

# **Pre-Application Consultation Report**

## ***Spittal – Loch Buidhe – Beaully 400kV Connection***

***August 2025***



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# 1. INTRODUCTION

## 1.1 Purpose of this Report

- 1.1.1 Scottish Hydro Electric Transmission plc (the Applicant) who, operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission), own, operate and develop the high voltage electricity transmission system in the north of Scotland and remote islands. SSEN Transmission holds a license under the Electricity Act 1989 to develop and maintain an efficient, coordinated and economical system of electricity transmission.
- 1.1.2 The Applicant is seeking consent under Section 37 to the Electricity Act 1989 (as amended) to construct and operate approximately 170 kilometres (km) of new double circuit 400 kilovolts (kV) overhead transmission line (OHL) between the proposed new Banniskirk Substation and HVDC Converter Station, near Spittal and proposed new Fanellan Substation and HVDC Converter Station, near Beaully, via the proposed Carnaig Substation near Loch Buidhe (hereafter referred to as the 'Alignment Development'). A full description of the Alignment Development and its ancillary works is set out within Volume 1, Chapter 3: Project Description of the Environmental Impact Assessment Report (EIAR) that accompanies the Section 37 application.
- 1.1.3 There is no statutory requirement to undertake formal pre-application consultation (PAC) for applications made under Section 37 of the Electricity Act 1989, however, for all Section 37 applications that require Environmental Impact Assessment (EIA), the Scottish Government Energy Consents Unit (ECU) recommends, through its Good Practice Guidance<sup>1</sup>, a voluntary approach to PAC that generally aligns with the compulsory process prescribed for national and major development applications under the Town and Country Planning (Scotland) Act 1997.
- 1.1.4 The purpose of this document is to describe the PAC process SSEN Transmission has undertaken for the Alignment Development, with reference to the content requirements of PAC Reports as described in Table 1 of Section 3.2 of the ECU Good Practice Guidance and provided below in Table 1. In doing so, we demonstrate that SSEN Transmission has met the expectations of the Guidance in carrying out meaningful engagement at the earliest possible stage with communities and groups potentially affected by development proposals. Prior to the PAC process, SSEN Transmission carried out public consultation for the route and refined route stages as part of our development process.
- 1.1.5 The PAC Report requirements are listed in Table 1 below, along with commentary of where that information can be found in this Report.

**Table 1 PAC Report Requirements Table**

PAC Report requirement	Brief Summary / Location of information in this Report / Appendix
the dates on which and places where public events were held;	<ul style="list-style-type: none"> <li>Appendix E, H</li> </ul>
a description of any additional steps taken by the applicant to consult with members of the public regarding the development;	<ul style="list-style-type: none"> <li>Appendix A, J</li> </ul>
a list of bodies, groups and organisations who were consulted by the applicant and a description of how they were consulted;	<ul style="list-style-type: none"> <li>Appendix I</li> </ul>
a description of any materials sent to consultees and materials provided to those attending public events;	<ul style="list-style-type: none"> <li>Appendix B, C, F</li> </ul>

<sup>1</sup> See Section 3.2 of Scottish Government: [Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989](#). (updated July 2022)

PAC Report requirement	Brief Summary / Location of information in this Report / Appendix
copies of any visual presentation shown or displayed at a public event, and photographs of any display boards or models at public events;	<ul style="list-style-type: none"> <li>Appendix D, G</li> </ul>
confirmation as to whether consultees and attendees at public events were informed that pre-application consultation does not remove the right or the potential need to comment on the final application once it is made to the Scottish Ministers;	<ul style="list-style-type: none"> <li>Appendix E, F, H</li> </ul>
a summary of the written responses to consultations and views raised at public events, including an indication of the number of written responses received and the number of persons who attended the public events;	<ul style="list-style-type: none"> <li>Appendix A, J</li> </ul>
an explanation of how the applicant took account of views raised during the pre-application consultation process; a	<ul style="list-style-type: none"> <li>Appendix A</li> </ul>
an explanation of how members of the public were given feedback on the applicant's consideration of the views raised during the pre-application consultation process.	<ul style="list-style-type: none"> <li>Appendix A, F</li> </ul>

