. It should also be noted that there have been significant deficiencies in the process for obtaining community feedback which raises concern that there are many people who are likely to be significantly affected by these</p>	<p>The concerns raised and information provided have been passed to the relevant project teams and will be used to inform ongoing project development.</p> <p>As with other responses from statutory consultees addressed in this Table, the response from Arbuthnott Community Council relates to the preference expressed in the Consultation Document, namely Site 5B.</p> <p>In relation to the substation specifically, the extension of the site selection process and subsequent selection of the site at Hurlie is considered likely to address some of the concerns expressed by the Community Council regarding the location of the substation.</p>

	<p>proposals who still do not understand the full extent of them and have not had the opportunity to raise their concerns.</p>	
	<p><u>Tourism and the Grassic Gibbon connection:</u> The Grassic Gibbon Centre is a tourist destination as well as a literary and historical archive on the works of Lewis Grassic Gibbon (which were inspired by the Arbuthnott and Mearns area). His works, particularly The Scots Quair, focus upon the land and its defining features and is based upon, and recognisable in, the Arbuthnott area. Lewis Grassic Gibbon lived during his formative years in one of the cottages which is earmarked for compulsory purchase and destruction, and his wife lived in another. It is clear in theme throughout his writings that the writer found his muse in the landscape of Arbuthnott and around his home, and sought to use that to inspire the world to appreciate and protect the land, given its necessity to life. The destruction of the local area will have an irreversible negative impact on the legacy of Lewis Grassic Gibbon and upon the operation of the Lewis Grassic Gibbon Centre. In addition, we would note that there are thriving holiday home businesses in the Arbuthnott area which also depend upon the touristic and historical interest in Lewis Grassic Gibbon, as well as the history of rural life and farming in the Mearns in particular, which will be severely affected by the proposals. You simply would not see industrialisation of this scale in other sites which are of a similar calibre – the birthplace of Shakespeare and the surrounding area of Straford, Dorset with its connection to Thomas Hardy, nor Wales re Dylan Thomas, nor the moors of Wuthering Heights nor Dartmoor re Hounds of the Baskerville. We could go on, but it is clear to us that this is one of Scotland’s great literary and historical landmarks and should be conserved as such. There is no greater proposal for destruction than concreting the entire area and building an industrial substation. Described as a development, the community believe that in future, this development will be viewed as nothing short of vandalism.</p>	<p>The selection of the Hurlie site avoids interaction with the area around Fiddes which is noted for its association with Lewis Grassic Gibbon, in terms of both the substation and the sections of OHL that would have connected the Site 5B and which will follow routes to Hurlie. The Report on Consultation for the 400kV Overhead Line between Tealing and Kintore presents the route options which have now been identified to provide a connection to Hurlie.</p>

	<p><u>Industrialisation of virgin land:</u> Linked to the above, the land at Arbuthnott is historic in nature. It is diverse in ecological terms and supports biodiversity. The proposals will irreversibly damage our environment. Once the land is taken out of agricultural production and damaged so completely, it will never be possible to restore it.</p>	<p>The Community Council’s concerns, as they relate to Site 5B, are largely addressed by the identification of the proposed site at Hurlie. While there are ecological constraints which are different but still relevant considerations, the implications for agricultural land are avoided, while noting that Hurlie would involve the removal of some land from forestry.</p>
	<p><u>Personal impact on residents and the community:</u> It appears that, on a direct scale, those who are being forced from their homes and businesses will lose out in real terms, as no compensation can be given which would recognise the enduring effect that the loss of the area and homes will have upon them. For those in the immediate vicinity but not directly in line for the construction site, the effect is arguably worse. Those looking upon the substation, but not directly affected by it, will also lose their homes and businesses. The value of living in the Arbuthnott community is the rural nature of life – it is in the quiet, the views and the tranquility. That will no longer be available to the neighbours of this monstrosity and it is likely that there will be people stuck in unsellable homes as a result, without recourse to compensation.</p> <p>It will impact both the mental and physical health of those who live in the area to a severe extent. Lives will be destroyed. The substation alone will make a large area of Arbuthnott virtually uninhabitable. It will reduce the size of an already small community.</p> <p>There is also outrage that a development of this nature could be allowed to go ahead without any benefit to the community. We would note that the windfarms which benefit from the natural capital of the Arbuthnott area are required to feedback to the community by way of grants and financial support. There is no such proposal for this development.</p>	<p>The identification of the proposed site at Hurlie would reduce the extent of potential direct impacts on residential properties compared to Site 5B; the implications of the overhead transmission route connecting to Hurlie would be similar in extent to those of Site 5B although it is recognised that different receptors would be potentially affected. We also refer to our response in Section 3.2, Community Benefit.</p>
	<p><u>Significant impact on farming:</u> Arbuthnott and the Mearns comprises prime agricultural land which is vital to food security of the UK, and which is a protected characteristic in planning terms. The amount of prime agricultural land being taken up by the OHL and</p>	<p>The identification of the proposed location at Hurlie addresses the concerns expressed by Arbuthnott Community Council regarding the loss of prime agricultural land. The Report on Consultation for the</p>

