Bingally 400 / 132 kV Substation
Design & Access Statement

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Prepared for **Scottish and Southern Electricity Networks Transmission**

1. Introduction

1.1 This Design and Access Statement (DAS) (incorporating Sustainable Design Statement) has been prepared to support a planning application by Scottish Hydro Electric Transmission plc ("the Applicant"), operating and known as Scottish and Southern Electricity Networks Transmission ("SSEN Transmission") for planning permission under the Town and Country Planning (Scotland) Act 1997 (as amended) for consent to construct and operate a new 400 / 132 kilovolts (kV) substation 'Bingally Substation' and access track 2.9 km south of Tomich within The Highland Council (THC) local authority area, hereafter referred to as "the Proposed Development". In this DAS, the terms 'Applicant' and 'SSEN Transmission' are used interchangeably unless the context requires otherwise.

1.2 The Proposed Development is required as a result of the Scottish and UK Government's Net Zero climate change targets which require significant increases in renewable generation. As such, significant investment in new transmission network infrastructure to transport renewable energy and reinforce the network is required and is a priority. As part of this UK network reinforcement, there is a need to upgrade the existing Beauly-Denny 275kV circuit to 400kV to mirror the ratings of the existing 400kV circuit which runs along the route to enable future connections and export routes to areas of demand. This upgrade can make use of the existing overhead line (OHL) infrastructure but requires the construction of two new 400kV substations at Braco West and in the Fasnakyle area, as well as modifications or extensions to other substations along the route, including Fort Augustus, Errochty, Kinardochy and Tummel. New connections into the substations will also be required as part of the upgrade.

1.3 The energy regulator, Ofgem, approved the need for the project as part of its Accelerated Strategic Transmission Investment (ASTI) framework decision. The project, alongside several other major network upgrades planned in the north of Scotland, forms part of a Great Britain wide programme of works that are required to meet UK and Scottish Government energy targets. There is a strong expectation from both Governments and Ofgem, that these projects will be delivered by 2030. Specifically, these projects are needed to deliver the Governments 2030 renewable targets as set within the British Energy Security Strategy (BESS) (April 2022).

1.4 SSEN Transmission has a licence obligation to invest in its existing assets to maintain network health and conditions, thereby improving operational flexibility and resilience.

1.5 A DAS is required to support the submission of a major planning application as set out in the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. A DAS has a role in conveying design principles which have determined the design and layout of the development proposed, taking account of specific site and locational circumstances.

2. The Site and Site Selection

Site Location and Setting

2.1 The Proposed Development (the Site) would be located in an upland area towards the eastern side of Strathglass, within The Highland Council area of Scotland. The Site area

covers approximately 10 km due to the inclusion of the main substation works and the associated access track. The Site extends from land east of Cannich in the north (centred on NGR NH 35128 31676) to land near Guisachan Forest in the south (NGR NH 30040 23897). The Proposed Development encompasses the route of the access track, with the substation positioned at the southern boundary. The Proposed Development is shown in EA Volume 2, Figure 3-1.

2.2 A new permanent access track from the A831 would be constructed to provide access to the proposed substation site. This access track would utilise existing access track (6.1 km), with the addition of an off-line section where the original Beauly-Denny OHL track was previously reinstated (approximately 3.4 km).

2.3 The land use within the Site is a combination of commercial forestry, both mature and recently felled, and areas of rough grazing. Commercial forestry also predominates the valley sides flanking Strathglass, which restricts views from most settlements that are located along Strathglass. The existing Beauly-Denny OHL crosses the Site from northeast to southwest, and access tracks related to construction of the existing OHL and, latterly, forestry operations are present throughout much of the Site.

Site Selection

2.4 A site selection exercise was undertaken to determine the location of the proposed 400 / 132kV substation. The Site Selection process is reported within Chapter 4 of the supporting Environmental Appraisal (EA).

