

# **New Beauly Area 400kV Substation and HVDC Converter Station Report on Consultation**

November 2023



**Scottish & Southern**  
Electricity Networks

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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 the proposed 400kV Substation and HVDC Converter Station (herein referred to as 'proposed Beauly substation/converter') in the Beauly area, 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 details of 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. The document confirms which Site option for the proposed Beauly substation/converter 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 Grids ESO's Pathway to 2030 Holistic Network Design, we have developed proposals to reinforce the transmission system and are proposing to construct a new 400 kilovolt (kV) substation in the Beauly area, to facilitate the connection of the new 400kV overhead line (OHL) reinforcements from Spittal and separately from Peterhead together with the proposed Western Isles HVDC link, onto the Transmission Network. For the proposed Western Isles link, we are proposing to construct a new 525kV 1.8GW HVDC converter station close to the new 400kV Beauly substation. This has been identified as the most suitable place on the 400kV network to connect the proposed Western Isles link into.

This RoC covers the proposed Beauly substation/converter. Please refer to the following project specific webpages for Reports on Consultation on the proposed Spittal – Loch Buidhe – Beauly OHL and Beauly – Blackhillock – New Deer – Peterhead OHL:

- [Spittal – Loch Buidhe – Beauly 400kV OHL](#)
- [Beauly – Blackhillock – New Deer – Peterhead OHL](#)



New SSEN Transmission projects under the Pathway to 2030

The proposed new Beauly area 400kV substation shall comprise:

- The construction of a new outdoor AIS 400kV Substation, which would require an area of land approximately 500m x 270m
- Control Building
- Switchgear and busbar
- Land for drainage, landscaping, habitat enhancement and access roads
- Land would also be required on a temporary basis during construction for temporary construction laydown, equipment storage, site offices and welfare facilities.

The proposed new Beauly area 525kV 1.8GW HVDC Converter station shall comprise:

- A new 525kV DC 1.8GW Bi-pole HVDC converter station, which would require an area of land approximately 300m x 275m
- An AC underground cable (UGC) connection to the new 400kV substation
- Land would also be required on a temporary basis during construction for temporary construction laydown, equipment storage, site offices and welfare facilities.

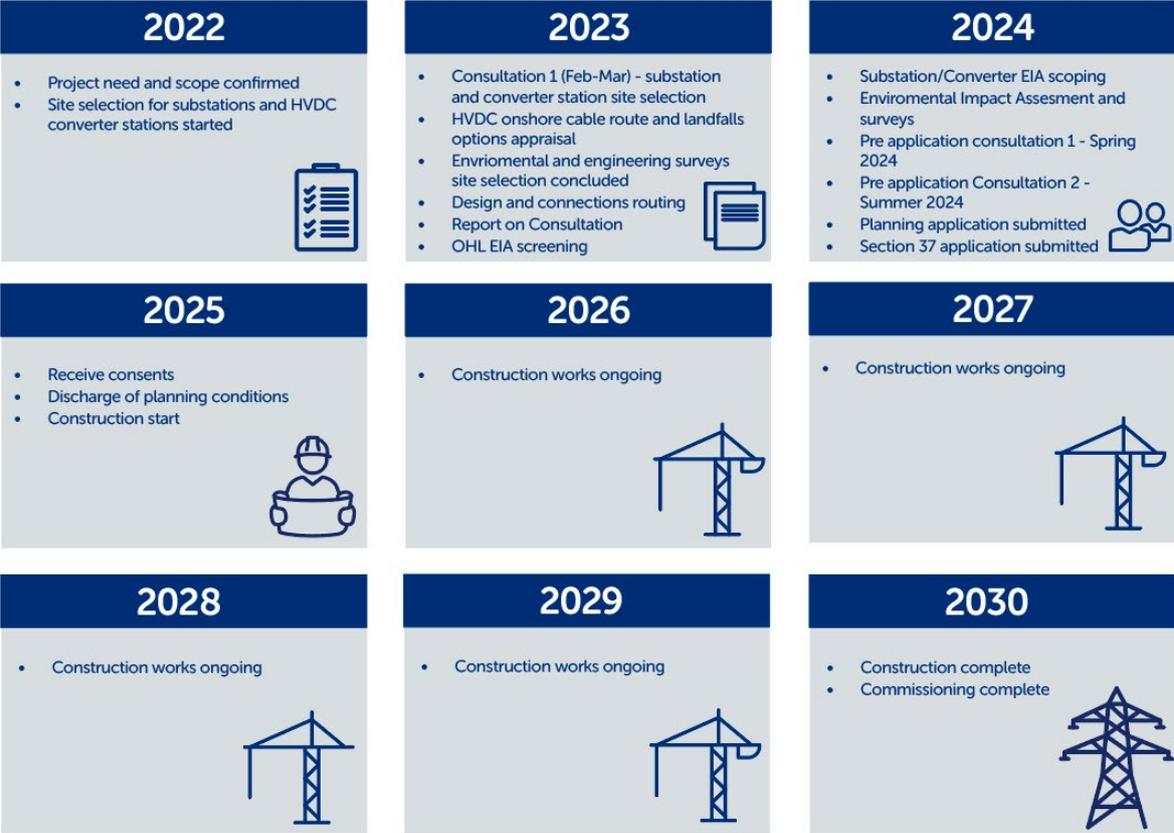
The following proposed new transmission infrastructure will require to connect into the new Beauly substation:

- Spittal- Loch Buidhe- Beauly 400kV OHL
- Peterhead- New Deer- Blackhillock- Beauly 400kV OHL
- Western Isles HVDC underground cable

An online Storymap webpage and Consultation Booklet (issued in March 2023) introduced our site selection exercise and preferred site option for the proposed 400kV Substation and HVDC Converter Station in the Beauly area, at a location referred to as Option 7.

Further information on our Pathway to 2030 projects is available here: [www.ssen-transmission.co.uk/projects/2030-projects/](http://www.ssen-transmission.co.uk/projects/2030-projects/)

### 1.3. Project Timeline



Find out more about our 2030 projects: [www.ssen-transmission.co.uk/projects/2030-projects/](http://www.ssen-transmission.co.uk/projects/2030-projects/)

### 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 Beauly area 400kV substation and HVDC Converter station to provide connections for the Western Isles link and new overhead lines from Spittal and Peterhead. The consultation included information regarding site options, environmental and technical considerations, the project development process and explained the factors which were taken into consideration in the site selection process. The consultation explained how Site options 4, 7, 9, 11 and 11a were assessed in greater detail and that the outcome of the process identified Option 7 (combined) as the preferred site option for both the Substation and HVDC Converter to be taken forward into the consultation process.

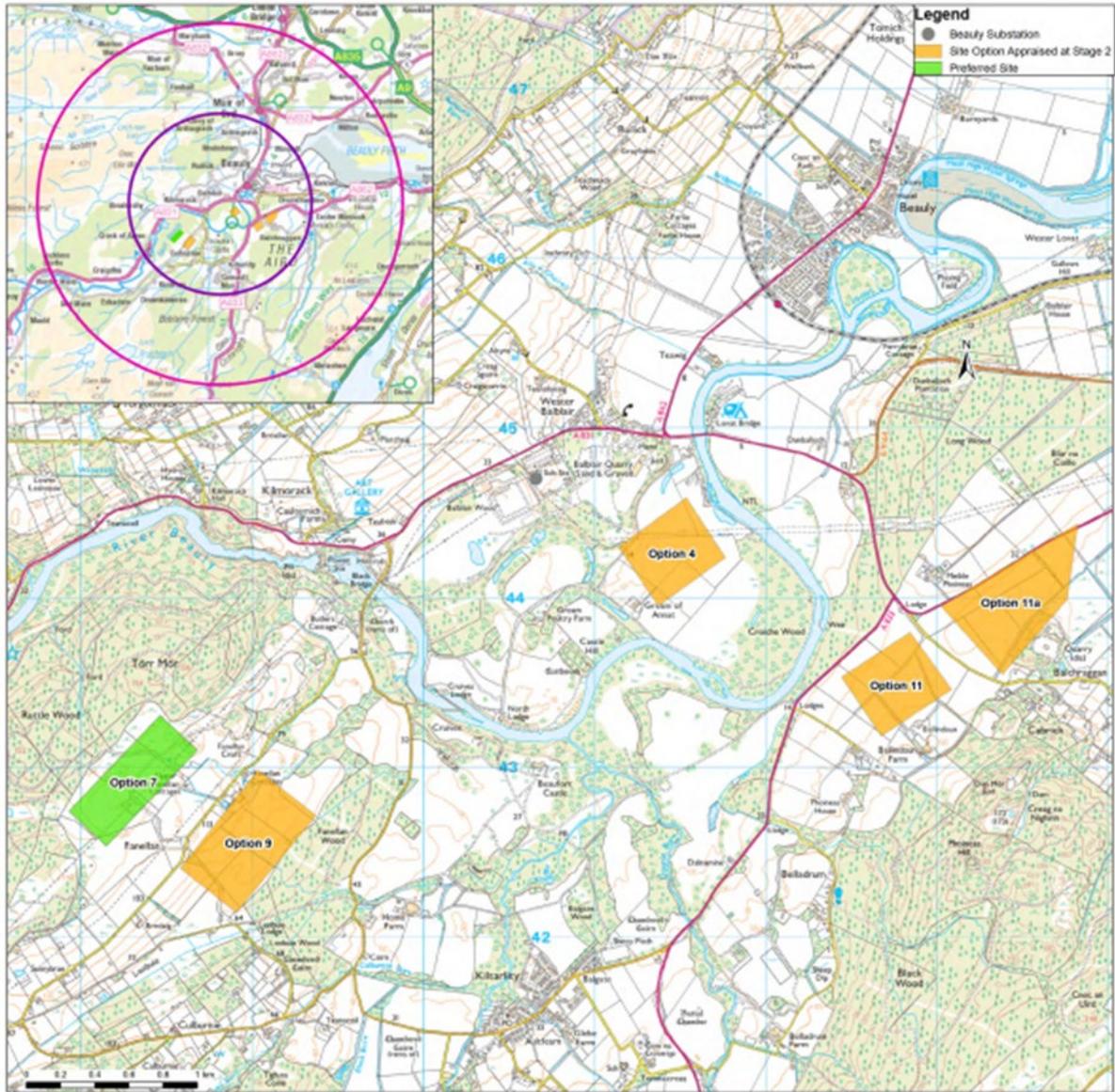


Figure 1 - Detailed Site Selection Options

## 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 20 February and was initially expected to end on the 31 March, however it was extended to 14 April 2023 due to requests from Stakeholders to allow more time to respond to the consultation.

Statutory Consultees were invited to provide feedback on our Consultation Document from the start of the feedback period and during the summer months. The feedback period for statutory consultees culminated in a formal Pre-Application meeting chaired by The Highland Council on 13 September 2023, after which time formal written feedback was received from the statutory bodies (HES and NatureScot on 6 October and The Highland Council incorporating SEPA and Transport Scotland responses, on 15 November 2023).

Where possible, landowners who were potentially affected by the proposals were contacted ahead of the consultation period opening to the public to discuss land related considerations or concerns.

### 2.3. The advertising process

The advertising process for the proposed Beaully substation/converter was incorporated into the advertising process for the Spittal – Loch Buidhe – Beaully 400kV overhead line. The consultation was advertised extensively using the following methods:

- The consultation events were advertised in the Press and Journal on 9 and 15 February, Caithness Courier on 8 and 15 February, Northern Times, Ross-Shire Journal and Inverness Courier on 10, 17 and 24 February
- 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 28,309 homes and 1,133 businesses within communities potentially impacted by our proposals for the Spittal – Loch Buidhe – Beaully 400kV project and relevant

substations, including the proposed Beaully substation/converter (see Appendix B: Public Consultation Event Poster)

## 2.4. Stakeholder participation

A series of consultation events were held between 20 February and 6 March for the Spittal – Loch Buidhe – Beaully 400kV overhead line, where local stakeholders could meet with the project team to discuss the proposals in more detail. The final event was held in Kilmorack Hall in Beaully, where the proposed Beaully substation/converter were of particular focus.

Date	Event	Recorded attendance
2 March	Beaully, Kilmorack Hall	214
6 March	Virtual Event	23

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.

A [virtual exhibition room](#) was accessible on the project webpage and a virtual event was held on 6 March 2023. The event was attended by 23 people with 78 questions being asked. Most questions received were in relation to the Spittal – Loch Buidhe – Beaully overhead line.