## 1.2 Structure of this Report

### 1.2.1 This PAC Report is comprised of six parts:

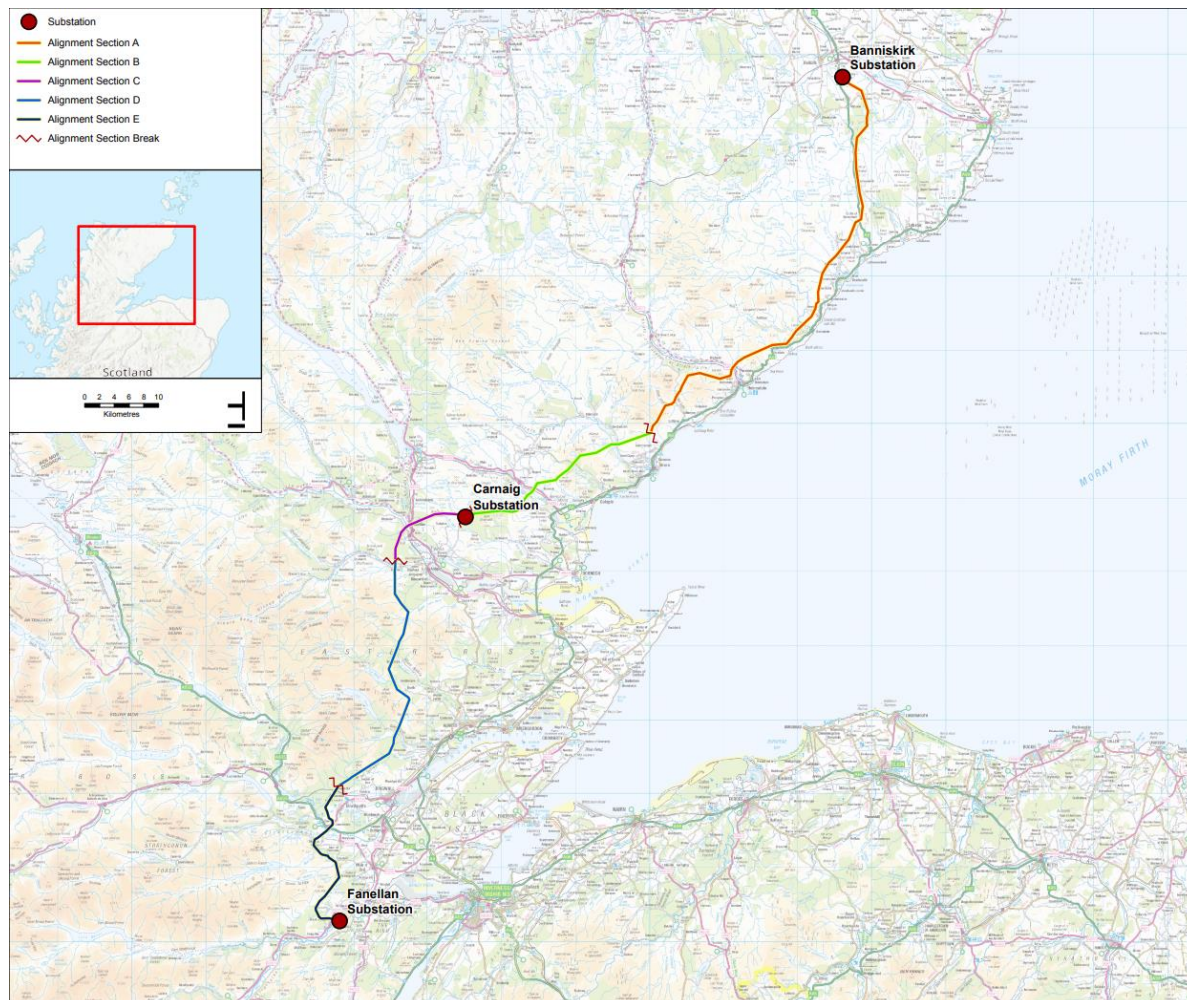
- Introduction*: sets out the purpose of the Pre-Application Consultation Report;
- Alignment Development*: outlines the background to the project and provides a description of the key elements;
- The Consultation Process*: describes the framework for consultation and methods which have been employed;
- Pre application consultation PAC 1*: Consultation Responses, Key Issues and How the Project Responded – describes how the comments and issues raised during PAC 1 events were addressed by the project;
- Pre application consultation PAC 2*: Consultation Responses, Key Issues and How the Project Responded – describes how the comments and issues raised during PAC 2 events were addressed by the project; and
- Conclusions*– provides a summary of the conclusions reached.

### 1.2.2 Appendices are attached to provide evidence of consultation carried out.

## 2. ALIGNMENT DEVELOPMENT

### 2.1 Project Background

- 2.1.1 SSEN Transmission is applying for consent under section 37 of the Electricity Act 1989 for the Proposed Development, as shown in Figure 1 below.



**Figure 1 – The Proposed Alignment**

- 2.1.2 The development falls within the administrative areas of The Highland Council.

### 2.2 Background to Proposed Development

- 2.2.1 In July 2022, the National Energy System Operator (NESO), published the 'Pathway to 2030 Holistic Network Design' (HND). This set out the blueprint for the onshore and offshore transmission infrastructure required to support the forecasted growth in the UK's renewable electricity.
- 2.2.2 Studies informing the NESO's Pathway to 2030 Holistic Network Design confirmed the requirement to reinforce the onshore corridor between Spittal and Beaulieu.
- 2.2.3 Providing a 400kV overhead line connection between these sites provides the significant capacity required to take power from large-scale onshore and offshore renewable generation connecting into the north of Scotland before transporting power to areas of demand. These projects have been highlighted as critical to enable the delivery of the UK and Scottish governments' 2030 net zero targets, with a requirement for accelerated development and delivery.

## 2.3 SSEN Transmission Route Selection Process

2.3.1 The approach to the route selection was informed by SSEN Transmission's guidance 'Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above', hereafter referred to as the 'Routeing Guidance'. The Routeing Guidance sets out SSEN Transmission's approach to selecting a route for an overhead line or underground cable development, refer to EIAR Volume 2, Chapter 4, Section 5.4 for further details on the routeing process. This document helps SSEN Transmission to meet its obligations under Schedule 9 of the Electricity Act 1989, which requires transmission license holders:

- to have a regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interests; and
- to do what they reasonably can to mitigate any effect that the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

2.3.2 The Routeing Guidance aims to balance environmental, technical and economic considerations throughout the route options process.