2.5 The process followed the Applicant's internal guidelines on siting of new substations. The objective of these guidelines is:

"To facilitate the design, consenting and operation of new substations in a manner that is technical, feasible and financially viable which causing, on balance, the least disturbance during construction and operation to the environment and the people who live, work and use

2.6 Potential sites need to be developable in technical terms and able to receive consent from an environmental, planning, and economic development policy perspective, taking into account national and local environmental and planning regulations and legislation. Securing ownership of land is a fundamental part of the process with key requirements for the new site, such as proximity to the existing Fasnakyle Substation, sufficient size, minimal environmental impact, and additional capacity for future connections would also need to be considered.

2.7 Sixteen potential sites were identified and evaluated using multicriteria analysis, site walkovers, and desktop studies. Eleven sites were excluded based on various constraints, leaving five shortlisted sites. Several environmental and engineering surveys were undertaken to supplement desk-based assessments. The five options were then compared based on environmental, engineering, and cost factors.

2.8 Following an analysis of each site it was identified that the Proposed Site was Site 9a. Option 9a was the best on balance for environmental and engineering factors, being least constrained by watercourses, recreational aspects, proximity to cultural heritage assts and Native Woodland. Furthermore, the proposed Site has the least significant gradient average across the site and is more centrally located for connections. After consideration of capital and operational costs, it was determined that Proposed Site was neutral between the options for Cost. After a review of consultation responses, it was concluded by the Applicant that Site 9a should be taken forward as the Proposed Development.

Stakeholder Engagement and Pre-application Consultation

2.9 The Proposal of Application Notice (PAN) was submitted to the Highland Council on 4th March 2024, initiating a consultation period of at least 12 weeks before a planning application can be submitted. The PAN boundary includes the proposed platform, access track and various site requirements, many of which are temporary and will be removed upon

completion. There is a requirement to hold at least two events to provide the opportunity for members of the public to comment on the Proposed Development.

2.10 Public events were undertaken at the following dates:

- A voluntary Site Selection Consultation event was held on Tuesday 5th September 2023 between 12 PM and 5.30 PM at Cannich Hall, Cannich, IV4 7LJ. This event introduced the project to members of the public, local stakeholders, and statutory authorities and outlined the site selection process undertaken to result in a proposed site to take forward to the detailed design stage. The feedback period ran to the 17th of October 2023.
- In addition to the in-person event, a virtual Site Selection Consultation event was held on Thursday the 7th of September 2023 between 5.30 PM and 7 PM. This event was held via a virtual consultation room which provided information boards giving an overview of the project and the type of infrastructure proposed. During the virtual consultation event, a live chat function was available for members of the public, local stakeholders, and statutory authorities to ask questions about the project.
- The first Pre-Application Consultation event was held on Wednesday 27th of March 2024 between 2 PM and 7:30 PM at Cannich Hall, Cannich, IV4 7L, with consultation materials published two weeks prior. This event provided the opportunity for members of the public, local stakeholders, and statutory authorities to view the Proposed Development during the detailed design stage, ask questions and provide feedback in person. The feedback period ran to the 8th of May 2023.
- The second Pre-Application Consultation event was held on Tuesday 18th of June 2024 between 2 PM and 7 PM at Cannich Hall, Cannich, IV4 7LJ. This event provided feedback to members of the public in respect of comments received following the first Pre-Application consultation event, and to provide further opportunity to view information about the project, ask questions and provide feedback in person.

2.11 A Consultation Booklet was published alongside each public event that mirrored the information provided at the events detailing key project elements, the site selection process to date, and key questions for feedback. Public events were attended by members of the SSEN Transmission project team and appointed consultants and included information boards and large format maps.

2.12 A range of responses were recorded, most notably concerns about the potential impacts on the local community including visual and tourism impacts. Furthermore, concerns were expressed regarding the need of the development. Concerns on tourism and landscape are addressed though the Socio-Economic Report and the Landscape and Visual Impact Assessment, included as part of the planning application. Concerns on the need of the development have been addressed by clearly outlining SSEN Transmission's 'Pathway to 2030' project and its need and benefits. Specifically stating the economic benefits to local and Scottish jobs as well as the UK's economy. Furthermore, it was confirmed following public consultations that the Preferred Site was considered the best on balance due to having fewer environmental constraints, including the limited impact on protect habitats and species and being situated further away from watercourses, natural and cultural designations and listed buildings than other options. Due to the overall benefits and needs of the project and the Site being the best on balance, the site was taken forward.