## Stakeholder meetings

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

Date	Meeting Type	Stakeholder group in attendance
7 February, 11 April, 13 June, 29 August	Beauly Community Liaison Group (CLG)	Local Community Councillors who sit on the CLG and Local Ward Councillor
15 February	Pre-consultation presentation meeting with Highland Council Ward Councillors (via Microsoft Teams)	Elected Highland Councillors from wards potentially impacted by our proposals
17 April	Ward 12 Highland Councillors In-Person Meeting	Ward 12 Highland Councillors
02 August	Round table with Beauly Stakeholders (convened by Kate Forbes MSP)	Kate Forbes MSP, Communities B4 Power Companies, Kiltarlity Community Council, Kirkhill and Bunchrew Community Council
13 September	Formal Pre-Application meeting with The Highland Council and Statutory Consultees to discuss the proposed development	The Highland Council (THC); NatureScot (NS); Historic Environment Scotland (HES); Scottish Environment Protection Agency (SEPA)

## 2.5. Feedback volume

Feedback from our stakeholders was welcomed via a range of methods. This included online or hard copy feedback forms, emails or letters, notes from the consultation events or stakeholder meetings or from any relevant telephone conversations.

### Responses to public consultation



### Responses from statutory and non-statutory consultees:

The Consultation Booklet and Storymap regarding proposed Beaully substation/converter was issued in advance of the consultation starting in February 2023. Since then, we have engaged with a total of 9 statutory consultees and 1 non-statutory consultee, inviting feedback on the preferences presented. A total of 6 responses were received, respectively, specifically in connection with the proposal. A summary of the responses received and our responses are summarised in Tables 3.3-3.6 below and in more detail in Appendix 1.

### Stakeholder representations

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.

## 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 proposed Beauly area 400kV substation and HVDC Converter project that has been identified through the consultation process and sets out our responses to the key points raised.

The feedback included in this section also makes reference, where appropriate, to the Common Themes and to the accompanying Frequently Asked Questions (FAQs) document, which can be found [here](#).

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 Option 7 (combined) as the preferred site. Our responses acknowledge this but also include feedback in relation to additional site options presented by The Highland Council, local Community Councils and members of the public during the initial consultation events, feedback period and through subsequent engagement between February and August 2023. The results of this work were included in the Consultation Document published in September 2023.

Feedback from the Statutory Consultees can be found in Appendix A, together with our responses. Where this feedback correlates with feedback from other stakeholders the relevant Statutory Consultee will also be noted in the 'Contributing Stakeholder Group'. Please note all comments from Statutory Consultees relating to the new OHL infrastructure projects (Beauly – Blackhillock – New Deer - Peterhead and Spittal – Loch Buidhe – Beauly) are captured in the relevant separate Reports on Consultation for those projects.

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

**Community Impact - Table 3.3**

Summary of feedback	Contributing Stakeholder Group	Our Response
Concerns were raised over visual impact on primary and tourist transport corridors such as the North Coast 500 (“NC 500”) and larger communities.	<ul style="list-style-type: none"> <li>Community members and local organisations</li> </ul>	<p>The nearest point on the NC500 is over 3km away and we do not anticipate a risk of adverse effects on it.</p> <p>The viewpoints to be used in the Landscape and Visual Impact Assessment (LVIA), included in the Environmental Impact Assessment (EIA) accompanying the planning application will be agreed with THC and we will undertake photography from agreed locations. The effects on the A831, which we know is used by tourists and visitors travelling from the Black Isle to Cannich and Glen Affric will be considered.</p> <p>Where landscape and visual impacts are identified the assessment forming part of the EIA will include mitigation proposals where achievable.</p>

<p>Concerns were raised over recreational impacts and the associated RAG scores. These included concerns about the area within and around Ruttle Wood. One respondent asked why the recreation RAG rating was assessed as Green for Site 7 (the preferred site) as this site would cut through the track used by a number of people and block access to Ruttle Wood. Further detail was requested on how this score had been assessed. It was also asked whether an alternative access path be made available.</p> <p>One respondent pointed out a locally recognised cycle route known as the ‘Beauly Firth Loop’ which lies between Site 11 and 11a. Other roads and fields in the area were noted as being used for recreational purposes by runners and horse riders.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>The private track for accessing Ruttle Wood from the unnamed road at Fanellan is not a public route (core path, hill track or Right of Way according to NatureScot’s map at this <a href="#">link</a> and ScotWays’ map at this <a href="#">link</a>) but we recognise that it does appear to be well-used from a review of satellite imagery and stakeholder feedback. Due to proximity there may be impacts from construction and we have therefore amended the RAG in the <a href="#">Site Selection Consultation</a> Document to Amber.</p> <p>We have noted the request for an alternative access path to Ruttle Wood. During construction access tracks may need to be closed to the public and diverted or realigned and this will be considered further as the project develops.</p> <p>While there are no national cycle routes within 100m of either of the sites, it is noted that the Beauly Firth Loop is a well-used cycle route that is located along the unnamed road (before joining the A862) that routes between Option 11 and Option 11a and therefore almost adjacent to this Option (within 100m). Due to this proximity, the recreation RAG rating for Option 11/11a has been upgraded to Amber as the proposed substations have the potential to interact with recreational amenity of this route, however, are not likely to compromise their recreational use.</p>
<p>Concerns were raised regarding potential noise impacts of the proposed new development (in particular, given the size of asset) and whether a survey would be carried out to assess impacts on properties within a certain radius (e.g. 5 miles). Further</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> <li>▪ <a href="#">The Highland Council</a></li> </ul>	<p>Operational and construction noise impacts will be assessed as part of the Environmental Impact Assessment (EIA) to ensure the site would operate within acceptable limits. This will form part of the planning application for the development to be submitted to The Highland Council. We will work closely with The Highland Council to take into account their feedback (see Appendix A).</p>

<p>detail on how we will mitigate the noise of the project was requested, with a suggestion that the use of GIS might mitigate against noise impacts vs the use of AIS.</p>		<p>Regarding the suggestion that GIS may reduce noise, this would not be the case since the main noise emitting equipment / plant for the substation will be located outdoors regardless of which technology is used. Site design and layout will aim to keep noise emitting plant further away from nearby properties where feasible.</p> <p>For The Highland Council’s comments on noise impacts please see their feedback in Appendix A.</p>
<p>Concerns were raised regarding potential light pollution from the Project site due to the preferred location being within a ‘dark skies’ area and concern that the site would be lit 24 hours a day. Stakeholders asked if light pollution from the proposed new development has been assessed.</p>	<ul style="list-style-type: none"> <li>▪ <b>Community members and local organisations</b></li> </ul>	<p>We will fully assess the requirements for construction and operational lighting as part of the Environmental Impact Assessment (EIA), which will be produced as part of the planning application. The EIA will include site specific recommendations to mitigate any impacts of lighting on nearby properties. We will produce a lighting strategy for the operation of the site as part of the planning application. Construction lighting will follow best practice to minimise light spillage. Our substations are not permanently floodlit but instead have motion sensor controlled security lighting, plus work lighting in case of urgent repairs during hours of darkness.</p>
<p>Concerns about landscape and visual impacts (relating to the size and scale of the development as well as the prominence on a hilltop for some site options) as a result of the proposed new development and potential effects to local communities were raised by several respondents. In particular, it was noted that the hillside locations (Option 7 and 9) will maximise number of people and size of area affected. One respondent indicated that they thought Option 4 seems like the most sensible location for the substation, landscape wise and proximity to Balblair as it can be well hidden and planted up around.</p>	<ul style="list-style-type: none"> <li>▪ <b>Community members and local organisations</b></li> <li>▪ <b>The Highland Council</b></li> </ul>	<p>As part of the consenting process, we will undertake an LVIA which will consider views from residential properties, sensitive receptors and key local viewpoints with the aim of designing the proposed Beauly substation to limit impacts to landscape character and visual receptors.</p> <p>We will seek to reduce visual impacts through site selection and design (aiming to reduce the platform level and building heights and installing hard and soft landscaping. Building colours will also be assessed and agreed through the planning process).</p> <p>We will work with The Highland Council, noting their feedback in Appendix A, to ensure appropriate viewpoints are captured within the assessment and relevant mitigation is put forward for their consideration, in the consent application.</p> <p>Whilst we recognise that Site Option 4, 11 and 11a may perform better for landscape and visual, there are other factors that make Option 4 less feasible overall than Option 7. For Option 4 one of the priority engineering considerations was flood risk, others including the site being constrained on 3 sides reducing available space for construction laydown and SuDS and existing 132kV and 275kV OHLs crossing the site.</p>

<p>One respondent was concerned about the stone used to construct dykes and field boundaries in the area of Option 7. The respondent noted that this stone is unique to this place and should be preserved. It was also asked whether SSEN Transmission would contribute to the upkeep of the dykes which it was stated form part of the character of the area.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>Local knowledge is appreciated in helping us to understand the unique features of the area. We seek to minimise impacts to the local built and natural environment wherever possible and practicable to do so and will review this as part of the design.</p>
<p>A number of respondents had feedback relating to the measures and features of design that will be taken to mitigate landscape and visual impacts of the proposed new development.</p> <p>Common suggestions from respondents were:</p> <ul style="list-style-type: none"> <li>• use exterior building materials and security fencing that blends in with the surrounding woodland and green fields;</li> <li>• dig into the hillside so that the proposed Beaully Substation and Converter Station is below the crest of the hill to reduce prominence;</li> <li>• vegetation screening to hide large structure;</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Community members and local organisations</a></li> <li>• <a href="#">The Highland Council</a></li> </ul>	<p>These comments have been noted and will be considered as part of the ongoing design for the site where appropriate. Taken individually:</p> <ul style="list-style-type: none"> <li>• The colour of the buildings will be designed to match the background when viewed from key locations as much as possible. This will be supported by the use of 3D models and has been done successfully on other sites, working with the local planning authority and key community representatives.</li> <li>• Undertaking Ground Investigation (GI) at the Site will allow the designers to identify a platform level that is as low as possible while balancing drainage and earthworks considerations, enabling surplus material to be used to create new organic landforms in front of key parts of the site. This work involves input from a specialist Landscape Architect.</li> <li>• Both the community and The Highland Council have requested we consider the use of GIS to help reduce the visual impact of the proposed site. GIS will only be taken forward for 400kV substations where specific site constraints dictate. Part of the assessment considered if there was a tangible reduction in site size if we used GIS technology, but due to the number of connections into the site and the requirement for a Gas Insulated Busbar (GIB) to transition the larger capacity 400kV connections, significant external infrastructure outwith the GIS building is required. We do not</li> </ul>

<ul style="list-style-type: none"> <li>• use GIS instead of AIS as this is perceived to require a much smaller footprint and a lower impact on the landscape and environment;</li> <li>• involvement of a landscape architect in the design;</li> <li>• reduce height of larger buildings where possible;</li> <li>• design buildings which are ‘fit to be seen in the landscape’; and house GIS switchgear substation inside a building.</li> </ul>		<p>believe that the reduction in platform size, combined with the requirement to install another sizeable building on the site to house the GIS equipment, will provide significant improvements in visual impact.</p>
<p>Concerns were raised regarding the risk of environmental contamination from construction and operation of the site which could lead to pollution in the watershed of the Beauly Firth.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>A Construction Environment Management Plan (CEMP) will be developed prior to starting construction and this will detail best practice and site-specific measures to mitigate the potential for contamination and pollution.</p> <p>A Sustainable Drainage System (SuDS) will also be designed and implemented in order to minimise the potential for impacts on surface water and groundwater during operation of the site.</p>
<p>Health and wellbeing concerns , including those to livestock, as a result of the proposed new development and potential impacts to local communities were raised. These included potential health risks from EMF and risks to mental health as a result of changes to residents’ ability to use and enjoy their properties and land. It was mentioned that the project was causing stress and anxiety for residents.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>Please refer to the accompanying <a href="#">FAQs</a> for information regarding health and EMF.</p>

<p>It was asked whether or not the drainage patterns on adjacent land would be affected by the proposed Development.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Landowners &amp; occupiers</a></li> </ul>	<p>A Flood Risk Assessment and Drainage Impact Assessment will be undertaken as part of the EIA and will assess any impacts of the site on local drainage, watercourses and flood risk within a relevant catchment area and identify any mitigations where necessary, including the implementation of the Sustainable Drainage Systems (SuDS) hierarchy.</p>
<p>Respondents asked if it was possible to see any visualisations of the proposed development's buildings in the proposed location to help demonstrate how it will look in the landscape.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>Visualisations of the proposed 400kV substation and HVDC converter from key viewpoints in the surrounding area will be included as part of the LVIA in the EIA report. A 3D model will be presented at the next public consultation events to demonstrate how the development may look and give people the opportunity to feed back their views. This will be a more refined model than that presented in March 2023. The planning application will be accompanied by photomontages taken from agreed viewpoints showing how the development would look.</p>
<p>Security concerns were raised with some respondents feeling the proposed development may be a potential high-risk target. Queries were raised about what site security measures are being taken in the event of any potential terrorist attacks on the site.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>The Department for Energy Security and Net Zero (DESNZ (formerly the Department for Business, Energy and Industrial Strategy (BEIS)) have been consulted regarding a security designation for the Site. Based on their response, the site security will be designed accordingly.</p>
<p>Concerns about property values were raised by respondents who felt that the project would potentially impact the value of their property. It was asked if SSEN would compensate them for any lost value.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Landowners &amp; occupiers</a></li> </ul>	<p>Please refer to the accompanying <a href="#">FAQs</a> for information on property.</p>