	<p>substation is significant and will have an overall impact on the yield achieved by our farmers. As prime agricultural land, the Mearns and Arbutnott areas provide the highest of yields in terms of crops and food production in the UK.</p> <p>The 'Fiddes' substation site (whichever of the proposed and preferred sites are chosen) is likely to be located on 120 acres of prime agricultural land. No other form of development would ever be considered on land of this nature and it appears that the selection process has not considered other industrial sites or areas which are not capable of being farmed – in fact it appears to have avoided other industrial sites entirely to streamline the construction process. SSEN’s own grading process marks the impact of the substation and overhead pylons on agriculture as “medium”. It is hard to see how there could be a worse impact than building a 120 acre substation and all associated infrastructure on prime agricultural land.</p>	<p>400kV Overhead Line between Tealing and Kintore presents the route options now identified to provide a connection to the new site at Hurlie.</p>
	<p><u>Subsea cables, underground cables and other options:</u></p> <p>Our community’s strong view is that this technology should remain where it does not impact on land use and should be taken from the point of generation to the point of use as directly as possible. This means (i) increased use of underground and subsea cabling, (ii) building substations underground/building them into the ground, within existing (plantation) forests, moorlands or other features which naturally shield the infrastructure while having no impact on food security, and (iii) building closer to existing urbanized and industrialised areas where there is a greater need for electricity.</p> <p>In terms of the substation site, the only explanation as to why the proposed sites have been considered is to say that SSEN have been advised by a prior running process that a new substation is required at Fiddes. On this we would note two key points: (1) that prior process was not open to public consultation or scrutiny and appears to have reached the wrong conclusion, and (2) the substation and infrastructure being proposed is not in Fiddes, in line with the recommendation. It appears, from responses from SSEN, that it is simply not possible to build the substation within the existing footprint of the infrastructure in the Fiddes area, as that site is already over-</p>	<p>We point to the our responses in Section 3.2, Common Themes, and in particular, 3.2.1 which addresses the question of Project Need, 3.2.2 which discusses Technology Choice (and alternatives) and section 4 of the document, Frequently Asked Questions.</p>

	<p>industrialised. If that is the case, it is necessary to cast the net more widely and select an appropriate area for a new substation. That should have been recognised and dealt with prior to this consultation, but instead it appears that SSEN have determined unilaterally that the infrastructure would be moved to an entirely new site in Arbuthnott without sufficient consideration of the impact.</p>	
	<p><u>Lack of mitigation:</u> Unfortunately, we are yet to see any realistic proposal for mitigation in Arbuthnott. The Press and Journal reported SSEN as stating that the ‘Fiddes’ substation would be built down into the ground and surrounded by trees to obscure its visual impact. It appears that this statement was untrue, and it will in fact be built up out of the ground to ease access to the substation, by heights of up to 27 metres from current ground level. We believe the reason that no mitigation measures have been proposed is because there is no way in which the devastating impact of the substation on the area can be lessened. There are no trees which can hide it. There are no biodiversity projects which can cancel out its impact. This further suggests that the substation site is simply in the wrong place.</p>	<p>While many of the Community Council’s concerns regarding the lack of mitigation are addressed at Site 5B, the principle of applying mitigation at Hurlie remains very relevant and will inform the both the design of the Substation and the manner in which it be developed, constructed and operated. Identifying and agreeing mitigation measures between us, statutory consultees and contractors will be a main part of the EIA process.</p>
	<p><u>Lack of consultations</u> None of the public engagement campaigns have targeted those living at the coast in the immediate vicinity of Arbuthnott, who will be impacted by this development. Even those living in the immediate vicinity of the substation were not notified of the substation proposal.</p> <p>In the publications, there is no information given about the height of the substation. There is no information on the impact of noise or of traffic.</p> <p>Overall, there is a feeling within our community that the consultation has been a farce, that the chosen routes and sites are incorrect and based upon profit at any cost and that the project will be pushed ahead at speed without any real consideration for the serious longterm consequences at all levels. The strong feeling is that the development as proposed must be stopped.</p>	<p>Details on the Consultation Process adopted is described in Section 2. Please also refer to Section 3.2.5 Common Themes.</p>