2.3.3 The guidance splits a project into the following stages:

- Pre-Routeing Activities: Selection of proposed connection option;
- Stage 0: Routeing strategy development;
- Stage 1: Corridor Selection;
- Stage 2: Route Selection; and
- Stage 3: Alignment Selection.

2.3.4 The stages that are carried out can vary depending on the type, nature and size of a project and consultation is carried out at each stage of the process as appropriate.

2.3.5 The following consultation was undertaken as part of the project development process for the Alignment Development:

- Route Consultation (Routeing Guidance Stages 1 and 2)\*
- Alignment Consultation PAC 1 (Routeing Guidance Stage 3)
- Alignment Consultation PAC 2

\*Corridor options were heavily constrained, largely as a result of the nature of the eastern area of northern Scotland. This meant that multiple route options within each of the corridors were unlikely to be identified. As a result, the options for corridor and route selection were broadly similar; this led to the decision to consult the communities and statutory consultees when a number of preferred route options had been identified and not at early corridor identification stage in order to allow for a more targeted consultation process. This is outlined in the Route Selection Consultation Document<sup>2</sup>.

2.3.6 At both route and alignment selection stages, consultation was undertaken for the Alignment Development. Prior to the alignment selection stage, consultation on refined routes was also undertaken. Two 'rounds' of PAC events to consult on the alignment were held, with the second given in part to providing feedback from the first round.

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<sup>2</sup> [Route Selection Consultation Document](#)



### 3. THE CONSULTATION PROCESS

#### 3.1 Overview

- 3.1.1 This section describes the methods employed during the consultation process and provides information on meetings and events held with stakeholders to obtain feedback and help inform the project development. As described in Section 2.3, consultations on the route, refined route consultation and alignment stage were undertaken. These are detailed in the following sections.
- 3.1.2 The Scottish Government's Good Practice Guidance states the expectation *that applicants "hold at least two public consultation events prior to submitting the application. The final public event taking place at least 14 days after the first public event. The public events are to give members of the public the opportunity to make comments to the applicant as regards the proposed development. At the final public event, the applicant should provide feedback to members of the public in respect of comments received by the applicant regarding the proposed development."*
- 3.1.3 In this report, the two pre-application consultation events are described, respectively, as PAC 1 and PAC 2 consultation.
- 3.1.4 It should be noted that the routeing, refined routeing and PAC 1 alignment consultation events discussed within this PAC Report were used to display information and allow feedback relative to the Banniskirk Hub<sup>3</sup>, Carnaig Substation<sup>4</sup> and Fanellan 400kV Substation and Converter Station<sup>5</sup> projects. At the PAC 2 alignment, during the Bonar Bridge event, information was displayed regarding the Shin to Loch Buidhe 132kV Overhead Line Rebuild<sup>6</sup> and Garvary Wind Farm Connection<sup>7</sup>. This approach was taken given the intrinsic connection between the proposed substations and the proposed development, or in the case of the Bonar Bridge event, their relative proximity and presence within the same local authority area. The event locations chosen ensured that events would be held within the The Highland Council area being the local authority in which the projects are proposed. To avoid confusion, project-specific information was produced in respect of each prospective submission, and there was clear separation of project information at each event.

#### 3.2 Routeing Consultations

- 3.2.1 As a stakeholder-led business, we understand the importance of involving communities and other key stakeholders throughout each stage of our project development process. Relevant and insightful 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. As such, prior to Pre-Application Consultation, public consultation events were undertaken at the following stages and dates:
- Routeing (February 2023)
  - Refined Routeing (Feb – March 2024)
- 3.2.2 Consultation at the Routeing and Refined Routeing stages, ensured that stakeholder feedback could be addressed during project development prior to further refinement. The Report on Consultation (RoC) published following the Route consultations outline the consultation process undertaken, alongside summaries of feedback received, our response and next steps. Feedback from Refined Route consultation was incorporated into our Alignment Report on Consultation following PAC 1 consultation events.
- 3.2.3 All engagement materials related to the Routeing consultation events are available to download from the project webpage<sup>8</sup>.

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<sup>3</sup> [www.ssen-transmission.co.uk/banniskirk](http://www.ssen-transmission.co.uk/banniskirk)

<sup>4</sup> [www.ssen-transmission.co.uk/carnaig](http://www.ssen-transmission.co.uk/carnaig)

<sup>5</sup> [www.ssen-transmission.co.uk/fanellan](http://www.ssen-transmission.co.uk/fanellan)

<sup>6</sup> [www.ssen-transmission.co.uk/shin-to-loch-buidhe](http://www.ssen-transmission.co.uk/shin-to-loch-buidhe)

<sup>7</sup> [www.ssen-transmission.co.uk/garvary](http://www.ssen-transmission.co.uk/garvary)

<sup>8</sup> [www.ssen-transmission.co.uk/slbb](http://www.ssen-transmission.co.uk/slbb)

### 3.3 Pre application Consultation – PAC 1

- 3.3.1 The purpose of the PAC 1 consultation events was to present our approach to developing the project, including changes made since we last engaged (Refined Routeing) and to seek feedback on our potential alignments alongside any considered alternatives.
- 3.3.2 To support the PAC 1 consultation events, a Consultation Booklet, was prepared and published in June 2024 and uploaded to the project webpage. The Consultation Booklet provided project context and project details and sought comments from stakeholders and members of the public on the proposed development (See Appendix C).
- 3.3.3 The consultation events took place at the following venues and dates/times.