<p>Concerns regarding adequacy of road structures for access / possibility of needing upgrades to minor roads and an increase in construction traffic on safe cycling/walking routes including along Fanellan Road and between Kiltarlity and Beaully specifically via Kilmorack Dam were raised. It was suggested that having a separate access route, avoiding Fanellan Hill road, for construction and operation would be beneficial. The location of the access route for Option 7 was requested.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community, organisations &amp; officials</a></li> <li>▪ <a href="#">The Highland Council</a></li> </ul>	<p>Access to Option 7 (combined) for construction is a key consideration and the existing road infrastructure in the area will be assessed for its suitability for use for construction vehicles and abnormal deliveries. Where necessary, improvement or alternatives will be considered, and we will aim to keep disruption to other road users to a minimum as far as practicable. We have taken the suggestions regarding a separate access route on board and we are actively exploring this. We will consult nearby residents during this process.</p> <p>Access will be required over the Black Bridge. Currently our designers are undertaking an assessment of the bridge and will provide recommendations for any modifications or redesign options. We are liaising with The Highland Council during this process.</p> <p>The proposed access route will be presented at the next public consultation events in 2024.</p>
<p>Concerns were raised regarding potential disruption to neighbouring communities, in particular impacts during the construction phase and associated increase in traffic and noise due to construction.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> <li>▪ <a href="#">The Highland Council</a></li> </ul>	<p>The consultation materials presented a project timeline which outlined the likely construction timescales for the proposed development.</p> <p>As the design progresses, a more detailed understanding of the construction phasing and duration will be developed and will be considered as part of the EIA. The EIA will consider all potentially significant impacts to the local community arising from construction activities and will make recommendations to mitigate those impacts.</p>
<p>A respondent enquired if there are plans for SSE to further engage with Community Councils to help mitigate impacts of the proposal.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>We set up and organise the Beaully Community Liaison Group (CLG) which holds meetings generally on a quarterly basis in order to facilitate effective discussion with local Community Council representatives and ourselves on our activities and proposals in the Beaully area. Earlier this year, in response to the volume of additional development projects, the CLG representation increased to include Kirkhill and Bunchrew and Strathglass Community Councils. We hope to continue to engage with this forum on a regular basis regarding methods of mitigating impacts.</p>
<p>A question was raised over the site selection process and why Options 7 &amp; 9 and 4 &amp; 11 have been grouped</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community, organisations &amp; officials</a></li> </ul>	<p>When undertaking the site selection process, consideration was given to the footprint requirements of the proposed development and therefore space availability for potential sites was a key factor. We also considered splitting the HVDC converter station and</p>

<p>together for stage 2 of the site selection process.</p>		<p>substation across different sites as a comparison with a single site option to see if there were benefits from an environmental perspective with having two smaller and separate installations. Site options 4, 9 and 11 and 11a represented these smaller sites. However the benefits of a single site in providing improved electrical efficiencies, restricting visual impact to a smaller area and avoiding the impacts of a cable corridor connecting the two sites and longer diversion of the Beauly Denny OHL across the River Beauly, outweighed any potential benefits.</p>
<p>The siting of the preferred site was questioned, with a respondent noting that it is both the most elevated and the closest site to residential areas. It was asked how this has been considered.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Landowners &amp; occupiers</a></li> </ul>	<p>The elevation of the site was considered in the assessment of potential landscape and visual constraints and the location of residences were considered as receptor points for noise and visual disturbance. However, the proposed substation is one part of the wider development proposals in the Beauly area, providing a connection for the two proposed new 400kV OHLs and the Western Isles HVDC link. When considering all criteria (environmental, engineering, and cost), Option 7 (combined) performed the strongest as it significantly reduces the amount of new OHLs by enabling a relatively simple connection onto the existing Beauly Denny 400kV OHL.</p> <p>The form of the site does also offer the opportunity for mitigation measures, such as cutting into the hillside to lower the platform level and creating landscape bunds from surplus material from the site, to reduce the visual impact.</p>
<p>Concerns were raised that the Fanellan site (Option 7) was noted as being in an area of low population (and the respondent disagreed when taking into account the new OHLs that would connect in) and that the number of households in Balchraggan and Cabrich areas near Option 11/11a were underestimated. Option 11 and 11a were requested to be avoided due to recent significant housing development and anticipated further housing development by Highland Council. A respondent asked if housing</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> <li>▪ <a href="#">The Highland Council</a></li> </ul>	<p>We utilise OSAddressBase to ascertain information on residential developments in the area. We have consulted with The Highland Council on the proposed development and our site options, and their feedback can be found in Appendix A. We have reviewed our site options against known planning applications and the local development plan, and we will continue to engage with The Highland Council to ensure all considerations/requirements are addressed as part of the next stages. We will aim to minimise the number of current and planned properties impacted by our proposals as much as is practicable through site selection. Impacts on properties in the vicinity of our preferred site will be minimised through noise and visual mitigation as part of the design.</p>

<p>plans with Highland Council were considered as part of the site selection process. Generally, The Highland Council noted that care should be taken to identify sensitive receptor locations, especially dwellinghouses and to assess the effects of proposals in that regard.</p>		
<p>Maps used in your consultations are outdated and don't show my property.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>It was brought to our attention during the public events that the illustrative Ordnance Survey base maps underpinning our plans were out of date. The Ordnance Survey base maps utilised were from early 2022. Ordnance Survey update their maps on an ongoing basis, but only issue new versions of the map tiles once there are several changes within a map tile extent. Therefore, although some areas (e.g. new housing) may have been there for several years, Ordnance Survey may not yet have issued an updated version of the map tile showing this. We therefore have no control over the accuracy of the base maps and will ensure that the most recent version is used together with a caveat on future materials to explain this.</p> <p>The Site assessment work used OSAddressBase data which presents details of all properties held by Ordnance Survey at the time but there is always the potential for 'missing' properties due to delays in the data being made available as explained above. Additional properties have been added to our internal residential property dataset which has been used for site selection work.</p> <p>We'd like to take this opportunity to assure that these Ordnance Survey base maps did not inform project options assessments.</p>
<p>One respondent stated that the maps presented during consultation were unclear and that the community were confused and concerned about the proposals.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>Following feedback from the public events, we have committed to the Community Liaison Group (CLG) which is comprised of 5 community councils, that for future events we will;</p> <ul style="list-style-type: none"> <li>▪ be explicit in explaining the need for the project;</li> <li>▪ make use of a larger venue with disabled access/parking;</li> <li>▪ align consultation events where possible with the other projects being developed by us, and which interface at Beaully to show the `big` picture;</li> </ul>

		<ul style="list-style-type: none"> <li>▪ provide larger clearer maps and visual information;</li> <li>▪ use clear terminology and to implement an extended feedback period beyond 4 weeks</li> </ul>
One respondent was concerned about potential for future expansion / future connections into the substation/converter station and wanted assurance that if Option 7 was chosen now that Option 9 would not be used in the future.	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	A key requirement for assessment was that sites being considered had additional space for future expansion. This would seek to limit the need for future substation infrastructure at new locations if we can select sites that are able to accommodate future connections. As noted in our common themes section on ‘project need’, under our licence, we have a legal obligation to provide connections to electricity generators looking to connect to our network. Any future connection requirements would be subject to our routeing selection process and stakeholders, including the local community, would be consulted.
One respondent wanted consideration of a location for the substation in the area of Loch nam Bonnach/ Farley Woods, with a suggestion that cables could then be undergrounded in the same corridor as the proposed Western Isles HVDC cable into Beaully Substation/Beaully Denny line.	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>We have not assessed this site directly however Option 14 and the ‘West of Broallan’ site are in close proximity and share similar characteristics. Option 14 and West of Broallan were discounted because they did not perform better than Option 7. This is primarily because:</p> <ul style="list-style-type: none"> <li>• the site is located further from the existing Beaully- Denny 400kV OHL, so a more significant diversion would be required.</li> <li>• the connection to the new Beaully- Blackhillock- New Deer-Peterhead 400kV OHL would be more complex.</li> <li>• The development would bring the presence of infrastructure to an area where there is currently none and this would likely compromise the sense of remoteness and lack of human artefact which is a key characteristic of the LCT. Location and topography of site would make it technically challenging to construct.</li> <li>• Scheduled ancient monuments are located in close proximity</li> </ul> <p>Please see the common themes section, titled ‘technology choice’ in relation to the constraints of undergrounding.</p>
Respondents noted that the location of the proposed Beaully substation impacts the route for the OHL coming into the substation including the Beaully – Blackhillock – New Deer –	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	The proposed Beaully – Blackhillock – New Deer – Peterhead OHL was progressed at an earlier date than Spittal – Loch Buidhe -Beaully and as such held consultation separately due to it being at a further advanced stage. The proposed Spittal – Loch Buidhe – Beaully OHL was consulted on with the proposed Beaully substation.

<p>Peterhead OHL scheme and asked why the Spittal – Loch Buidhe – Beaully OHL and Beaully – Blackhillock – New Deer – Peterhead OHL schemes have been split into two projects and consulted on separately? Respondents wanted to know more information on where the OHL tie ins would be for the proposed substation and that routes for the OHL were feasible to connect into the substation preferred option (Option 7 combined).</p>		<p>However, the two new OHLs: Spittal – Loch Buidhe – Beaully OHL and Beaully – Blackhillock – New Deer – Peterhead OHL have undergone routing selection exercises in parallel for the connection into the proposed Beaully substation/converter and have provided the opportunity for the communities to feed back during consultation (for Beaully – Blackhillock – New Deer – Peterhead OHL these were separate consultation events).</p> <p>Reports on Consultation for these projects have been published in parallel with this report. In addition, going forward at the next public consultation events in 2024, the consultation for the proposed Beaully substation will include information on the tie-in routes from both the new Spittal – Loch Buidhe – Beaully OHL and the new Beaully – Blackhillock – New Deer – Peterhead OHL.</p>
<p>A number of respondents had queries about the site selection process and did not agree with the location, how different sites were chosen and how they were assessed. There was concern that other possible locations had not been considered.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>Please refer to our <a href="#">FAQs</a> for information on our approach to optioneering.</p>
<p>Some respondents felt there was a lack of openness and honest information provided and wanted to know why the public were not consulted on the site selection process earlier, when the stage 1 locations were assessed. One respondent wanted to know why land owners had already been approached regarding land purchase.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>Our responses within the <a href="#">FAQ</a> explain our approach to public consultation and how stakeholder views are considered.</p> <p>We approach landowners as part of our site selection process to ensure they are aware we are potentially considering their land and to understand their position on the proposals. Whilst the willingness to sell land is not a consideration for our site selection, engagement with landowners is a useful way for us to gather additional information on constraints on potential sites through their local knowledge.</p>
<p>Several respondents commented that the consultation material and events were inadequate for reasons such as:</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>Our ‘Consultation’ section of our Common Themes outlines how we will be directly actioning some changes to the consultation process in response to feedback.</p>

<ul style="list-style-type: none"> <li>▪ reliance on people attending in person;</li> <li>▪ lack of access to information for those who do not have internet access or transport;</li> <li>▪ insufficient number of consultation booklets available;</li> <li>▪ no postal information;</li> <li>▪ events too busy; and</li> </ul> <p>variation between answers</p>		<p>In regards the Beaulay area specific feedback, we acknowledge that the choice of venue impacted on the event and subsequently took this feedback on board in regard to our Beaulay – Peterhead consultations held the following month, ensuring Phipps Hall in Beaulay was utilised as a more publicly accessible and larger location. We also increased the quantities of booklets produced to ensure a sufficient amount was available.</p>
<p>Several respondents noted the Highlands’ value and viewed the proposals as having disregard for the land, people, wildlife and way of life. Respondents wanted to know why electricity generation and associated transmission was focussed in Scotland but that electricity would be exported south to England.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>Please see our common themes section for information on project need, environmental impact and socio-economic impact together with our <a href="#">FAQs</a> for queries relating to the location of electricity generation.</p>

#### Environmental Impact – Table 3.4

Summary of feedback	Contributing Stakeholder Group	Our Response
<p>It was requested that the definition of Landscape Character be provided.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>According to NatureScot, Landscape Character is created by the way the physical components come together and can be defined as "a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another" <sup>1</sup>.</p>

<sup>1</sup> <https://www.nature.scot/professional-advice/landscape/landscape-character-assessment>