<p>Mearns Community Council</p>	<p>We are writing to state our formal objection to the proposed plan for a new electricity substation to be sited in the Mearns area and to the overhead 400kV electricity line which will run through the Mearns area, and all surrounding and related infrastructure which will run through the wider area of the Mearns.</p> <p>It is thought that your consultation has been rushed and many people have not yet had the opportunity to voice their concerns. This especially true for those people who do not have access to computers.</p> <p>There is also concern that the compensation offered will not address the true cost of loss of property rights and any associated damages.</p> <p>We need an explanation as to what benefit the substation and pylons will bring to this area.</p> <p>Given that this proposal will carry power down south, the substation and pylons should be sited down south.</p>	<p>The concerns raised and information provided have been passed to the relevant project teams and will be used to inform ongoing project development.</p> <p>Please refer to the following parts of this report for our responses to the concerns and issues you have raised:</p> <p>We address the concerns regarding consultation in section 3.2.5, Common Themes, Consultation Process, 3.2.4 Socio-Economic Issues, where we discuss community benefit, and 3.2.1 Project Need. Further information is provided in our FAQ.</p>
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Table A1.2 Non-statutory Consultee Feedback

Organisation	Non-statutory Consultee Feedback	Our Response
<p>Joint Radio Company</p>	<ul style="list-style-type: none"> The JRC have been unable to assess the impact of the project on local link infrastructure and makes a holding objection to the proposal until it has the opportunity to assess the potential impact based on the specific location and heights of electrical infrastructure. 	<p>Noted. Feedback will be sought during consultation on the OHL alignment, which will include possible tower locations and dimensions, and as part of the formal Pre-Application Consultation for the substation application.</p>
<p>National Farmers Union (NFU) Scotland</p>	<ul style="list-style-type: none"> Where possible, prime agricultural land to be avoided. Using lower value land would reduce the impact of taking prime, high value agricultural land out of production. Consider using field margins or boundaries for any infrastructure. This would minimise the agricultural impact. Avoid, where possible, separating farms into small parcels of land, ultimately making them unviable. 	<p>Our extension of the site selection process and identification of the Hurlie site avoids the use of prime agricultural land.</p>

Organisation	Non-statutory Consultee Feedback	Our Response
	<ul style="list-style-type: none"> We appreciate you have consulted on the routes etc. We are keen to continue this consultation process, and NFUS is happy to help and support with contacting landowners and ensuring that appropriate agreements are reached. 	
NFU North East Regional Manager	<p>Biosecurity risks appear to threaten several areas, especially where there is a huge risk to particular agricultural crops- eg seed potatoes and the potential spread of Potato Cyst Nematode (PCN). Daffodil crops are also threatened too. Historically, SSEN contractors’ breach their own set down protocols, as evidenced by many growers. Members are questioning the assurance from SSEN that they will ensure full and effective behaviours with regard to adequate biosecurity?</p>	<p>The selection of the site at Hurlie reduces many of the concerns relating to biosecurity. The comments set out in the Report on Consultation for the 400kV OHL, relating to the route options to Hurlie and the biosecurity measures that shall apply, refer.</p>
	<p>Any community investment proposed should go to those directly affected. It would be helpful if SSEN could implement woodland creation in awkward corners of fields left by the scheme. Also, creation of irrigation lagoons/wildlife ponds. Thirdly, creation or upgrade and management of access paths for walking.</p>	<p>The response set out in the section Socio-Economic Impact, Section 3.1 Common Theme</p>
	<p>There will be others mindful of the need for such infrastructure to accommodate the more grid input for renewables that they may have been denied for their own on-farm projects due to capacity issues. Therefore, an important question will be whether this will now unlock a lot more on-farm renewables, or is it purely Kintore to Tealing with no additional input points along its route? We would definitely request that this ought to be a condition attached to any planning application which is granted. Local farmers need access to the grid asap, and SSEN should be able to permit this if their 400kV line is approved.</p>	<p>Please refer to Table 3.5 Economic Impact. The responses provided in Table 3.5 provide information in response to NFUS’s concerns in this consultation feedback.</p>
	<p>Prime agricultural land is defined as Land Use Classification Class 1, 2 and 3.1. Only 8% of Scotland falls within this classification. The various routes proposed by SSEN from their proposed new substation at Fiddes to Forfar will be mainly through class 2 land from; from there it will be mainly 3.1 with some 3.2. There is a presumption against development affecting prime agricultural land and the point is that SSEN seems to have deliberately chosen to use such land without adequate explanation for ruling out other routes.</p>	<p>The fact that our proposed location has been identified as Hurlie addresses NFUS’s concerns regarding the loss of prime agricultural land to the proposed substation. The implications for the new overhead connection to Hurlie are broadly similar in agricultural land terms to those arising from the original route connections to Site 5B. Further</p>