**Table 1 Pre-application consultation PAC 1 events**

Venue	Date and Time
Halkirk Ross Institute, Halkirk, KW12 6XZ	Monday 3 June 2024 – 2-7pm
Spittal Village Hall, Spittal, KW1 5XR	Tuesday 4 June 2024 – 10am-12pm
Helmsdale Community Centre, Helmsdale, KW8 6JA	Tuesday 4 June 2024 – 3-7pm
Dunbeath Community Centre, Dunbeath, KW6 6JA	Wednesday 5 June 2024 – 3-7pm
Rogart Village Hall, Rogart, IV28 3XJ	Thursday 6 June 2024 – 11am-2pm
Brora Scout and Guide Hall, Brora, KW9 6PD	Thursday 6 June 2024 – 4-7pm
Bonar Bridge Community Hall, Bonar Bridge, IV24 3EA	Monday 10 June 2024 – 3.30-8.30pm
Ardross Community Hall, Ardross, IV17 0XW	Tuesday 11 June 2024 – 3-7pm
Contin Village Hall, Contin, IV14 9ES	Wednesday 12 June 2024 – 10am-1pm
Fairburn Memorial Hall, Marybank, IV6 7UU	Wednesday 12 June 2024 - 3-7pm
Garve Village Hall, Garve, IV23 2PR	Thursday 13 June 2024 – 10am-1pm
Strathpeffer Pavilion, Strathpeffer, IV14 9DL	Thursday 13 June 2024 – 3-7pm
Phipps Hall, Beauly, IV4 7EH	Wednesday 19 June 2024 – 2-7pm
Kiltarlity Village Hall, Kiltarlity, IV4 7HH	Thursday 20 June 2024– 2-7pm

- 3.3.4 At the entrance to each venue, project team staff were stationed to greet attendees and note attendee numbers. Attendees were also invited to have their names and contact details recorded so that the project team could provide email updates on project information and upcoming events.
- 3.3.5 SSEN Transmission has prepared a suite of online information leaflets and collated Frequently Asked Questions in the Pathway to 2030 FAQ's web page. Information leaflets were available at the events for attendees to read and take home, elaborating on the contents of the Consultation Document and Booklet. These covered topics such as:

- Applications under Section 37 of the Electricity Act 1989



- Electro Magnetic Fields
- Protecting Private Water Supplies
- Pathway to 2030: Why are these projects needed?
- Biodiversity Net Gain

Additional information leaflets were published to the SSEN Transmission FAQ page<sup>9</sup> in May 2024 and hard copies were available to members of the public during the events.

- 3.3.6 The printed Consultation Booklets were also available at all consultation events, and information boards and maps were available for attendees to learn more about the project at that stage of development.
- 3.3.7 A 3D interactive model of the alignment options depicting the overhead line infrastructure was also available at the PAC 1 events. The 3D model allowed attendees to view the OHL in relation to their property or from a viewpoint they specified, to give an indication of how the infrastructure would look and to assist in their consultation feedback.
- 3.3.8 Members from multiple disciplines within the project team were available to answer questions and attendees were invited to provide feedback to a set of questions via an online feedback form or a printed consultation feedback form at the rear of the consultation booklet (See Appendix C). In addition, feedback was sought via email to a dedicated inbox (slbb@sse.com) or by post to the Community Liaison Manager.
- 3.3.9 Printed copies of the Consultation Document (describing the process of OHL design development of the Potential Alignment (see Appendix B) and Route Report on Consultation (presents information on the design development for the alignment(s) progressed including describing where alternative alignments have been identified) were available to view at events along with hard copies of maps to take away (see Appendix J).
- 3.3.10 The feedback period in relation to the PAC 1 events was open from 27 May until 22 July 2024.

#### **Stakeholder engagement**

- 3.3.11 Engagement with statutory stakeholders during the pre-application consultation stage was undertaken via statutory consultee pre-application consultation meetings with SEPA and The Highland Council via Microsoft Teams in September 2024 and recurring meetings with Nature Scot and Historic Environment Scotland.
- 3.3.12 Attendees were invited to ask questions and make comments as well as submit written feedback or attend separate meetings with members of the project team if required.

#### **Online and virtual consultation**

- 3.3.13 The project webpage for the Spittal – Loch Buidhe – Beaully 400kV Connection project contained links to all published materials and the feedback form as well as an interactive story map, 3D visualisations portal, project updates, responses to FAQs, and notifications of upcoming consultation events.

#### **Publicity**

- 3.3.14 Pre application consultation events were advertised the Press and Journal on 24 and 30 May, the Caithness Courier on 22 and 29 May, the Northern Times on 24 and 31 May and the Ross-Shire Journal and Inverness Courier on 31 May and 7 June.

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<sup>9</sup> [www.ssen-transmission.co.uk/2030faqs](http://www.ssen-transmission.co.uk/2030faqs)

- 3.3.15 Dates and venues of consultation events were also publicised on the project website. In addition, SSEN Transmission's social media channels LinkedIn, Facebook and Instagram were also used to advertise the consultation events (See Appendix E).
- 3.3.16 Postcards informing of the event were also sent out to 29,073 households within proximity of the Alignment Development in May 2024 (See Appendix E).
- 3.3.17 Furthermore, an email was sent to 945 individuals registered to receive project updates and posters were placed on community notice boards.