3. The Proposed Development

3.1 Chapter 3 of the EA describes the elements required for the construction and operation of the Proposed Development. Including a description of the key components and information regarding the construction, operation and maintenance of the Proposed Development.

2.1 In summary, the Proposed Development comprises the construction and operation of a new 400 / 132 kV air insulated substation and switchgear building located on a level platform and the formation of associated earthworks, access, drainage, landscaping, security, and the

creation of a temporary construction compound and laydown/equipment and materials storage areas. The General Arrangement drawing for the Proposed Development is shown below in EA Volume 2, Figure 3-2.

400 / 132 kV Substation Equipment and Technical Requirements

- Substation platform of approximately 376 m (length) x 271 m (width) with associated earthworks and importation of material as required;
- Two 400 / 132 kV Super Grid Transformers (SGTs);
- A 400 / 132 kV double busbar;
- Space provision for three 400 kV bays for future connections;
- A 132kV double busbar;
- Space provision for four 132 kV bays for future connections; and
- Ancillary equipment for all bars, bays and transformers.

Operational Infrastructure

3.2 In light of the scale of the Proposed Development the following are required to support operational requirements;

- A new control building with dimensions 49 m (width) x 24 m (length) x 7 m (height);
- Two new towers (Tower 79R and Tower 78R) up to a maximum height above ground level of approximately 64 m located along the existing Beauly-Denny OHL to make the connection into and out of the Proposed Development, along the north / northwestern boundary of the Proposed Development;
- Establishment of approximately 9.5 km of access track, comprising upgrade of approximately 6.1 km of existing track and approximately 3.4 km of new track;
- Permanent drainage systems and associated sustainable drainage systems (SuDS) basins;
- Erection of a 4m high palisade security fencing;
- Post construction mitigation measures including peatland restoration and landscape mitigation planting; and
- Biodiversity enhancement works including native species planting and habitat creation.

Enabling Works

3.3 The enabling works will include (but not be limited to) existing utilities diversions including private water supplies, installation of new temporary and permanent water, electrical and telecommunications services, public road improvements and establishment of a temporary construction compound including welfare facilities and laydown areas.

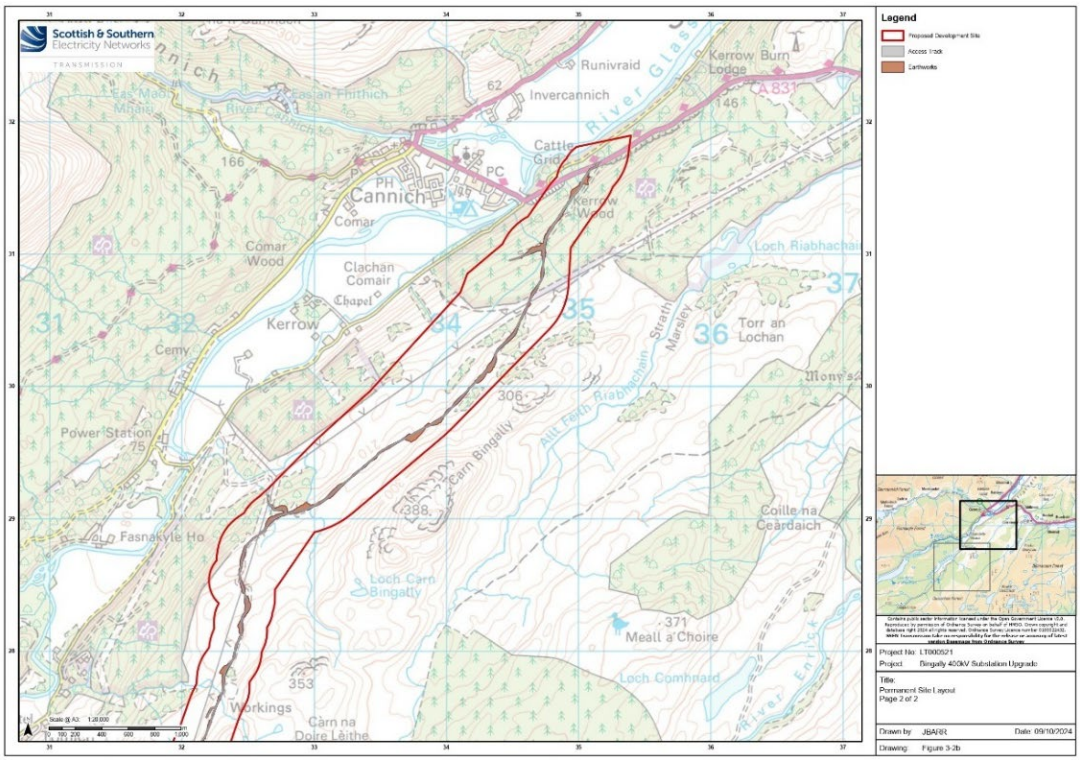
3.4 The following ancillary development would be required as part of the Proposed Development to facilitate or enable construction and operation:

- Site clearance;
- Earthworks (including landscaping);
- Relevant public road improvements (including a new bellmouth for the access track);
- Drainage;

- Permanent water supply;
- PIR lighting;
- Security fencing;
- A temporary site compound will be required to facilitate construction;
- Biodiversity enhancement measures; and
- Short-term temporary OHL diversions during construction comprising two temporary towers (Tower 79T and Tower 78T) up to a maximum height above ground level of approximately 61 m. Works also include:
  - Temporary works areas including a 50 x 50 m tower laydown at permanent and temporary tower positions;
  - Temporary and permanent access track spurs (branching off the proposed Bingally substation access track) to facilitate the construction and maintenance of the OHL. The exact location of these tracks is still to be confirmed; and
  - Following connection to the proposed Bingally substation, dismantling of the two redundant temporary towers (Tower 79T and Tower 78T).

3.5 Further detailed description of the Proposed Development and infrastructure details are provided within Chapter 3 of the EA Report, with Figure 3-1 and 3-2 below showing the proposed site layout and construction elements of the Proposed Development.

Figure 3.1: The Proposed Site Layout



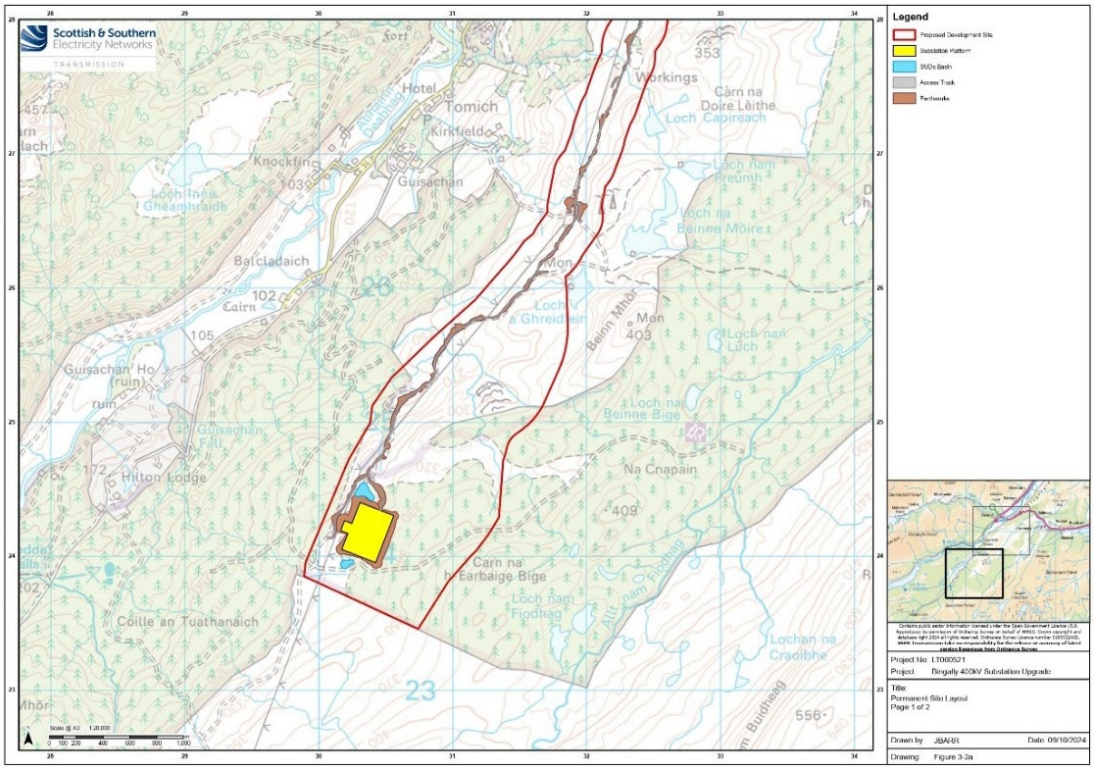
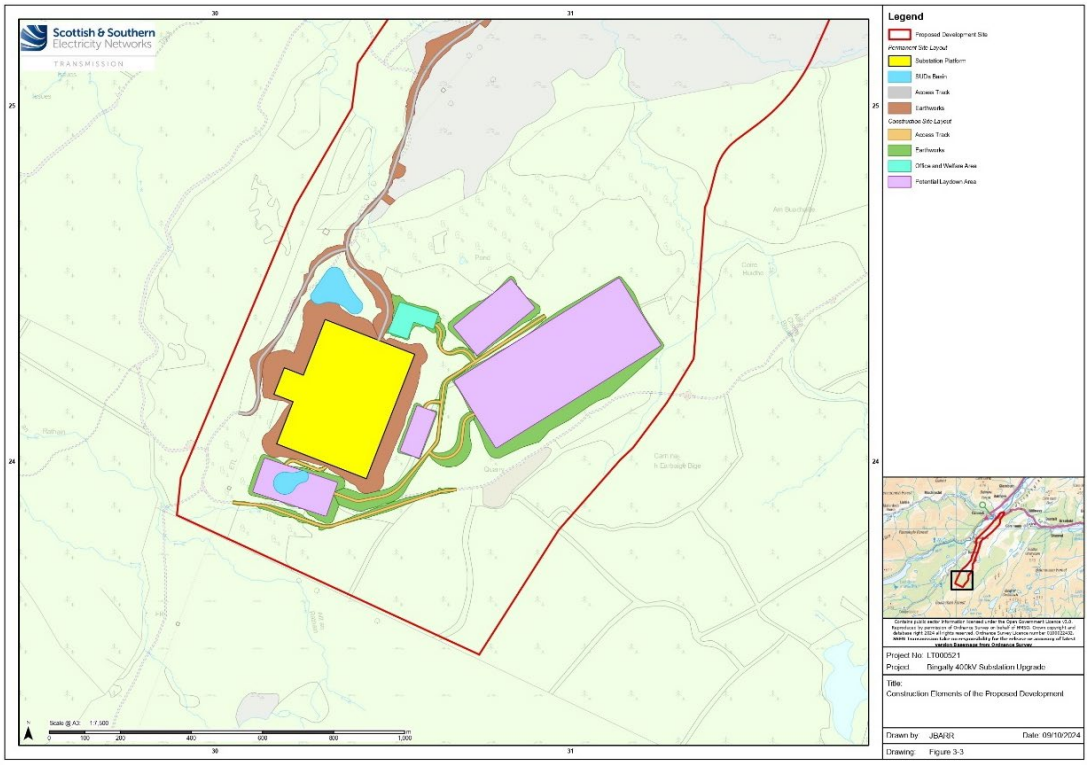


Figure 3.2 Construction Elements of the Proposed Development



4. Design

Key Design Principles and Objectives

4.1 Design principles have been adopted to ensure the Proposed Development is sited and designed as sensitively as possible to the environment and the context in which it sits.