<p>Queries were raised regarding cultural heritage RAG scores. In particular, one respondent highlighted the following:</p> <ul style="list-style-type: none"> <li>• Dun Mor fort scheduled monument is located in an elevated position overlooking Option 11/11a.</li> <li>• Option 11 is on the route of the old road from Beaufort (and before that the Stockford of Ross) to Inverness and cuts through the ancient fields identified as 'Lackeyloch' and 'Lackeywran'.</li> </ul> <p>Another respondent disagreed with the opinion that O 7 and 9 won't impact the GDL as it can still be seen from these sites.</p>	<ul style="list-style-type: none"> <li>▪ <b>Community members and local organisations</b></li> </ul>	<p>In response to feedback, the cultural heritage designation RAG rating in the <a href="#">Site Selection Consultation Document</a> has been upgraded to a Red RAG for Option 11/11a, 4/11 and 7/9 without mitigation. This reflects the increased potential for adverse setting impacts due to their proximity to the Scheduled Monuments (and not the GDL as views are insular) as highlighted through consultation with HES which also recognised Dun Mor fort in relation to Option 9, 11 and 11a (see Appendix A). These options are the least preferred from a designation's perspective (Option 7 (combined) being the preferred from a heritage designations perspective). However, with additional screening these potential effects can be reduced, thus reducing the RAG Rating to an Amber overall.</p> <p>The other assets identified are non-designated assets (old road and ancient fields) that do not have the same legal protection surrounding them as designated assets. We would seek sympathetic design to ensure protection where possible, and mitigation (for example, written scheme of investigations (WSI) and an archaeological watching brief to be approved with The Highland Council), will be employed in advance and/or during construction to ensure the reduction from significant adverse impacts.</p>
<p>Queries were raised regarding potential impacts on wildlife and habitats. Concerns in relation to ancient woodland, pine martins, nesting birds, badgers, lap wings, merlin, sparrow hawks, hen harriers, buzzards, red kites, peregrine falcons, osprey, honey buzzards, goshawk, owl, deer, hares, bats, foxes, red squirrels, Ruttie Wood were noted. It was asked what SSEN is doing to mitigate impacts and protect wildlife and the local environment. One responder also noted that there are Schedule 1 bird breeding sites in the area and asked will /have we</p>	<ul style="list-style-type: none"> <li>▪ <b>Community members and local organisations</b></li> </ul>	<p>We have undertaken a number of ecological desktop studies and field visits to inform site selection and will undertake detailed, seasonally focussed surveys of relevant protected species and additional habitat surveys to inform the Environmental Impact Assessment (EIA) which will be required to support the application for consent to The Highland Council. The project team is in contact with the appropriate regulatory bodies and is committed to ensuring that works adhere to applicable UK and Scottish regulations for the respective environmental disciplines, as well as industry best practices.</p> <p>We are very aware of the raptors nesting and foraging in the vicinity of Option 7 (combined) from Beaully-Denny and subsequent projects. We have a Bird Protection Plan agreed with NatureScot which seeks to avoid disturbance impacts on these birds. This would be implemented in full with the help of specialist advice through our environmental consultants, RSPB and local Raptor Study Groups. This data is likely to be sufficient to inform assessment of the proposed Beaully substation/converter. If there are any gaps in coverage,</p>

consulted with British Trust for Ornithology regarding these known nest sites.		we will carry out further consultation with organisations that hold relevant ornithological data. An ornithological impact assessment will be completed as part of the EIA process.
Respondents noted some concerns over protected species impacts and the associated RAG scores. One respondent asked why Option 7 was allocated an Amber RAG rating for protected species compared to Option 4 and 11 which was allocated a Red RAG rating? Have the similar comparative surveys been carried out in both areas?	<ul style="list-style-type: none"> <li>Community members and local organisations</li> </ul>	The protected species rating for Option 4/11 was rated higher than Option 7 as the habitats available for protected species within the vicinity of Option 4 are more constrained. There is a protected species' habitat at Option 4, on the north-west side of the River Beaully, which is considered likely to be separate to the identified protected species at Options 7 (and 11). Should development at Option 4 proceed, it has the potential to negatively affect the population of the protected species there, by reducing their habitat in an already potentially restricted territory (due to the location of the quarry/industrial areas to the north and the River Beaully to the east). Whilst in comparison, should development proceed at Option 7, it is considered any potential adverse impact on the protected species would be reduced, due to the greater availability of suitable habitats in the wider surrounding area.
A question was asked regarding why Option 11/11a was ruled out due to it being on prime farmland. The respondent wanted to know if a greater value was applied to farm land compared to wild forest land.	<ul style="list-style-type: none"> <li>Community members and local organisations</li> </ul>	Land use, and the presence of agricultural land is one of the criteria considered. All Site Options were located in whole or part in some form of agricultural land. Option 11/11a comprises land classified as Class 3.1 agricultural land. Therefore, this Site Option includes high-quality agricultural land classification (Class 1, 2 and 3.1). Option 7 (combined) does not include high-quality agricultural land classification (Class 1, 2 and 3.1) and is therefore the preferred in comparison to Option 11/11a in relation to agricultural land use. The presence of natural woodland is evaluated separately. The RAG assessment is not intended to compare one environmental component to another nor is a greater value placed on one category of land over another. We strive to fairly evaluate each site individually and select sites across all components on balance.
A respondent asked to what degree does housing density vs wildlife considerations (AONB, breeding birds, other species) vs historically important sites influence the choice of preferred site.	<ul style="list-style-type: none"> <li>Community members and local organisations</li> </ul>	All of these aspects are considered when evaluating a site, therefore it is not the case of one versus another and a weight is not applied to any individual criteria. Each of the factors mentioned are evaluated individually for each site by qualified professionals in that discipline.
Comments noted that Belladrum Estate is under immediate consideration by Historic Environment	<ul style="list-style-type: none"> <li>Community members and local organisations</li> </ul>	We have been in consultation with Historic Environment Scotland (see Appendix A for their feedback) and we will seek further information on the consideration of the Belladrum Estate in the Register of Designed Landscapes.

Scotland to be included in the Register of Designed Landscapes for Scotland and included in the West Loch Ness Farm Cluster.		
A respondent from Beaully Fishery Board mentioned that the need for biodiversity net gain creates an opportunity for funding for various potential local projects and once some of these have been more formalised on our side they hope to be involved in the development of projects. E.g. riparian tree planting.	<ul style="list-style-type: none"> <li>Non-Statutory (Beaully Fishery Board)</li> </ul>	We welcome further discussions with Beaully Fishery Board regarding potential local projects. Where practicable, opportunities for funding local projects such as compensatory riparian tree planting will be reviewed.
A respondent from Beaully Fishery Board stated that the least preferable options for the proposed Beaully substation are Option 4 due to proximity to the river and angling activities, and Option 11A due to proximity to restored wetland habitat at Cabrich which is a good project that has involved co-operation from numerous landowners/ farmers.	<ul style="list-style-type: none"> <li>Non-Statutory (Beaully Fishery Board)</li> </ul>	Both Option 4 and Site 11a have been assessed during the Stage 2 Detailed Site Selection process which included consideration for both recreation and natural heritage. When considering all the engineering and environmental criteria together, Option 7 (combined) was identified as the overarching Preferred Site Option.

### Economic Impact – Table 3.5

Summary of feedback	Contributing Stakeholder Group	Our Response
Concerns were raised regarding the potential wildlife, landscape and visual impacts of the project will have	<ul style="list-style-type: none"> <li>Community members and local organisations</li> </ul>	Please see our response in the Common Themes section ‘Socio-Economic Impact’ for further information. In addition, engagement with local landowners and business owners is welcomed and will continue throughout the development stages of the project.

<p>a negative impact on tourism and local businesses.</p> <p>One responder noted that the Highlands in particular relies on tourism for a large percentage of its income and the Proposed Development could mean the area is perceived as a less desirable place to visit and stay. As a result, the Beaulieu area is being disproportionately affected by the proposed Beaulieu substation.</p>		
<p>A respondent mentioned that they felt that no information had been provided on potential community benefits. More information on any social/community benefits was requested.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>Please see our response in the Common Themes section ‘Socio-Economic Impact’ and our <a href="#">FAQs</a>, for further information.</p>
<p>Some respondents felt that cost should not be considered in the proposals as it would be to the detriment of the landscape, heritage, wildlife etc.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>Please see our response in the Common Themes section ‘Technology’.</p>

Technology Impact – Table 3.6

Summary of feedback	Contributing Stakeholder Group	Our Response
<p>Why hasn't SSEN Transmission considered the use of brownfield sites for the substation for example the existing quarry sites near the existing Beaully Substation or an extension to the existing Beaully Substation? One respondent suggested using the quarry site in conjunction with option 4 or 3 to provide more space.</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>Potential Site Options near to the existing quarry at Balblair were not originally considered due to the operational nature of the Quarry, space restrictions, cumulative impacts with the existing Beaully substation and proximity to the settlement of Wester Balblair. However, in response to this feedback an additional four sites (Quarry A, B, C, D) located in close proximity to the existing Beaully substation, potentially making use of the existing quarry and extension of the existing Beaully Substation have been considered, together with a site at West Broallan.</p> <p>These have been assessed and taken through the Selection process and compared against the best performing Option 7 (combined). Following the completion of the Stage 1 initial screening process, one quarry option (Quarry A) was identified and taken forward to Stage 2 as it was determined to be a technically feasible, economically viable and environmentally acceptable site option. The Quarry A site cannot accommodate both the 400kV substation and HVDC converter station designs as a combined site, due to size constraints of the site. Therefore it was paired with either Option 7 or Option 4.</p> <p>Option 3 was previously discounted at Stage 1 initial screening as not being suitable to take forward to Stage 2 detailed site selection so was not considered further as a suitable pairing with Quarry A.</p> <p>Following evaluation of the additional options, Option 7 remains the preferred choice. <a href="#">The Site Selection Consultation Document</a> outlines the findings and reasons for why the additional sites did not perform better than Option 7.</p>
<p>How is the UGC associated with the proposed Beaully substation going to be constructed and how will it cross the River Beaully and Black bridge?</p>	<ul style="list-style-type: none"> <li>▪ <a href="#">Community members and local organisations</a></li> </ul>	<p>Cable installation methods will be developed with our appointed Contractors following further design and assessment of items including ground conditions and topography in the area.</p>

<p>Respondents wanted to know the reason why subsea cabling could not be used in place of onshore transmission infrastructure (removing the need for the Beaully Substation), particularly as it is used for some transmission projects and not others.</p>	<ul style="list-style-type: none"> <li>Community members and local organisations</li> </ul>	<p>Please see our response in the common theme section on ‘technology’ and in our <a href="#">FAQs</a>.</p>
<p>Respondents wanted more information on the OHL that would connect the substation at Option 7 to the existing Balblair substation. Another respondent wanted information on proposed heights of new towers (pylons) and whether any existing towers would be removed. Others wanted information on any expansion in capacity required to the Beaully Denny OHL.</p>	<ul style="list-style-type: none"> <li>Community members and local organisations</li> </ul>	<p>Option 7 has the advantage of being adjacent to the existing Beaully-Denny 400kV OHL meaning only a small diversion of the OHL will be required to connect the new substation to the network. Once design for the OHL diversion is produced we will be able to provide information on the heights and locations of towers implemented as part of this diversion project, and whether any existing towers will be removed. The existing Beaully-Denny OHL has two circuits and was built to accommodate a 400kV capacity on both, but one circuit is currently operating at 275kV. This means that there will be some work required to upgrade equipment at the existing Beaully substation to enable 400kV operation on both circuits.</p>

## 4. Summary of Key Decisions

The key decision taken, following the consultation process for site selection and our review of stakeholder (statutory and non- statutory) feedback, is to progress Option 7 (combined) as the Proposed Option for the Substation and Converter Station.

Option 7 (combined) was the preferred site for consultation following an assessment of environmental, engineering and cost criteria. However, feedback from the consultation process recommended that we consider alternative sites in the site selection process, which included a site near West of Broallan and four sites in close proximity to the existing quarry at Balblair. This culminated in a review of potential options.

These sites were assessed using the same site selection process as that used previously, however, it was found that none of these options performed better than Option 7 (combined). The main challenges with each of these additional options were engineering and constructability, connection to the existing Beauly- Denny 400kV OHL, limited space for ancillary works such as temporary compounds and landscaping, proximity to residential properties and thus noise, flood risk and proximity to cultural heritage.

The Highland Council has specifically requested for us to consider the option, whereby the HVDC converter station is located at Quarry A and the substation at Option 7. We completed a full assessment of this option, however there are clear technical and environmental justifications for why this option is not suitable. All additional site options scored less favourably than Option 7.

We now plan to further develop the Option 7 (combined) option as part of our Planning Application due for submission next year. We will review and implement, where feasible, The Highland Council's recommendations which are to reduce land take, look at lowering the platform level, consider the use of GIS and involve a landscape architect to ensure that the design integrates with the existing landform during the design development phase of Option 7. Please see Figure 2 for reference.