Organisation	Non-statutory Consultee Feedback	Our Response
	Food security is an issue for our growing population. Why should SSEN destroy some of Scotland’s most productive farmland to deliver this project?	analysis is presented in the Report on Consultation for the 400kV Kintore to Tealing Overhead Transmission Line.
National Gas	No written feedback was received. Instead, NG Transmission met with us to share the location and nature of existing gas transmission infrastructure.	The initial site selection process for a substation site was informed by published information on the gas transmission network. The provision of additional information on location, composition and operational requirements has informed the assessment of mitigation options where the OHL and substation location may be in proximity to gas infrastructure along certain sections.
NATS Safeguarding	<p>The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company (“NERL”) has no safeguarding objection to the proposal.</p> <p>However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.</p> <p>If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.</p>	Noted. Further engagement will continue through subsequent consultation stages
Radio Network Protection (BT)	The conclusion is that this could possibly interfere with BT’s current and presently planned radio network.	Noted. We will seek further feedback during consultation on the OHL alignment, which will include possible tower locations and dimensions, and as part of the formal Pre-Application Consultation that will be a part of the planning

Organisation	Non-statutory Consultee Feedback	Our Response
	<p>Please see below BT links that are potentially on the route path and their end to end co-ordinates.</p> <p>When the co-ordinates of the structures at height are available, please send these over and then we can carry out an assessment accurately.</p>	<p>application process for the substation. Both consultations are expected to take place at the end of Q1 2024.</p>

Appendix 2

Public Consultation Advert



Scottish & Southern
Electricity Networks

TRANSMISSION



Scan me

East Coast 400kV Phase 2 Public consultation events

SSEN Transmission are developing proposals between Kintore and Tealing via Fiddes to build a new 400kV connection between these sites enabling the significant power transfer capability needed to take power from onshore and large scale offshore renewable generation connecting on the east coast of Scotland.

The East Coast 400kV Phase 2 project will seek to establish a new 400kV network and reinforce sections of the existing electricity transmission infrastructure.

We are inviting members of the public and all interested parties to attend our drop-in consultation events and give their views on the following proposed projects:

**Kintore – Tealing 400kV OHL
(overhead line)**

Tealing 400kV substation

Fiddes 400kV substation

Alyth – Tealing OHL Re-conductor

Tealing – Westfield OHL Re-conductor

Come along to one of the following sessions and meet with our project team who will be there to talk through the details of the projects and answer any of your questions:

2 May (2-7pm)	Kirkton of Skene – Milne Hall
3 May (2-7pm)	Ardoe – Ardoe House Hotel
4 May (2-7pm)	Laurencekirk – Dickson Hall
9 May (2-7pm)	Brechin – Brechin City Hall
10 May (2-7pm)	Kirriemuir – Westmuir Hall
11 May (2-7pm)	Tealing – Tealing Village Hall
17 May (4-6pm)	Virtual event*

*Joining details available on website

If you have any questions, please contact the Community Liaison Manager:



Martha Smart

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Perth, PH1 3GH

TKUP@sse.com

+44 (0) 7721 407 513

Find out more and register for project updates by visiting the project website using the below URL or by scanning the QR code.

bit.ly/3TLCo2A

All venues have disabled access; for any other accessibility requirements please get in touch.



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