#### **Advice on making comments to the Applicant**

- 3.3.18 Consultees were made aware that providing comments through the pre-application process would be to the applicant, SSEN Transmission, and that an opportunity to provide formal representations to the Energy Consents Unit of the Scottish Government would be available once the Section 37 application was submitted and before Scottish Ministers make a decision on the application. Examples of where this has been advised can be found in the PAC 1 poster in Appendix E and the PAC 2 Consultation Booklet in Appendix F.

#### **Report on Consultation**

- 3.3.19 The Alignment Selection Report on Consultation (RoC) was published in January 2025 and documented the refined route and alignment selection consultation process for the proposals. It outlined the number of people who attended consultation events, as well as the volume and nature of consultation responses received from members of the public, statutory and non-statutory consultees and other stakeholders. It presented summaries of feedback across common themes such as project need, environmental impacts and technology choice, and our responses to that feedback.
- 3.3.20 It also presented key decisions resulting from route and alignment specific feedback, including how the alignments taken forward had been informed by this process and, where alternative options had been presented, why they weren't taken forward as the Potential Alignment. The report concludes by confirming the key decisions and any resulting adjustments made to the Potential Alignment, that were presented at consultation, confirming the Proposed Alignment to be progressed.
- 3.3.21 Please see Appendix A for the Alignment Selection Report on Consultation.

### **3.4 Pre application Consultation – PAC 2**

- 3.4.1 The purpose of the PAC 2 consultation events was to present further detail on the Proposed Alignment and provide feedback to stakeholders in respect of comments they provided on the proposals.
- 3.4.2 To support the PAC 2 consultation events, a new Consultation Booklet, was prepared and published in February 2025 and uploaded to the project website. The PAC 2 Consultation Booklet provided project context and project details, summarising the feedback received from PAC 1 events, and sought final comments from stakeholders and members of the public on the Alignment Development (See Appendix F).
- 3.4.3 The consultation events took place at the following venues and dates/times.

***Table 2 Pre-application consultation PAC 2 events***

Venue	Date and Time
Kiltarlity Village Hall, Kiltarlity, IV4 7HH	Wednesday 19 February 2025 - 3–7pm
Phipps Hall, Beaully, IV4 7EH	Thursday 20 February 2025 - 2:30–6:30pm

Venue	Date and Time
Strathpeffer Pavilion, Strathpeffer IV14 9DL	Monday 24 February 2025 - 3–7pm
Contin Village Hall, Contin, IV14 9ES	Tuesday 25 February 2025 - 10am–1pm
Fairburn Memorial Hall, Marybank, IV6 7UU	Tuesday 25 February 2025 - 3–7pm
Ardross Community Hall, Ardross, IV17 0XW	Wednesday 26 February 2025 - 3–7pm
Bonar Bridge Community Hall, Bonar Bridge, IV24 3EA	Thursday 27 February 2025- 3–7pm,
Spittal Village Hall, Spittal, KW1 5XR	Monday 03 March 2025 - 3–7pm
Helmsdale Community Centre, Helmsdale, KW8 6JA	Tuesday 04 March 2025 - 3–7pm
Dunbeath Community Centre, Dunbeath, KW6 6EF	Wednesday 05 March 2025 - 3–7pm
Rogart Village Hall, Rogart, IV28 3XJ	Thursday 06 March 2025 -10am–12pm
Brora Scout and Guide Hall, Brora, KW9 6PD	Thursday 06 March 2025 - 3–7pm

- 3.4.4 At the entrance of each venue, project team staff were stationed to greet attendees and note numbers. Attendees were also invited to have their names and contact details recorded so that the project team could provide email updates on project updates and upcoming events.
- 3.4.5 The printed Consultation Booklets were also available at all consultation events, and information boards and maps were available for attendees to learn more about the project at that stage of development. A revised 3D model depicting any updates following the PAC 1 events was produced and available at the events, alongside flythrough videos and a visualisation portal. Copies of the Alignment Report on Consultation were also available to view. Members from multiple disciplines within the project team were available to answer questions and attendees were invited to provide feedback to a set of defined questions via an online feedback form or printed consultation feedback form at the rear of the consultation booklet. In addition, feedback was sought via email to a dedicated inbox (slbb@sse.com) or by post to the Community Liaison Manager.
- 3.4.6 Information leaflets were again available on specific issues for attendees to read and take home, elaborating on the contents of the Consultation Booklet. Updates were made to the leaflets published in May 2024 and copies were available to members of the public at consultation events following. Based on feedback received during PAC 1 consultations, a number of additional leaflets were created, namely:
- What to expect during the delivery of our projects
  - HVDC vs HVAC
  - Delivering a positive environmental legacy
  - Early Careers
- 3.4.7 Printed copies of the Alignment Selection Report on Consultation (documents the consultation responses received as part of our Alignment Selection consultation and shows how the Proposed Alignment being taken forward to the next stage has been informed by this process) were available at events.