**Legend**

- Beauly Substation
- Proposed Site

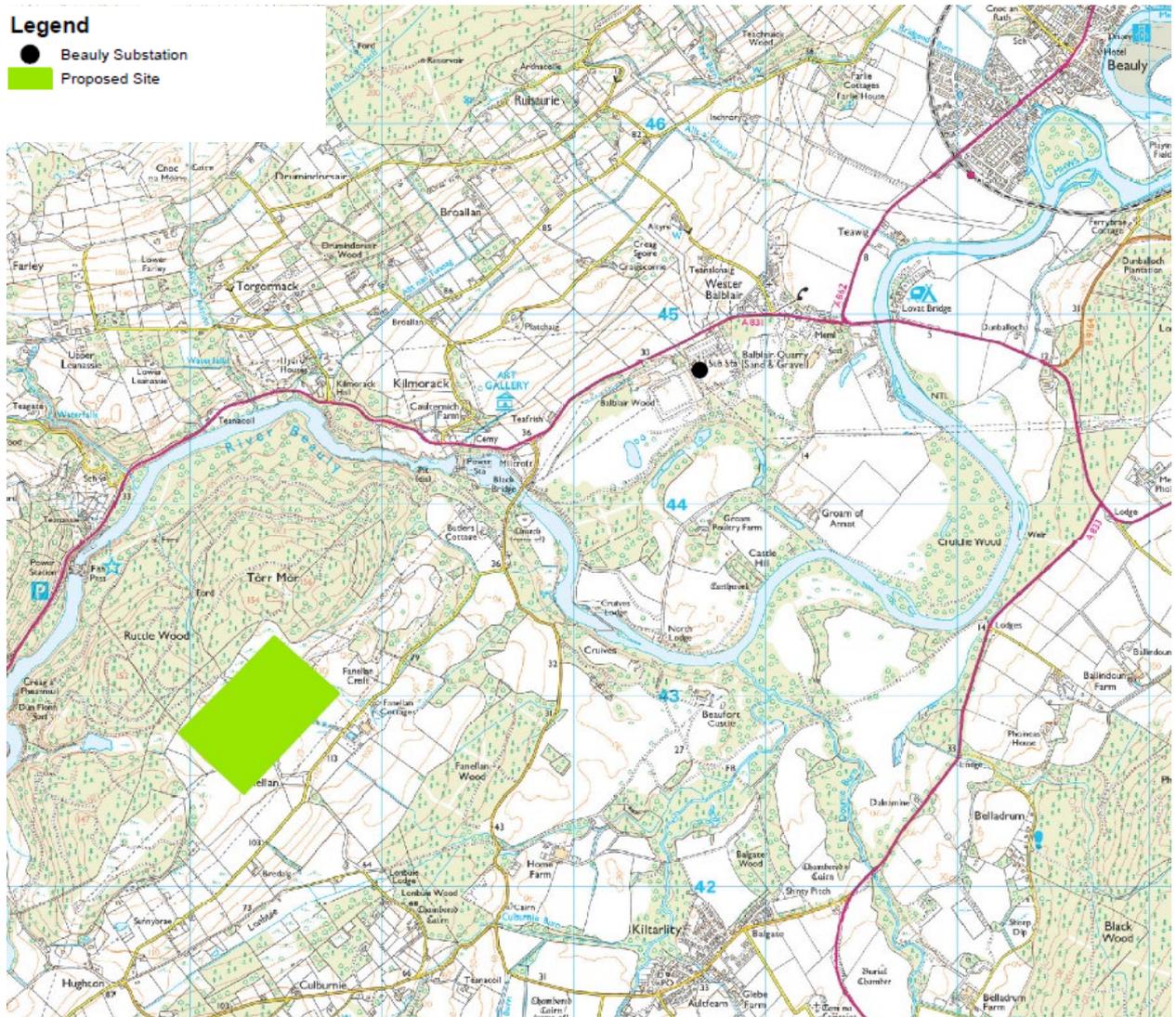


Figure 2 – Beauly Area Proposed 400kV Substation and HVDC Converter Station Site

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

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

Our next steps involve requesting an EIA Screening Opinion from the Scottish Government’s Energy Consents Unit for the OHL diversion and tie-in of the existing Beauly- Denny 400kV OHL. This opinion will advise whether an Environmental Impact Assessment (EIA) needs to be prepared and submitted with the application for consent under Section 37 of the Electricity Act 1989.

Thereafter, a request for an EIA Scoping Opinion will be made to The Highland Council and an EIA Scoping Report will be prepared and submitted to support this 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 application for planning consent.

In Spring 2024, we will hold our first formal Pre-Application Consultation (PAC) event, following the statutory requirements of the planning process<sup>2</sup>. As part of this PAC process, we will present the rationale for the selection of the proposed site, and present indicative information on the likely extent, layout and appearance of the proposed Beauly substation/converter 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.

We will continue to consult with the affected Community Councils via our established Beauly Community Liaison Group (CLG) and The Highland Council, in addition to other stakeholders.

## 5.2. Feedback

If you have any further views at this stage, then please get in touch with us at [slbb@sse.com](mailto:slbb@sse.com).

Or write to us at:

SSEN Transmission

10 Henderson Road

Inverness

IV1 1SN

Further Information about the project is available on the project webpage:

[www.ssen-transmission.co.uk/projects/project-map/new-beauly-area-400kv-substation/](http://www.ssen-transmission.co.uk/projects/project-map/new-beauly-area-400kv-substation/)

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<sup>2</sup> The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (As Amended)

## 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. Appendices

### Appendix A – Statutory Consultee Feedback

Summary of feedback	Our Response
<p><b>Historic Environment Scotland</b></p> <p>Feedback from Historic Environment Scotland (HES) stated that they understand that the proposals for the new substation and converter station has considered options which include separate, but relatively close, sites for the substation and the converter station but also options which would combine the two stations into one larger but relatively more contained solution to reduce the spread of infrastructure required.</p> <p>It was noted that from 16 potential sites originally considered the options have now been reduced to 4 sites with an additional quarry site recently also considered.</p> <p>There are a number of designated historic environment assets within our remit in the vicinity of the substation Site Options:</p> <ul style="list-style-type: none"><li>• Kiltarlity Parish Church (SM5570)</li><li>• Corff House, fort SW of (SM3195)</li><li>• Culburnie, ring cairn and stone circle (SM2425)</li><li>• Belladrum, Chambered Cairns 250m NNE Of Brockie's Lodge (SM2435)</li><li>• Dun Mor, fort, Ballindoun (SM2423)</li><li>• Phoineas Hill, enclosure 900m ESE of Phoineas House (SM4729)</li><li>• Dun Garbhaig, fort, Kilmorack (SM2422)</li><li>• Beaufort Castle (GDL00052)Beaufort Castle (LB8068)</li></ul>	<p>Noted. We will ensure these designated historic environment assets are included in all assessments.</p>

HES provided feedback stating that at this stage it appears likely that a new substation could potentially be located at Option 7 without raising issues of national interest for their 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. HES also noted that the cumulative impacts of the proposed option along with the required overhead line infrastructure should be considered when more detailed assessment is undertaken.

HES's feedback is noted and support for Option 7 (combined) out of the four options is acknowledged. We will assess the cumulative impacts of the proposed Beauly substation/converter with required overhead line infrastructure.

HES provided feedback on Scheduled monuments in relation to Option 7 stating that they feel this option is the least likely to have significant impacts on the settings of nearby scheduled monuments. Option 7 as a combined option would see the proposed substation situated on the plateau at Fanellan, a site which is surrounded by native woodland of Ruttle Wood to the northwest and the Fanellan Wood to the east. It was noted that visual impacts may be experienced from Corff House while other sites (Dun Garbhaig fort, Kiltarlity Parish Church) were stated to be unlikely to experience visual impacts due to flat nature of the plateau at Option 7. Dun Fort, Phoinias Hill and Culburnie, ring cairn and stone circle were all believed to be adequately screened by woodland and unlikely to experience visual impacts. The reduction of structure height was suggested as a means to reducing impacts on scheduled monuments.

Support for Option 7 (combined) out of the four options is acknowledged. Further work will be carried out by our independent heritage and landscape and visual professionals to consider potential impacts on the historic environment (including visibility from key points) will continue throughout the design process and subsequent EIA, so as to mitigate adverse effects on designated assets where possible. All assessment will be supported by site visits and visualisations and advice will be sought from HES and The Highland Council to ensure that assessments comprehensively address their requirements.

Further assessment of the impacts identified should be undertaken if this option is to be taken forward, ideally through ZTV and targeted visualisations. We would be happy to advise further on visualisation points. This will allow for a more detailed assessment of the scale of impacts to be provided.

HES provided feedback on the Inventory Gardens & Designed Landscapes and category A listed buildings in relation to Option 7 noting that it is located west of the Beaufort Castle Inventory Garden and Designed Landscape some 1.9km to the west of Beaufort Castle. The substation may be visible from the Castle and parkland which forms the core of the designed landscape around the Castle, however, much of the

Effects on the historic environment will be considered through the EIA process by our independent heritage professionals and any potential impacts reduced through the iterative design process and appropriate mitigation.

perimeter of the estate is enclosed by mature estate woodland, which may limit any visibility. Although there is potential for impacts on both the setting of the Castle and its designed landscape, we think they are unlikely to raise issues of national interest. It may be possible to reduce any significant impacts by design.

HES commented that they had reviewed all of the other site options and noted that 12 of the original 16 options considered were discounted at an early stage for a variety of non-heritage reasons. HES stated that they are content that none of these discounted options would provide a preferable site in comparison to Option 7 for their remit. HES are therefore satisfied that options 7, 9, 11 and 11a have been given more detailed consideration at this stage.

Options 9, 11 and 11a sit in open plains to the south, southeast and east of Beaulieu and would be clearly visible, albeit at a low level, from nearby scheduled monuments around Beaulieu, in particular Corff House, fort SW of (SM3195), Dun Mor, fort, Ballindoun (SM2423) and Phoinias Hill, enclosure 900m ESE of Phoinias House (SM4729). The proposed development in these locations would dislocate the scheduled monuments from their relationship to the land around the river Beaulieu. While HES have not considered these options in depth, given the level of information currently available, it is likely that all of these substation options and in particular any connecting OHLs would have significant adverse impacts on the setting of these scheduled monuments.

HES note that Quarry B, C, D and the West of Broallan site have been discounted, with the assessment of Quarry C and that West of Broallan noting the presence of scheduled monuments within 50m as key constraints. HES agree with the initial assessment that the potential adverse impacts on the setting of these scheduled monuments would likely be significant and may raise issues of national interest for their remit.

Quarry A would be situated as an extension of the existing Balblair Wood quarry to the immediate north of the River Beaulieu. While the principle of quarrying is established in this location, any extension of the Balblair Wood quarry site which

We recognise the potential for significant impacts on cultural heritage at Option 9, 11 and 11a and that Option 7 (combined) is the preferred option under HES' remit. Independent heritage professionals have been involved in assessment to date and will continue to be involved in the subsequent EIA process.

Noted, thank you for highlighting the scheduled ancient monument- Kiltarlity Parish Church. The Quarry A Site (as part of a combined option with Option 4 or Option 7) does not perform better than Option 7 (combined) and therefore will not be progressed further.

might be required would bring development closer to the scheduled area across the river at Kiltarlity Parish Church (SM5570), potentially within 300m of the scheduled area.

Views from Kiltarlity Parish Church (SM5570) to the north are currently screened from the existing quarry by a shelterbelt of trees on the immediate north bank of the River Beaully, and the proposals for the establishment of the Quarry A site would retain a small shelterbelt. Should this option be taken forward HES would support the retention of this shelterbelt which provides an important function in screening and focussing the sight line north from the scheduled area to local views of the river and its banks. Should the current tree screening be removed to open up this view to the quarry and HVDC site it would have a significant impact upon the setting of the scheduled monument, such that it would likely raise issues of national interest and objections would be raised.

Provided this screening can be delivered/ensured HES stated that they would be content that Quarry A would not result in significant impacts on the monument's setting. HES also noted that currently the assessment for the site at Quarry A appears to have only considered the category B listed building at Kiltarlity (LB8081) and does not appear to have considered the scheduled monument identified above.

HES noted that in addition to the potential impacts from the combined substation and converter station or the individual station sites, it will be vital to consider the potential cumulative impacts from the associated overhead lines due to connect into the sites.

HES note that all of the proposed route options to all of the Beaully substation options potentially raise concerns over significant adverse impacts to the setting of designated assets.

This includes assets to the north on the Beaully to Loch Buidhe section of the OHL route which passes in close proximity to a cluster of likely Iron Age forts including Dun Fhamhair (SM5212), Dun a Chliabhain (SM2424), Dun a Garbhlaich (SM2422) and Dun

Noted. The EIA Report will include an assessment of potential cumulative impacts, including cumulative impacts on cultural heritage assets, with other developments, including other consented or proposed OHL infrastructure in proximity to the proposed Beaully substation. The cumulative assessment will also include the other elements associated with the proposed Beaully substation/converter such as associated overhead lines due to connect. Separate EIAs will be undertaken for the proposed 400kV OHL projects (Beaully – Blackhillock – New Deer – Peterhead and Spittal – Loch Buidhe – Beaully).