4.2 Legislation and standards drive the basic design with the functionality of each Substation / Switching Station required by the Applicant as an Electricity Undertaker, and this is prescribed within the National Electricity Transmission Security and Quality of Supply Standard. The Applicant prepared a layout for the Substation determined by these system requirements.

4.3 The basic layout requirements for the Proposed Development dictate the amount of space required. In this case, the size required was then examined relative to the land available at the determined location and an optimal orientation of the main development components was determined, taking into consideration the following factors:

- Access and connectivity;
- Footprint requirements;
- Hazards;
- Environmental considerations;
- Natural heritage designations;
- Cultural heritage designations;
- People;
- Land use and topography;
- Screening opportunities; and,
- Planning regulations.

4.4 The optimal design and orientation of development components with the lowest risk of impacts on potential sensitive receptors was chosen. The layout and design of the Proposed Development has sought to minimise the potential permanent effects.

4.5 Key design principles and objectives followed in the design evolution of the Proposed Development included:

- Optimise the development 'footprint' within the Site to limit the area required for development, to minimise visual impact in the wider landscape and to utilise existing screening afforded by forestry and landform;
- Minimise the disturbance or displacement of protected species;
- Utilise existing access and minimise need for land take with regard to reducing potential disturbance on natural and human environment;
- Minimise traffic required during construction;
- Minimise the potential impact on nearby sensitive human receptors during construction and operation;
- Propose appropriate architectural form, colour and materials;
- Maximise available land for additional planting and mounding to improve screening and provide habitat and biodiversity enhancement; and
- Take advantage of and minimise changes to the existing ground form and levels.

Sensitive Receptors

4.6 The layout and design of the Proposed Development has examined the potential impacts on sensitive receptors and features within the surrounding environment. This information has been embedded into the iterative design process to minimise the potential for permanent

effects on the sensitive receptors. Potential sensitive receptors within the study area are those where physical or perceptual effects may result as a consequence of the Proposed Development. These receptors can be defined from the following measures:

> Physical Features: perceptible physical features (e.g. topographic features; woodland, hedgerows, field enclosure) which could be lost or altered through the introduction of the Proposed Development.

> Designated and non-designated Heritage assets: Cultural heritage in this context refers to the above and below-ground archaeological resource, built heritage, the historic landscape and any other elements which may contribute to the historical and cultural heritage of the area which could be lost or altered through the introduction of the Proposed Development. Various designated and non-designated assets have been found within the study area for the Proposed Development. Mitigation in the form of monitoring and temporary fencing would be sufficient to ensure there are no significant residual effects.

> Landscape

- Landscape Character Types (LCTs) which display both physical and perceptual characteristics which could be affected by the Proposed Development.
- Designated Landscape Areas: Areas of landscape which are principally designated for their scenic quality or rarity and considered of particularly increased value. Often defined by a number of key characteristics and/or special qualities informed by the underlying character of the landscape, consideration is given to how these may be affected and how the designated area may be altered by the Proposed Development. There are no designated sites in or immediately surrounding the site.

> Ecology and Ornithology:

Direct and indirect effects during construction and operation on protected and notable species as a result of loss or fragmentation of habitats, specifically bats, reptiles otters, water voles, badgers, red squirrel, pine marten, and black grouse. This can be through lighting, noise, pollution or visual disturbance.

> Noise impact on residential receptors during construction and operation of the Proposed Development. The nearest residential Noise Sensitive receptors (NSRs) are Glass House (400 m from the access track), Birchwood House (770 m from the access track, and Challenger Lodge, 1.14 km from the access track, and 1.6 km from the substation). These NSRs are deemed to be representative of nearby residences in the Study Area. If the noise criteria can be met at the closest NSRs, then any property at a greater distance will also meet the criteria as noise will reduce to a smaller value at a greater distance.