- 3.4.8 As mentioned above, the main purpose of the PAC 2 events was to present feedback on views obtained in response to the earlier round of consultation and provide the opportunity to receive further feedback. The feedback period allowing for additional feedback was open from 05 February until 21 March 2025. In addition, local Community Councils were welcomed to get in contact with us if they wished to discuss the RoC or any other matters ahead of the PAC 2 events.

#### Stakeholder engagement

- 3.4.9 Engagement with stakeholders during the pre-application consultation stage was undertaken via statutory consultee meetings. Details of which can be found in the table below:

Date	Meeting Purpose	Stakeholder Group
18 April	Ecology	NatureScot
22 & 29 April 2024	Cultural Heritage	Historic Environment Scotland
19 August 2024	Special Arrangements	Historic Environment Scotland
19 August 2024	Special Arrangements	NatureScot
29 August 2024	Designated Sites	NatureScot
10 September 2024	Special Arrangements	SEPA
13 September 2024	Statutory engagement regarding Proposed Development	The Highland Council
27 November 2024	Ornithology	NatureScot
19 February 2025	Designated Sites	NatureScot
7 – 11 April 2025	Cultural Heritage	Historic Environment Scotland
22 May 2025	WHS	NatureScot
13 June 2025	Cultural Heritage	Historic Environment Scotland

#### Online and virtual consultation

- 3.4.10 The project webpage for the Spittal – Loch Buidhe – Beaully 400kV Connection project contained links to all published materials and the feedback form as well as project updates, links to the 3D visualisation portal, responses to FAQs, and notifications of upcoming consultation events.

#### Publicity

- 3.4.11 Pre application consultation events were advertised in the Press and Journal on 07, 12, and 18 February 2025; Inverness Courier on 07 and 14 February 2025; Ross-Shire Journal on 14 and 21 February 2025; Northern Times on 14, 21 and 28 February 2025; and Caithness Courier on 19 and 26 February 2025.
- 3.4.12 Dates and venues of consultation events were also publicised on the project website. In addition, SSEN Transmission's social media channels on LinkedIn, Facebook and Instagram were also used to advertise the consultation events (See Appendix H).

- 3.4.13 Postcards informing of the event were also sent out to 29,073 households within proximity of the Alignment Development in February 2025 (See Appendix H).
- 3.4.14 Furthermore, an email was sent to 971 individuals registered to receive project updates.

**Advice on making comments to the Applicant**

- 3.4.15 Consultees were made aware that making a comment through the pre-application process was to the Applicant (SSEN Transmission) and that an opportunity to provide formal representations to the Energy Consents Unit (ECU) of the Scottish Government would be available once the Section 37 application for consent was submitted. Examples of where this has been advised can be found in the PAC 2 Consultation Booklet in Appendix F.

## 4. PRE APPLICATION CONSULTATION PAC 1 RESPONSES, KEY ISSUES AND HOW THE PROJECT RESPONDED

### 4.1 Overview

4.1.1 This section summarises the PAC 1 responses, and how the project responded to them.

4.1.2 Table 3 details the consultation events held at various locations and shows the number of attendees at each event. In total there were 552 attendees across all the events. Attendance figures reflect the number of people who registered their attendance at the consultation events on the day. For busier events, the number of attendees was often considerably higher than recorded. A total of 130 responses was received. These were received in the form of the feedback form, or written responses received in the project inbox or by mail.

**Table 3 PAC 1 consultation event details and number of attendees**

Venue	Date	Number of attendees
Halkirk	03 June 2024	48
Spittal	04 June 2024	14
Helmsdale	04 June 2024	28
Dunbeath	05 June 2024	44
Rogart	06 June 2024	35
Brora	06 June 2024	35
Bonar Bridge	10 June 2024	54
Ardross	11 June 2024	30
Contin	12 June 2024	13
Fairburn	12 June 2024	42
Garve	13 June 2024	2
Strathpeffer	13 June 2024	61
Phipps	19 June 2024	77
Kiltarlity	20 June 2024	69

### 4.2 Pre application Consultation PAC 1 Responses

4.2.1 A summary of the feedback received from all stakeholders (statutory and non-statutory consultees, the local community and members of the public) in response to the PAC 1 consultations during the consultation period which ran from 27 May 2024 to 22 July 2024, were documented in the Alignment Selection Report on Consultation, published in January 2025 and can be viewed in Appendix A.



## 5. PRE APPLICATION CONSULTATION PAC 2 RESPONSES, KEY ISSUES AND HOW THE PROJECT RESPONDED

### 5.1 Overview

5.1.1 This section summarises the pre application consultation PAC 2 responses, and how the project responded to them.

5.1.2 Table 4 sets out the consultation events and shows the number of attendees at each event. In total there were 666 attendees across all the events. Attendance figures reflect the number of people who registered their attendance at the consultation events on the day. For busier events, the number of attendees was often considerably higher than recorded. A total of 53 responses were received from statutory and non-statutory consultees. These were received in the form of the feedback form, or written responses received in the project inbox or by mail.

**Table 4 PAC 2 consultation event details and number of attendees**

Venue	Date	Number of attendees
Kiltarlity	19 February 2025	68
Beauly	20 February 2025	84
Strathpeffer	24 February 2025	103
Contin	25 February 2025	62
Marybank	25 February 2025	44
Ardross	26 February 2025	34
Bonar Bridge	27 February 2025	86
Spittal	03 March 2025	40
Helmsdale	04 March 2025	23
Dunbeath	05 March 2025	27
Rogart	06 March 2025	23
Brora	06 March 2025	72

### 5.2 Pre application Consultation PAC 2 Responses

5.2.1 A summary of the feedback received from statutory and non-statutory consultees, the local community and general public following the consultation period which ran from 05 February to 21 March 2025, alongside SSENT Transmission project responses, is set out below.