Mor (SM4979) to the northwest of Beaully, and with the proposed Beaully-Blackhillock-New Deer-Peterhead OHL route which passes in close proximity to another cluster of likely Iron Age forts including Dun Mor, fort, Ballindoun (SM2423), Phoinneas Hill, enclosure 900m ESE of Phoinneas House (SM4729) and Castle Spynie, broch (SM4653) to the southeast of Beaully. The Beaully-Blackhillock-New Deer-Peterhead also has the potential to impact on the setting of the Beaufort Castle GDL and associated listed buildings.

Should the proposed development proceed, HES advised that visualisations, such as wireframes and photomontages are used to help assess the impact of the proposed scheme on the setting of key cultural heritage receptors, with identification of such receptors aided in part by the production of a detailed ZTV.

HES stated that they would welcome further consultation as the proposals progress to develop a better understanding of the detail of potential impacts, particularly cumulative impacts and any potential mitigation for those impacts.

### NatureScot

A response from NatureScot noted that the Preferred Site Option will have no direct or indirect impacts to non-breeding birds, or SSSI habitats at the following locations:

- Cromarty Firth SPA / Ramsar Site / SSSI
- Inner Moray Firth SPA / Ramsar Site
- Beaully Firth SSSI

The proposed substation and converter station lies approximately 10km from the Glen Affric to Strathconon SPA. There are unlikely to be any direct or indirect impacts to breeding golden eagle as a result of this proposal. However, osprey associated with the Cromarty Firth SPA, and Inner Moray Firth SPA, are known to nest in the wider area including at Aigas Gorge, which lies in close proximity to the proposed substation and converter station at Kinellan. There is a high potential for disturbance to osprey

Our independent heritage consultants will undertake the assessment of setting impacts on a case by case basis following Historic Environment Scotland's 'Managing Change Guidance' on Setting. All assessment will be supported by site visits, visualisations and ZTV's in collaboration with our independent landscape and visual specialists.

Ongoing consultation with HES and The Highland Council will be maintained.

We will prepare information to support Habitat Regulations Assessment (HRA) as part of the consenting process which will consider impacts to Osprey during construction among other relevant considerations. We welcome the opportunity to consult with NatureScot on this further during the consenting process.

during construction, especially if works are to take place within the osprey breeding season (February to September). Survey data will be crucial to determine likely effects to osprey breeding in the wider area and inform species mitigation plans that may mean working outwith the breeding season if it is not possible to avoid disturbance.

NatureScot recognised that the proposal falls within the National Planning Framework (NPF4) list of national developments. However, where construction and operation of the substation is unable to avoid direct or indirect effects on protected areas, NatureScot are likely to object if these effects will adversely affect their integrity and cannot be mitigated satisfactorily.

Noted.

NatureScot requested that where protected areas are affected that site specific plans detailing all aspects of construction, operation and maintenance and the mitigation needed to avoid adverse effects are produced and submitted with relevant applications. NatureScot welcome ongoing liaison with your consultants regarding effects on protected areas and the surveys required to assess them.

The response also noted that the competent authority will require sufficient details about all aspects of the Proposed Development and how it will be carried out in order to complete their habitats regulations appraisal (HRA). NatureScot are happy to continue engagement with us on the gathering and production of information to inform the HRA. NatureScot's response also provided reference to standing advice and guidance to be referred to and stated their intention to defer any comments on landscape impacts to the Highland council.

NatureScot's guidance is noted. We will prepare information to support an HRA and EIA Report as part of the consenting process and welcome the opportunity to consult with NatureScot on this further during the consenting process.

NatureScot provided advice and reference to a guidance document on peatlands, carbon rich soils and priority peatland habitats<sup>3</sup>. This guidance document aligns with the National Planning Framework 4 (NPF4) policies which are relevant to development proposals on peatland, carbon-rich soils and priority peatland and sets out the information that must be provided with the application and Environmental Impact Assessment Report (EIAR) to enable assessment of effects.

NatureScot's guidance is noted. The opportunity to consult with NatureScot on this further during the consenting process is welcomed. We will prepare the application and EIA through ongoing liaison with NatureScot and in line with the guidance document provided to ensure adequate mitigation is incorporated, where required.

<sup>3</sup> <https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management>

An assessment framework based on guidelines for the selection of SSSI for bogs in a template form was provided. NatureScot requested that the template be completed and submitted with the application to help assess whether the proposal could have a significant effect that NatureScot will consider as raising issues of national interest. It was also noted that where the development infrastructure (including a 250 m buffer) meets the criteria in the template, an additional map should be provided showing its locations in relation to the development.

The response also noted that protecting peatland habitats and restoring them is likely to be a significant part of this project and as such NatureScot would welcome early and ongoing liaison to ensure impacts on good quality habitats can be avoided and minimised through iterative design.

NatureScot highlighted requirements for developments to deliver positive effects, primarily under Policy 3 of the NPF4 and referenced guidance to support local biodiversity development applications<sup>4</sup>. Aspects of this guidance could be useful to this project to inform how to take account of biodiversity in development, including ensuring future management and monitoring maintains the biodiversity enhancements in the long term.

The response also noted that opportunities for biodiversity enhancement should be explored and identified as early as possible, including through discussion with key stakeholders. Information on predicted losses, proposed compensation and delivery of additional positive effects should be clearly summarised within the EIA report. The information must be sufficient to allow the consenting authority and relevant stakeholders to see clearly how effects will be addressed, and compensation and enhancement delivered.

### **The Highland Council**

A response from The Highland Council (THC) provided pre-application advice on the proposed site option, including site environmental constraints mapping. THC noted

NatureScot's advice and guidance is noted. We will consider BNG opportunities as the project progresses. See Common Themes 'Environmental' Section.

THC's pre-application advice will be taken into account during the EIA Stage of the Project. A Scoping request will be sent to the Council prior to producing the EIA to ensure that all relevant

<sup>4</sup> <https://www.nature.scot/doc/developing-nature-guidance>

that they are supportive of renewable energy developments in principle, including the necessary grid connections. The need for the development is well established, with this national development looking to deliver a vital part of NPF4's National Spatial Strategy. THC highlighted that it is however a substantial, complex project, noting that, land take requirements of the proposed development will be substantially larger than the existing collective substations at Beaully and the size and scale of the connecting lines being larger than any others located within this part of Highland. As such it will take considerable time to consider, and will require extensive ongoing collaboration, in order to be consented and delivered on a phased basis. The key concerns at present relate to minimising the effects on surrounding landscape, visual amenity and on the affected communities; the size of this project; the lack of potential suitable sites which are well screened or at a lower elevation to accommodate the height and scale of buildings proposed; the extent of overhead line cabling proposed; the limited separation from residential receptors; and the resultant impacts on the receiving environment.

THC requested that all undergrounding options are fully considered for the initial stretches of the connecting transmission lines which cross through, or in the vicinity of, the more densely populated areas both to the north and east of the proposed new substation and converter station. Should this not be possible for the 400kV lines, scope to rationalise or underground other transmission lines in the vicinity must be explored to help mitigate the likely widespread cumulative impacts of this proposal.

THC highlighted their concerns with the potential landscape and visual impacts associated the preferred single site (Option 7 Combined) approach. Officers are keen that transmission infrastructure remains contained wherever possible. As such THC encourages SSEN Transmission to be considered in full the split site option, with the substation at Option 7 and HVDC converter station at Quarry A (west of the existing Beaully substation) until there is clear robust technical and/or environmental justification for resorting to siting the HVDC buildings elsewhere.

THC noted that if Quarry A is used for the HDVC converter station it is essential that it does not add to the existing noise levels of the existing Beaully Substation which are only borderline acceptable in the Balblair village area. Whilst the ongoing noise impacts associated with the existing Beaully substation are rightly a concern and a

assessments that the Council require to better understand the impacts of the project, are captured.

We will seek to reduce the impact of the development on the landscape as far as practicable. During our design process we will consider options such as: split level site between the HVDC site and Substation; lowering the platform height in its entirety, building height reduction of the HVDC buildings, cladding colour of buildings, landscaping and planting, OHL tower locations (Beaully-Denny OHL diversion) and site entrance landscaping.

This feedback relates to the new OHLs that will connect into the new Substation. Please see the separate Reports on Consultation produced for those projects (Beaully – Blackhillock – New Deer – Peterhead OHL and Spittal – Loch Buidhe - Beaully OHL,

Noted. The quarry site has been evaluated and is not a suitable site for development of a standalone HVDC Converter Station if the point of connection remained at the original preferred Option 7 – Fanellan site. Option 7 remains more favourable on balance.

development constraint, Option 7 and Quarry A has advantages providing that environmental impacts can be mitigated and surrounding perimeter woodland can be retained, limiting Beaufort Castle setting impacts.

THC's key concerns at present relate to minimising the effects on surrounding landscape, visual amenity and on the affected communities. As such should the preferred site Option be developed, THC:

- encourages the reduction in the extent of land take required, with developing a sloping site resulting in significant ground engineering works to form a developable platform, with extensive areas also being required for adequate SUDS provision, access and landscaping;
- suggests further consideration to be given to the use of Gas Insulated Switchgear (GIS), lowering the site through cut and fill, having a landscape architect involved in designing the formation levels to work with the existing contours; and notes larger buildings should be reduced in height wherever possible, and care should also be taken to design buildings which are fit to be seen in the landscape, particularly if their profile will be sky-lining in any key views or from transportation routes.

THC recommended further discussion through the Council's design workshop service, with Zone of Theoretical Visibility mapping, wireframes, visualisations / photomontages available for the proposed development, so as more targeted feedback on landscape and visual impact matters can be provided by THC's Landscape Officer.

THC response noted that while SEPA, NatureScot and Historic Environment Scotland (HES) are broadly supportive of SSEN's site preferences, further detailed information will be required moving forward to confirm the optimal overall project design.

The Highland Council feedback will be taken into consideration during the design stage.

The Highland Council have requested we consider the use of GIS to help reduce the visual impact of the proposed site. GIS will only be taken forward for 400kV substations where specific site constraints dictate.. Part of the assessment considered if there was a tangible reduction in site size if we used GIS technology, but due to the number of connections into the site and the requirement for a Gas Insulated Busbar (GIB) to transition the larger capacity 400kV connections, significant external infrastructure outwith the GIS building is required. We do not believe that the likely reduction in platform size, combined with the requirement to install another sizeable building on the site to house the GIS equipment, will provide significant improvements in visual impact.

We would welcome the opportunity to consult with THC's landscape officer throughout the design phase. We will utilise the services of independent chartered landscape architects to develop the design and complete a robust landscape and visual impact assessment.

Noted. Consultation with stakeholders will be maintained as the design progresses. And more detailed information provided in future consultation events.

THC's summary concludes:

'Providing that the concerns of the Council as outlined within this response, communities, and other key consultees are satisfactorily addressed, the Council would be able to support the project. At this stage, this remains uncertain with several outstanding matters still to be addressed and more detail expected to be shared with the Council ahead of confirming final site selection, routing options, technological solutions, design, woodland creation, and other habitat enhancement measures which are expected to be detailed in full at the time of application submission.'

THC advised that the following consent(s) will be required for the proposed development:

- Planning Permission for the substation, converter station and ancillary development
- Section 37 consent for the overhead line connections and Prior notification for the underground lines

THC made reference to relevant planning policy comprising: NPF4, HwLDP, IMFLDP and relevant supplementary guidance that the proposal will need to consider and meet and set out a wide range of supporting technical studies that will be required including:

- Abnormal Load Assessment
- Access Management Plan
- Arboricultural Impact Assessment
- Archaeological Site Investigations
- Assessment of Impact on Historic Environment
- Aviation Impact Assessment
- Compensatory Planting Plan
- Construction Noise Assessment
- Construction Traffic Management Plan
- Contaminated Land Report

The responses in this Report on Consultation explain the justification for our additional site Option assessments demonstrated that there is technical and environmental justification why the HVDC Converter station cannot be located at the Quarry site. A comprehensive Environmental Impact Assessment will be undertaken and submitted with the planning application. We look forward to further engaging with The Highland Council throughout the design stage.

Noted. We are proceeding with the assumption that these will be required.

We will seek guidance throughout the EIA process, including seeking a formal Scoping Opinion from the Council, to ensure that all relevant assessments that the Council require to better understand the impacts of the project, are captured and utilise the relevant guidance as required. It should be noted that the Scoping process may refine the list presented here.