Design Considerations

4.7 The design elements of the Proposed Development encompass a comprehensive range of activities designed to enhance the site's infrastructure and environmental sustainability. Key elements include extensive cut and fill operations to create a stable platform for the electrical infrastructure, landscape planting around the platform to screen the electrical infrastructure, and upgrades and extensions to the existing forestry roads to provide access.

4.8 The development will see the erection and commissioning of electrical equipment, a single-storey control building no greater than 7 meters in height, and a perimeter fence potentially up to 4 meters high. The Site will also feature permanent internal accesses and parking spaces within the substation platform area, as well as temporary site compounds, laydown areas, material storage areas, and welfare facilities during the construction stage.

4.9 Figures 4.1 and 4.2 below identifies landscape mitigation measures that have been integrated into the design. Landscape and visual considerations have been important in

informing the identification and evaluation of the layout option for the substation and landscape elements within the site, in collaboration with ecology and biodiversity net gain (BNG) assessments. Landscape measures comprise of planting of wet woodland on the NVC community M25, planting of other Scot's Pine Woodland to the west of the Site, peatland restoration on degraded blanket bog near the substation platform and heathland restoration flanking the proposed track route.

4.10 Visual mitigation is limited to ensuring established native woodland cover remains southwest and east of the Proposed Development and proposed Scots pine and wet woodland helps to mitigate new electrical infrastructure from views along the northern boundary.

4.11 Two SuDS basins are also incorporated into the design. It is noted in Figure 4.1 that the water levels will vary and as such it is expected that the SuDS basins will not to be permanently wet.

4.12 Where proposed OHL is shown, no landscaping bunds or vegetation of significant height would be included. This is to ensure that the minimum safety standards for clearances beneath OHL are maintained and to ensure that mature vegetation does not pose a safety risk were trees to fall.