Theme	Response
<b>Impact on Landscape and Natural Beauty</b>  Concerns were expressed regarding the visual and environmental impact of the proposed overhead line on landscapes, natural beauty spots, and designated areas.	Our approach to the alignment of the Proposed Development is to seek to minimise the impacts of new infrastructure on both the environment (including a range of natural and cultural heritage features) and on communities who live, work and spend time in these areas. We seek to find the best

Theme	Response
<p>Potential damage to iconic views, recreational areas, and the overall character of the Highlands was highlighted.</p> <p>Less impactful alternatives such as underground cabling or subsea transmission systems were suggested.</p>	<p>balance between the range of constraints considered whilst also ensuring the proposal is technically feasible, economically viable and capable of achieving consent.</p> <p>We follow SSEN Transmission's Guidance 'Procedures for Routeing Overhead Lines and Underground Cables of 132 kV and above' (referred to as SSEN Transmission's 'Routeing Guidance'), which is informed by the Holford Rules, and enables us to consistently and rigorously select corridors, routes and alignments.</p> <p>As well as technical and environmental appraisals, consultation is also undertaken with the public, landowners, consenting authorities and statutory and other consultees. Feedback from this consultation helps to inform which options achieve the best balance and least overall constraint across environmental, technical and cost considerations. The selected option is then taken forward to the next stage of development.</p>
<p><b>Underground and Subsea Cabling</b></p> <p>Many stakeholders advocate for underground or subsea cabling instead of overhead pylons, due to concerns about environmental impact, visual pollution, and community disruption.</p>	<p>The environmental, technical, and operational constraints associated with underground cabling at 400 kV make this option extremely challenging to deliver in many areas of Scotland.</p> <p>Even if technically feasible, underground cables over a significant length, or the entirety, of a project would be unreasonable as it would be contrary to our license obligations to be economical and efficient in respect of additional costs to the end consumer, while presenting an additional risk to the electricity transmission network in the event of cable failure and consequent outages. Given these constraints and our responsibility for an economical and efficient transmission network, OHLs are our main choice for the Spittal – Loch Buidhe – Beaully 400kV connection.</p> <p>Due to the significant volume of power, we need to connect and transport from generation source to areas of demand, the National Energy System Operator (formerly National Grid ESO) concluded that there is a need for both onshore and offshore network reinforcements within the Holistic Network Design (HND).</p> <p>OHL's can carry roughly three times more power than subsea cables, making them more efficient and cost effective for energy bill payers. Technical challenges and constraints limit the use of subsea cables as a single solution. Moreover, onshore</p>

Theme	Response
	reinforcements help support local electricity needs and improve the network's reliability across northern Scotland.
<b>Impact on Wildlife and Biodiversity</b>  Concerns are raised about the project's potential impact on local wildlife, including protected bird species, and the overall biodiversity of the areas affected by the proposed infrastructure.	<p>We recognise the diversity of wildlife in these areas.</p> <p>An Environmental Impact Assessment Report (EIA Report) will be submitted as part of our Section 37 application for consent. The EIA Report will include specific chapters reporting on the predicted ecological and ornithological impacts of the proposals, setting out the likely significant effects and mitigation measures.</p> <p>Where required, Species Protection Plans (SPPs) will be agreed with NatureScot for all protected species which have the potential to be adversely affected by the proposals.</p> <p>For projects of this scale, we will prepare a Construction Environmental Management Plan (CEMP) prior to construction commencing. Implementation of the CEMP will ensure that best practice measures are employed during construction to prevent pollution including preventing the spread of invasive species.</p>
<b>Impact on Local Communities and Economy</b>  Feedback highlights concern about the project's potential negative effects on local communities including tourism, and economy.  Stakeholders emphasize the importance of preserving community well-being and the economic benefits derived from tourism.  A number of suggestions were provided for potential community initiatives, including support for local projects and infrastructure improvements.	<p>A Tourism and Recreation Assessment will be undertaken and its findings presented in the EIA Report. It will look at changes to the availability, accessibility and amenity of tourist attractions and changes in the availability of tourist accommodation due to the influx of construction workers during the construction of the proposed OHL. This will ensure that appropriate consideration is given to these issues as part of the consenting process.</p> <p>A Socio-Economic Report will accompany the application for consent.</p> <p>We are actively committed to maximising opportunities to support local businesses and the economy throughout the construction phase and work with the main contractors to use local supply chains where possible. Project specific opportunities will be developed, and local partners identified as the project moves towards construction.</p> <p>The Community Benefit Fund will provide a direct opportunity for us to work with local communities that will be affected by the proposal on a variety of local initiatives. These will directly support</p>