- Design and Access Statement
- Drainage Impact Assessment
- Dust Survey
- Flood Risk Assessment
- GWDTE Assessment
- Habitat Management Plan
- Landscape and Visual Impact
- Landscape Maintenance/Management Plan
- Landscape Plan
- Operational Noise Assessment
- Peat Management Plan
- Planning Statement
- Pre-Application Consultation Report
- Private Water Supplies
- Protected Habitat Survey
- Protected Species Survey
- Schedule of Mitigation
- Sustainable Design Statement
- Swept Path Analysis
- Transport Assessment
- Tree Constraints Plan
- Tree Protection Plan
- Visualisations and 3D Flythrough

THC also noted that it is envisaged that the application be subject to Environmental Impact Assessment which covers the scope of works required for the Beaulieu substation and converter station, the associated overhead and underground lines, and all other associated infrastructure which form an integral part of 'the project'.

THC envisages that community wealth building will be integral aspect to this proposal and the challenge remains to demonstrate how socio-economic benefit would be maximised to achieve a just transition for the affected communities.

We share this sentiment and we will work with THC, the community councils and the public on this.

Please see our response in the common theme 'Socio-Economic Impact' section.

**Natural Heritage and Landscape:**

A submission should be accompanied by a Landscape and Visual Impact Assessment (LVIA), within which consideration of sensitive receptors will need to include those who reside in the area (including residential amenity assessment) and those who visit it, with receptor locations particularly including areas of settlement, transport routes, and visitor and recreational attractions and routes. In addition, the proposal must have regard to the citations for Special Landscape Areas (SLAs) that summarise key characteristics, qualities, sensitivities, and measures for enhancement. Sufficient details on how the Proposed Development will be constructed, operated and maintained are required to inform the HRA.

THC highlighted that the five shortlisted site options are each within landscape character type 'Enclosed Farmland' or within landscape character type 'Farmed River Plains'. Landscape character areas here are relatively narrow however and sometimes backdropped by other landscape character types close by.

Further detail comments with regards to landscape and visual impact, protected areas, ornithology, peatlands and carbon-rich soils and HRA are provided by NatureScot (see comments from NatureScot earlier in this report)

A comprehensive Landscape and Visual Impact Assessment will be conducted as part of the EIA. This assessment will be completed by independent Chartered Landscape Architects and will be complemented by site visits and photomontages. The landscape team will liaise with THC staff during this process and consider and integrate their feedback.

THC provided guidance on what the design and access statement should outline, explain and describe, and referenced documents to provide further advice on the preparation of design statements.

We will utilise this information in the preparation of design statements.

THC highlighted the constraint of Policy 6 of the National Planning Framework 4 and Policy 52 of the HwLDP which both make reference to the Scottish Government policy on the Control of Woodland Removal aiming to minimise the permanent loss of woodland associated with a change in land use. Where a permanent removal of woodland occurs, compensatory planting will be required to help mitigate for this loss of habitat. Details of compensatory planting must be provided in support of any planning submission. This must identify a suitable area of land which has been

All applicable policies will be consulted and adhered to in all forestry works.

assessed by Scottish Forestry under the Forestry EIA screening process. Compensatory planting proposals must then be developed in consultation with Scottish Forestry and any other relevant stakeholders to demonstrate that it is a viable scheme.

Compensatory planting must be of at least the equivalent area to that which is being removed and, in some cases, an enhanced area of compensatory planting will be required. It should also be noted that compensatory planting should be of a similar woodland type (commercial/native) to the one being removed. Any off-site compensatory planting will need to be secured through a legal agreement between the Council, the applicant and landowner(s). Where woodland removal or restructuring affects an area under an approved Long Term Forest Plan (LTFP), then this will need to be amended to account for any approved changes. It is important that any related operations are integrated, such as woodland restructuring, biodiversity enhancement, compensatory planting, Habitat Management Plans and Long-Term Forest Plans.

Amenity:

Contaminated Land

THC stated that there is potentially a slight overlap of the Option 11A location with Balchraggan Quarry, which may have been subject to infilling and the history of this quarry should be checked prior to construction of infrastructure in the vicinity. Option 9 is in the vicinity of a former works building, and historic activities within this area should be given further consideration prior to development. There are no known potential contaminated land issues at any other substation site Option locations.

Noise

As part of the submission THC require a detailed noise assessment to be undertaken by a competent person. If the split site (Option 7 and Quarry A) is taken forward as the proposed site the noise assessment would need to consider the accumulative noise from the existing Balblair substation and the proposed new HDVC converter station. THC provided advice and guidance on what should be included within the noise assessment. Consideration should be given to the likelihood of future development at the site when determining suitable mitigation measures and design

Comment acknowledged. Option 11a or Option 9 are not our preferred site.

Background noise monitoring will be undertaken to understand the noise baseline. A detailed noise assessment will then be completed, by an independent and qualified noise assessment specialist, as part of the EIA. The noise assessment will give consideration to relevant noise sources and sensitive receptors in the vicinity of the site and evaluate impacts to these receptors. Where necessary, recommendations for appropriate

of the Proposed Development. It is critical mitigation measures are incorporated into design. THC stated that Option 7 is located less than 200 m from residential properties. The site is a rural location, and it is anticipated that it will have a low existing ambient noise level. The noise emissions from substations are known to be tonal and are incongruous to the existing rural noise environment. The substation noise would contrast with the natural ambient sounds which would normally occur in this location. Such that even at low levels the noise from the proposed substation could adversely impact on local residents.

THC also expect that the noise assessment will include an assessment of both the proposed new substation/ HVDC convertor station and any modifications/alterations to the existing Balblair substation.

SSEN Transmission should contact the Environmental Health Service directly if they wish to clarify any of the advice and details with regards to construction Noise impact further or wish to discuss in more detail the operational noise assessment criteria.

THC provided a response regarding construction impacts. As the proposed development will include significant construction works over several years and will be undertaken in close proximity to noise sensitive properties, there is potential for significant disturbance from construction noise. As such it is essential that the community liaison group is maintained throughout the duration of the project, to keep residents informed of the progress of the project and allow for complaints to be addressed fairly and expeditiously.

THC noted that a construction noise assessment will need to be submitted and carried out by a competent person, in accordance with BS 5228-1:2009 “Code of practice for noise and vibration control on construction and open sites – Part 1: Noise”. It is expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. Attention should be given to construction traffic and the use of tonal reversing alarms.

As the proposed development is in close proximity to houses, a scheme for the suppression of dust during construction works including from traffic movements is required to be submitted.

noise mitigation to be implemented to reduce noise impact will be made.

As noted above, a comprehensive suite of impact assessments will be completed and appropriate mitigation will be recommended that includes consideration of “nuisance” factors such as reverse alarms on vehicles. Other mitigation and management plans, such as our Construction Environmental Management Plan and Traffic Management Plan will provide commitments for areas such as dust suppression and traffic management.

We intend to maintain the Beaulieu CLG through the development, design and delivery phase which will ensure the community are kept abreast of developments as the project progresses.

### **Private Water Supplies**

An investigation to identify any private water supplies (PWS) will need to be carried out, including pipework, which may be adversely affected by the development and details of the measures proposed to prevent contamination or physical disruption will be required as part of submission.

General services checks will be conducted to ascertain the location and type of services present on the site, including private water supply pipework. Where this is found to be present, details of measures to protect such pipework and private water supplies will be provided in the relevant management plan(s).

THC provided a number of comments on Transport and Wider Access

### **Impact on the Local Road Network**

The preferred site Option 7 is located off the C1106 Fanellan Road that takes access from the A831. The A831 is a consultation route for forestry extraction and therefore not entirely suitable to accommodate significant numbers of large heavy goods vehicles without appropriate improvement / mitigation. Any application submitted should include an assessment of the A831's capability to accommodate the predicted vehicle movements deemed necessary for both the construction and ongoing operation of the proposed new facilities. This should also include any abnormal load movements deemed necessary to transport large plant or equipment to and from the chosen site. To be clear, the proposed routing of construction traffic to and from this site should not propose large heavy construction vehicles travelling south on the A831 towards Cannich.

The C1106 Fanellan Road is not a suitable route for significant numbers of large heavy goods vehicles. Therefore, significant improvements to the sections impacted will be required for both construction and ongoing operational needs. This should include needs for ongoing future expansions and the replacement / upgrading of large heavy equipment within the site during its operational life. Any submission will need to clearly set out what improvements to the C1106 Fanellan Road will be undertaken, with justifications why they should be deemed suitable and sufficient for the anticipated construction and ongoing operational needs. Such road improvements should aim to comply with the requirements from our published Roads and Transport Guidelines for New Developments. It should be noted that we will not accept any

We have engaged a specialist engineering consultant to review the local road network to determine the suitability of public roads and thus any public road improvements required to deliver the project. This includes a route analysis of the delivery routes of any abnormal loads and construction traffic. We will also undertake a structural assessment of the Black Bridge to determine suitability to carry construction traffic and abnormal loads. The assessment will include recommendations for any works required to the bridge to enable it to carry the required loads.

This information will be used to help develop the traffic and transportation impact assessment. All studies will comply with the necessary requirements and follow all applicable guidelines as necessary.

construction or ongoing operational access along the C1106 Fanellan Road from the south towards Cannich.

When reviewing requirements for the C1106 Fanellan Road, the bridge over the River Beaully will also need to be included in those considerations. The existing structure is currently operating with restricted movements across it for both vehicle containment purposes and due to its loading capacity. Therefore, improvements / replacement of this bridge will be required to support construction and ongoing operational access needs of the preferred site Option 7 going forward. Also, the structure is currently not designated to support loadings from abnormal vehicles.

**Construction Traffic Management Plan (CTMP)**

THC advised that any submission should include a Framework Construction Traffic Management Plan (CTMP) that sets out the management measures that will be implemented to assist with safely managing the routing of construction-related traffic to and from the finalised development site and help to limit impacts on the public road network. Such management measures will be in addition to any physical improvements deemed necessary. The Framework CTMP should clarify the proposed routing of construction traffic and set out what steps will be taken to ensure all construction traffic adheres to that routing.

It should be noted that no abnormal load movements will be accepted across the existing Lovat Bridge carrying the A862 over the River Beaully without detailed inspections and assessments being undertaken and the findings accepted by our Structures Team. It's our understanding that such inspections will need to include diving surveys of the existing bridge piers and foundations within the river.

The Framework CTMP should also set out any management measures that will be implemented to avoid generating unacceptable construction traffic during sensitive times on the existing local public roads (e.g. during school opening and closing times or large events in the area such as Belladrum). Also, any anticipated measures that will restrict or prevent free use of the local public road network during the works should also be clarified (e.g. temporary traffic lights, road closures, speed limits etc).

A Construction Traffic Management Plan will be prepared in advance of construction works. It will detail the works and associated traffic. It will outline measures to control traffic to ensure no disruption and safety issues. It will also include consideration of the operation of heavy vehicles and best practices for their operation (e.g. loading and unloading restrictions, hours of operation etc). The CTMP will be developed with consideration given to community activities, local features, traffic patterns and will consider input from THC and community members.

Your comments regards Lovat Bridge are noted and will be taken into consideration.

The assessment of the need for physical road mitigation and/or traffic management measures should include both routes required to access the finalised new substation and converter station, plus any roads impacted by creating the necessary connections to the existing Beaulieu Substation and the proposed changes to distribution networks.

Highland Council as the Local Roads Authority will not accept plant or materials being loaded or unloaded on the local public road network. Suitable facilities off the public road should be provided to permit the loading, unloading and storage of plant and materials.

THC advised that they will not accept construction traffic parking on local public roads during the works. Suitable facilities should be provided for all construction traffic to park off the road.

Any submission should confirm commitment to enter into a formal 'wear and tear' agreement with Highland Council as the Local Roads Authority, as set out in Section 96 of the Roads (Scotland) Act 1984. This should include a commitment to survey the proposed access routes prior to works commencing, ideally with a Local Area Roads representative, if available, and then again at the end of the works. Also, the Framework CTMP should set out how the routes will be inspected during the works to determine if there has been any damage that warrants immediate repair, or any mud or other construction-related materials deposited on it that warrants being removed. Depending on the anticipated scale of impact on the local public road network, it may be necessary for The Council to seek a Road Bond or other financial security to protect the Authority from any extraordinary expenses if required to step in and make-good any issues with the local public roads impacted.

#### **CTMP Mitigation**

Mitigation required may include new or improved infrastructure, road safety measures and traffic management arrangements.

All works on the public local road network will require the approval of the Council as Roads Authority through a Road Construction Consent together with any necessary

We will consider this information when developing our CTMP. Where relevant, our Environmental Impact Assessment will include any necessary mitigation measures.

Technical Approval for structures. Therefore, detailed and dimensioned plans showing the mitigation proposals on and adjacent to the public road will be required to be agreed prior to any works commencing on site.

Early consultation with the Council's Structures Section is recommended with regard to affected Council maintained structures on the routes to the site.