Theme	Response
	<p>communities across the north of Scotland and will be community-led.</p> <p>We are grateful to all respondents that have suggested opportunities that might be useful for the area. We continue to encourage suggestions to be made and are looking for opportunities to provide support to local groups and organisations. We will carefully consider how to ensure that the local communities benefit from our proposed project. We also intend to support local community initiatives through job creation, career opportunities, our housing strategy and through environmental enhancement.</p>
<p><b>Consultation Process and Transparency</b></p> <p>Stakeholders express dissatisfaction with the consultation process, criticising it for lack of transparency, insufficient communication, and perceived disregard for community input. They request more open discussions, evidence of consideration for community feedback, and detailed information on project proposals and environmental assessments.</p>	<p>We held a number of public consultation events, public meetings and group engagements, using a range of methods to promote our consultations to our stakeholders. Throughout the consultation process we have listened closely to identify areas of concern relevant to the projects design, allowing us to consider our next steps prior to refining proposals. This has involved amending our proposals and considering and investigating alternative routes in some areas.</p> <p>We recognise there is always room for improvement in the way we consult local communities, and we will continue to welcome feedback on how we can further improve how we consult with our stakeholders.</p>
<p><b>Impact on Property Value and Compensation</b></p> <p>Respondents report significant concerns about the proposed project's impact on property values, with some experiencing financial loss due to decreased property offers.</p>	<p>We understand that there are concerns about the potential impact on properties and businesses within the vicinity of our proposed OHL. We have sought to work closely with communities and engage with property owners and seek to mitigate impacts.</p> <p>As a regulated business, we are obliged to follow a statutory legal framework under the Electricity Act 1989 and Land Compensation (Scotland) Act 1963. If you are entitled to compensation under the legal framework we will assess any claim on a case-by-case basis under the direction of this legal framework. If this is the case, we will recommend that you engage a professional adviser and we generally meet reasonably incurred professional fees in these circumstances.</p>
<p><b>Ground Investigation Works</b></p>	<p>Ahead of the submission of our Section 37 consent application for our proposed Spittal - Loch Buidhe - Beaully 400kV overhead line project, we have been</p>

Theme	Response
Stakeholders raised concerns regarding Ground Investigation (GI) Works being undertaken ahead of project consent being granted.	<p>carrying out Ground Investigation (GI) Works at some of the proposed tower locations. This work is a necessary step in any new development and the results will help establish the final tower foundation design. This typically involves drilling boreholes and/or digging trial pits, allowing engineers to understand the engineering properties of the soil and rock beneath potential tower locations and their ability to support the structures.</p> <p>The GI Works are carried out using Permitted Development rights available to SSEN Transmission under Class 40, (1), (c) of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (as amended), being necessary survey works.</p> <p>Our contractors will work to keep local disturbance to a minimum throughout the duration of these works.</p>
<p><b>Fragmentation of a Single Nationally Significant Project</b></p> <p>It was raised that SSEN Transmission's 'Pathway to 2030' projects should be treated as a single unified project and that a fragmented approach has been adopted to circumvent environmental assessment.</p>	<p>Our 'Pathway to 2030' overhead line (OHL) projects are classed as Environmental Impact Assessment (EIA) developments as they meet the criteria for Schedule 1 development set out in the 2017 EIA regulations, therefore, we proceeded to submit an EIA Scoping Request to the Scottish Government Energy Consents Unit (ECU).</p> <p>An EIA Scoping Opinion was then adopted by the ECU following consultation with the local planning authority and other statutory consultees. This confirms the scope of environmental issues that the EIA Report must address and specifies the information to be included in the assessments.</p> <p>Our substation and converter station applications which connect into the 'Pathway to 2030' OHL projects are also accompanied by EIA Reports.</p> <p>The EIA Report which will accompany our OHL consent application, will assess the environmental effects of the development, as well as the cumulative impacts of other infrastructure that is associated with our other ASTI projects, for example, substations associated to the OHL project.</p>

## 6. CONCLUSIONS

- 6.1.1 This PAC Report documents the consultation undertaken with statutory and non-statutory consultees as well as the public across the two consultation event stages (PAC1 and PAC 2) of the Spittal – Loch Buidhe – Beaully 400kV Connection project, now submitted to the Scottish Government Energy Consents Unit under Section 37 of the Electricity Act 1989.
- 6.1.2 Pre-application consultation was planned having regard to the expectations for pre-application consultation described in the Scottish Government’s Good Practice Guidance.
- 6.1.3 PAC 1 consultations were carried out at 14 locations in June 2024, and via the project webpage, following extensive publicity in local press, social media, direct email communications, mailouts, and the project website. A feedback period was then open for 8 weeks, following which, feedback was collated and analysed in the lead up to the PAC 2 consultation events, which took place in February and March 2025.
- 6.1.4 Information in respect of both events was published by the project team and made available at the events themselves and online via the project website, including two consultation booklets, consultation document, information banners, large format plans and maps, 3D visualisations, and information leaflets on various topics.
- 6.1.5 The consultation was designed to facilitate engagement with the local community, community councils, statutory authorities and Elected Members to invite feedback on the proposals, and latterly to provide summaries of feedback with a response from SSEN Transmission. A feedback period of 6 weeks was open following the PAC 2 consultation, to capture any additional feedback.
- 6.1.6 The approach to public consultation has ensured that stakeholders and consultees have been given the opportunity to comment on the proposals and understand how feedback has been taken on. This has enabled locally important issues and concerns to be identified and subsequently considered in the preparation of the Spittal – Loch Buidhe – Beaully 400Kv Connection Section 37 application.