Design details for the proposed vehicular access(es) into the site(s) should be included in any submission. These details should justify that the layouts will be capable of safely accommodating the vehicle movements needing to use them, both during their construction and ongoing operation. The design details and construction forms of any accesses should adhere with the requirements from our published Roads and Transport Guidelines for New Developments.

The accesses should also demonstrate that adequate visibility can be achieved in both directions along the public roads impacted. For all permanent accesses, these should be measured from a 4.5m setback behind the edge of the existing surfaced carriageway of the public road. In most situations, a 2.4m setback should be sufficient for temporary accesses. However, this will be dependent on the nature of the road they connect with and the traffic using them, plus the intended purpose and duration of those proposed temporary accesses. For example, temporary accesses from roads with fast moving traffic that are due to be in-place for a considerable period are likely to benefit from 4.5m visibility splay setbacks.

The required visibility distances will be dependent on the current general traffic speeds along the sections of road impacted. We recommend that traffic surveys are undertaken in the vicinity of the proposed accesses to quantify the current volumes and speeds (85th %'ile) of traffic. This can then be used to determine appropriate visibility splays, using Table 5.5 from our published Roads and Transport Guidelines for New Developments.

Any submission should justify that the Promoter either has full control of all the land needed to achieve the required visibility splays, or that they have agreements with the neighbouring landowners impacted. Such agreements should demonstrate that any neighbouring landowners impacted give permission for the visibility splays to run through their land and that they commit to not implementing any construction, planting or landscaping that could impact on the achievement of those required visibility splays going forward.

#### Access Design

The designs for the accesses will need to demonstrate that they will prevent surface water from the development sites running out onto the local public road. Also, any existing roadside ditches impacted by the proposed access works will need to be catered for within the designs. This could involve culverting below the new accesses or diverting any ditches to avoid them.

The new vehicular accesses should be surfaced with a suitably bound bituminous material for at least the first 6m from the edge of the existing carriageway of the local public road. Also, any gates should be set sufficiently back so that the vehicles needing access during the operation of these facilities can fully leave the carriageway of the public road before reaching the gates.

The internal layout of the sites will need to demonstrate that suitable facilities will be provided so that any traffic accessing them, either during the construction or their ongoing operation, will be able to turn safely. This is to ensure that there should not be any need for vehicles to either reverse into or out of the sites from the public road. We could not support such manoeuvres from a road safety perspective.

Similarly, the internal layouts will also need to clarify what the levels of operational parking provision will be within them. Any submission should justify why those levels will be required and why they should be deemed sufficient for the ongoing operation of these facilities.

We will consider this in the next stage of the design.

### **Access Officer**

An access management plan should be submitted with any application. It should be informed by an assessment of the development's impact on public access which should be delivered as part of an EIA.

It should incorporate everything from access rights to water, general access rights, parts of the wider path network, core paths, public rights of way and other routes. Simply referring to core paths and routes in Scottish Hill Tracks is inadequate.

Impacts during and after construction should be assessed with the priority being accommodating public access during construction and maximising the potential benefits.

All accommodation gates, fences and tracks should accommodate public access with pass gaps or gates; a point that should be stressed with land managers from the outset.

A number of comments were received from THC regarding Water Environment.

### **Flood Risk**

THC noted that several of the suggested sites for the substation and HVDC converter are near the River Beaulieu, or other significant watercourses or areas of drained land. Flood risk may be a key issue with some of these sites. A Flood Risk Assessment (FRA) written by a suitably qualified and experienced engineer, in accordance with the Supplementary Guidance will be required to show that the facility will remain operational up to a 200 year +CC storm event. There should be no increase in flood risk to others. The remaining advice applies to the substation site and cable routing, as appropriate.

Development or land raising within any flood plain should be avoided and proposals should generally follow SEPA's Standing Advice for Flood Risk. SEPA's Technical Flood Risk Guidance for Stakeholders outlines the information required to be submitted as part of a Flood Risk Assessment.

We will develop an access management plan and will include the aspects mentioned here.

A FRA will be developed by an independent engineer as part of the Design and EIA phase. We appreciate the provision of this guidance which will assist in preparing this assessment.

Small watercourse crossings should be oversized and larger scale watercourse crossings should be demonstrated to be adequately designed to accommodate the 1 in 200 year flow (including an allowance for climate change and freeboard) to avoid increasing the risk of flooding, or information provided to justify smaller structures.

A suitable riparian buffer should be kept free from development from the top of bank(s) of any watercourse or waterbody. Storage of materials within this area during construction is not permitted. Culverting for land gain will not be acceptable.

THC provided links to SEPA's best practice guidance and guidance on the design of water crossings.

### **Drainage**

A Drainage Impact Assessment (DIA) for the development is required. The DIA should include details relating to any existing field drains and the management of surface water drainage, which should be designed in line with general Sustainable Drainage Systems (SuDS) principles. The Applicant should demonstrate, within the proposals submitted, any mitigation measures to manage the residual risk of overland flow /pluvial flooding.

Appropriate drainage is required to restrict runoff to pre-development rates and to minimise erosion to existing watercourses. Natural flood management techniques should also be applied to reduce the rate of runoff where possible.

The DIA should ensure that post development runoff rate is no greater than pre-development runoff rate (i.e. greenfield runoff) for all return periods up to the 1 in 200 year +CC storm event.

Runoff from all events up to and including the 1 in 200 year plus climate change event should be managed within the site boundary, with no flooding to critical roads or buildings, and evidence as to how this will be achieved should be included within the DIA.

A DIA will be developed by an independent engineer as part of the design and Environmental Impact Assessment phase. We appreciate the provision of this guidance which will assist us in preparing this assessment.

Natural flood management techniques should also be applied to reduce the rate of runoff where possible. Tracks should not act as preferential pathways for runoff and efforts should be made to retain the existing drainage network.

Refer to the Council’s Flood Risk and Drainage Impact: Supplementary Guidance for further detailed requirements.

**Existing or Proposed Groundwater Abstractions**

Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:

- A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA is likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.

THC recommended referring to Guidance on ‘Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems’ for further advice on the minimum information SEPA requires to be submitted.

**Historic Environment**

THC’s Historic Environment Team have not provided any specific comment on any of the pre-application proposals and are expected to engage at the EIA Scoping stage.

We appreciate the guidance and information here and will utilise this information in the development of the design and EIA.

We welcome engagement with The Highland Council and Historic Environment Team as the proposal progresses.

### **Developer Contributions**

THC advised that the Council's Developer Contributions Supplementary Guidance will be used in the determination of planning application and requires all development, including single house developments, make proportionate financial developer contributions towards meeting service and infrastructure needs in areas of Highland where clear deficiencies are identified.

It was added that under the terms of HwLDP Policy 31 Developer Contributions and the Council's Developer Contributions Supplementary Guidance (2018), industrial (including energy) developments may be required to make contributions towards transport; green infrastructure; water and waste; public art. A link was provided for further information.

THC provided information on Pre-Application Procedures. This included the following:

#### **Proposal of Application Notice**

A formal Proposal of Application should be submitted to the Planning Authority at least 12 weeks prior to any formal planning application being lodged and any subsequent planning application must be accompanied by a Pre-application Community Consultation Report. A link was provided to the Proposal of Application Notice section of the Council website.

#### **Public Consultation**

It was noted that public consultation should be undertaken as the proposals develop. Attention was drawn to the Scottish Government Planning Advice Note 3/2010 – Community Engagement which provides the standards for community engagement that are expected.

#### **Community Councils**

THC advised that in terms of the appropriate Community Councils to consult, the proposal is located within the Kilmorack Community Council. It was also noted that a development of this nature might affect a number of adjacent community councils and it was recommended that adjacent Community Councils be consulted. THC advised that the Ward Manager can provide further advice and provided contact details.

Thank you for providing this information.

Noted. Thank you for providing this information.

We also hold a regular Community Liaison Group meeting with the community councils to keep them abreast of the project progress.

THC provided detail on the application process noting that they encourage the use of processing agreements for major applications such as this. This process involves setting out the key stages involved in deciding the planning application and identifying what information is needed from whom and setting time scales. THC stated that contact with the Council's Major Application Team with a view to agreeing a Processing Agreement should be made at the earliest opportunity. THC also provided information on the Councillor's code of conduct and the Scheme of Delegation along with links to these resources so that SSE can familiarise themselves with the schemes.

THC highlighted the Council's ongoing commitment to promote the increased use of Gaelic in developments within the Highlands. THC encouraged the consideration of the use of bilingual signs, both internal and external as part of the proposal. THC provided links to Gaelic resources and information and noted that their Gaelic Translation Officers would be able to assist as required.

### Transport Scotland

#### **Transport Scotland provided comments via THC on the Impact on the Trunk Road Network.**

While Transport Scotland has no comment to make on the individual site options, it should be noted that in the event that the chosen alignment of the OHL results in crossing any trunk road, a threshold assessment in line with the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Road Traffic will be required to determine whether there are likely to be any significant environmental issues associated with increased traffic on the trunk road network, and any requirement for further trunk road assessment.

It should also be noted that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area

Information on the application process is noted and appreciated. We will consult with the Council's Major Application Team to discuss a Processing Agreement.

This will be considered and implemented where practical. Thank you for providing information resources, these will be helpful in developing our knowledge in this area.

Please see individual Reports on Consultation for the separate 400kV new OHL projects (Beaully – Blackhillock – New Deer – Peterhead and Spittal – Loch Buidhe – Beaully). We will ensure adequate consultation with Transport Scotland occurs as required throughout those projects.

Manager. In addition, we would state that in the event that construction works result in the need for Abnormal Load Deliveries (ALD), Transport Scotland will require to be satisfied that the size of loads proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path. A full Abnormal Loads Assessment report should be 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.

**SEPA provided comments via THC**

SEPA provided feedback via THC on the substation and station location options.

SEPA welcomes pre-application engagement, but please be aware that SEPA's advice at this stage is based on emerging proposals and it cannot rule out potential further information requests as the project develops. Similarly, its 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.

The Preferred Option for the substation location is Option 7. SEPA agrees this is probably the option least likely to potentially negatively impact on flood risk, private water supplies (PWS) and watercourses.

The detailed comments included within this response are based on Option 7 being taken forward, but the general comments will apply to all three options. Should Option 7 not be taken forward and one of the other options preferred SEPA provides the following additional observations, and would require further consultation:

Option 7 - SEPA's data base indicates a well at NH4848543033. We require more information with confirmation of whether it is still in use and if so, what it's used for. Although this appears likely to be outwith the above buffers, SEPA will require

SEPA's comments are noted and we thank them for this additional information.

confirmation of this if it is found to be an existing abstraction in the final submission or the above guidance must be applied.

Option 4: Potential fluvial flood risk issues with adjacent properties - likely to require a full FRA and likely to require compensatory storage.

Option 9: Straightened watercourse on site appears on 1:50,000 but not on 1:25,000 map. SEPA has a presumption against culverting, but it maybe culverted already. Possibility to restore a more natural alignment?

Option 11: PWS at Phoinias House. SEPA would require confirmation this is outwith any required buffer zones at the detailed design stage.

Option 11a PWS at Meikle Phoinias. SEPA would require confirmation this is outwith any required buffer zones at the detailed design stage.

## Appendix B: New Spittal – Loch Buidhe – Beauly 400kV reinforcement – Public Consultation Event Poster



Scan me

# New Spittal – Loch Buidhe – Beauly 400kV Reinforcement Public consultation events

We have developed proposals to reinforce the onshore transmission network between Spittal and Beauly, via Loch Buidhe. To enable this connection, new additional 400kV substations and associated infrastructure is also required near the three locations mentioned above.

We are inviting interested parties to attend our drop-in consultation events, where the project team will be in attendance to answer any questions and discuss the details of the following proposed projects:

- Spittal – Loch Buidhe – Beauly 400kV connection
- New Loch Buidhe area 400kV substation
- New Spittal area 400kV substation and HVDC converter station
- New Beauly area 400kV substation and HVDC converter station

We are seeking feedback regarding our preferred route for the new overhead line and our preferred locations for the new 400kV substations and converter stations listed above.

**The consultation events will be taking place on:**

20th February (2.30–7pm)	Halkirk – Ross Institute
21st February (2.30–7pm)	Helmsdale – Bunilidh Social Club
22nd February (2.30–7pm)	Dunbeath – Dunbeath Hall
23rd February (2.30–7pm)	Golspie – Fountain Road Hall
27th February (3.30–7pm)	Bonar Bridge – Community Hall
28th February (2.30–7pm)	Ardross – Community Hall
1st March (2.30–7pm)	Dingwall – Legion Hall
2nd March (2.30–7pm)	Beauly – Kilmorack Hall
6th March (5–7pm)	Virtual event*

\*Joining details available on website

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

**Martin Godwin**  
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Find out more and register for project updates, visit the project website by scanning the QR code, or use the following URL:  
[ssen-transmission.co.uk/north-highlands](https://ssen-transmission.co.uk/north-highlands)

 SSEN Community  @SSETransmission