Figure 4.1 Landscape Restoration Plan

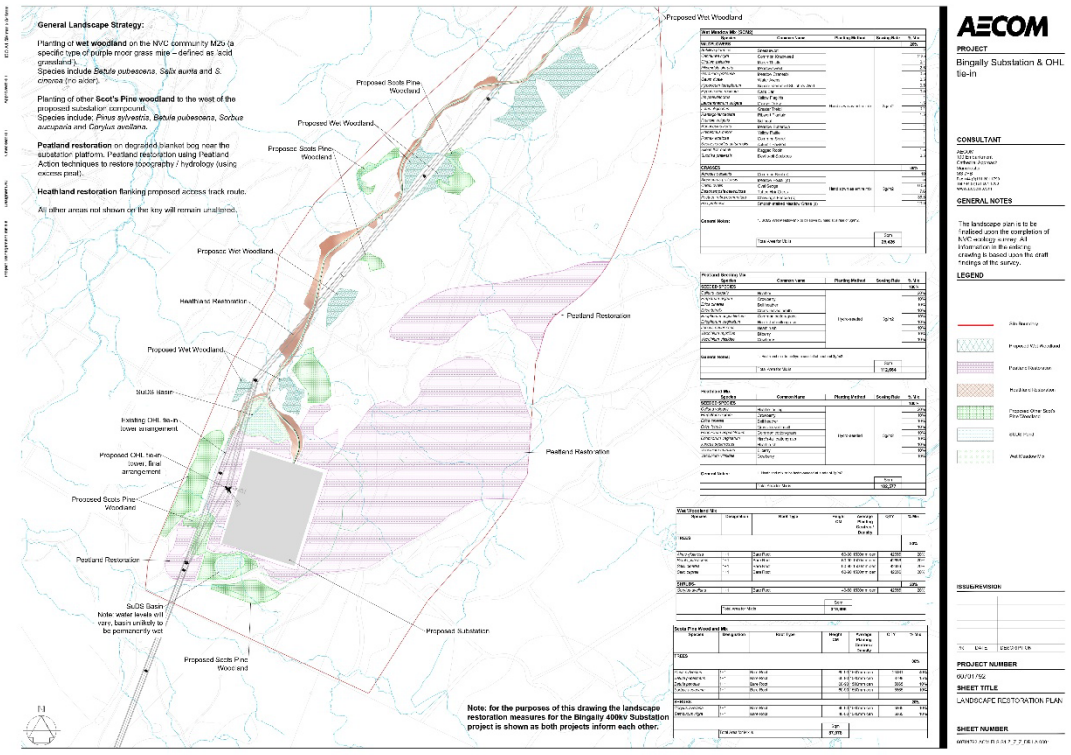
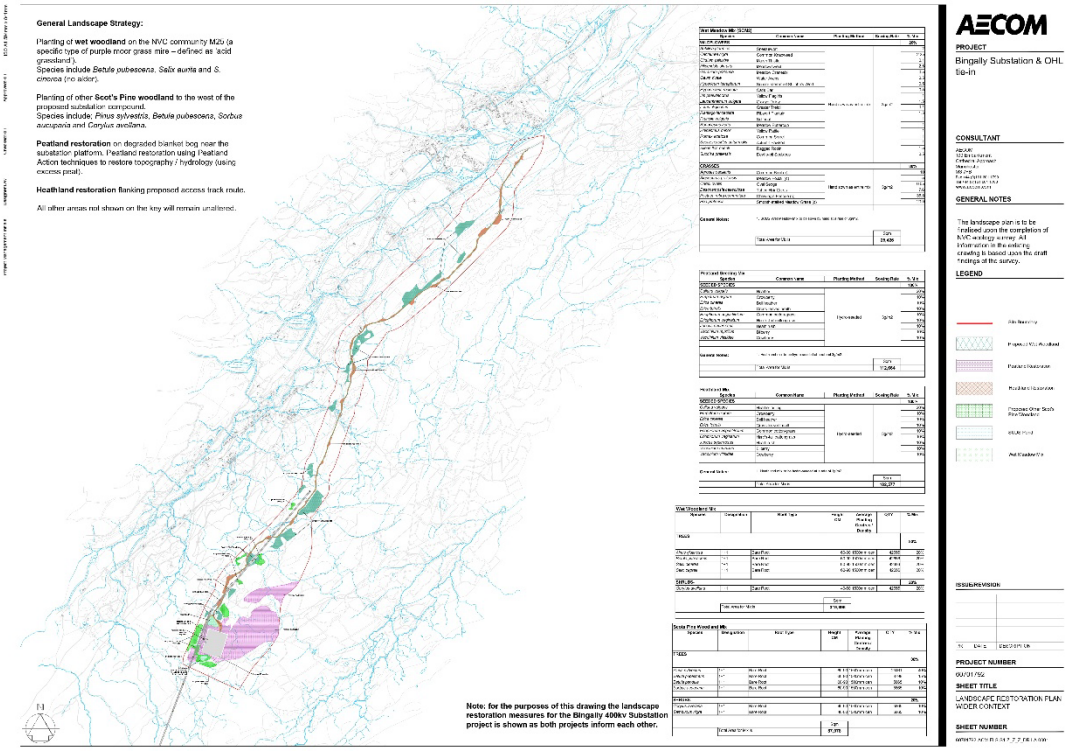


Figure 4.2 Landscape Restoration Plan Wider Context



Substation Platform

4.13 The Substation Platform is approximately 376 m (length) x 271 m (width) in size with associated earthworks and was developed based on the number of bays required for the initial connection as well as any future allowances. The substation level platform, which will be at 324 m above ordnance datum (AOD), will be created by excavating into the site's slope. Excavated material will be utilised in the creation of the platform and the surrounding earthworks. . The platform will be a flat, rectangular area, formed of crushed stone that would accommodate the electrical and built infrastructure. Several concrete foundations will be installed support the electrical equipment. Kurbed tarmac roads will be installed. See Figure 4.3 and 4.4 below for the permanent works layout and temporary works layout.

4.14 The Proposed Development would include the construction of two new SuDS basins designed to manage surface water runoff from the proposed substation site. The basins have been sized considering the area of the proposed substation site and associated earthworks, including partial run-off from the adjacent access track. The outfall from the access track further from the substation is processed separately and will not have a basin, please see Figure 4.5 and 4.6.

Figure 4.3 Permanent Works Layout

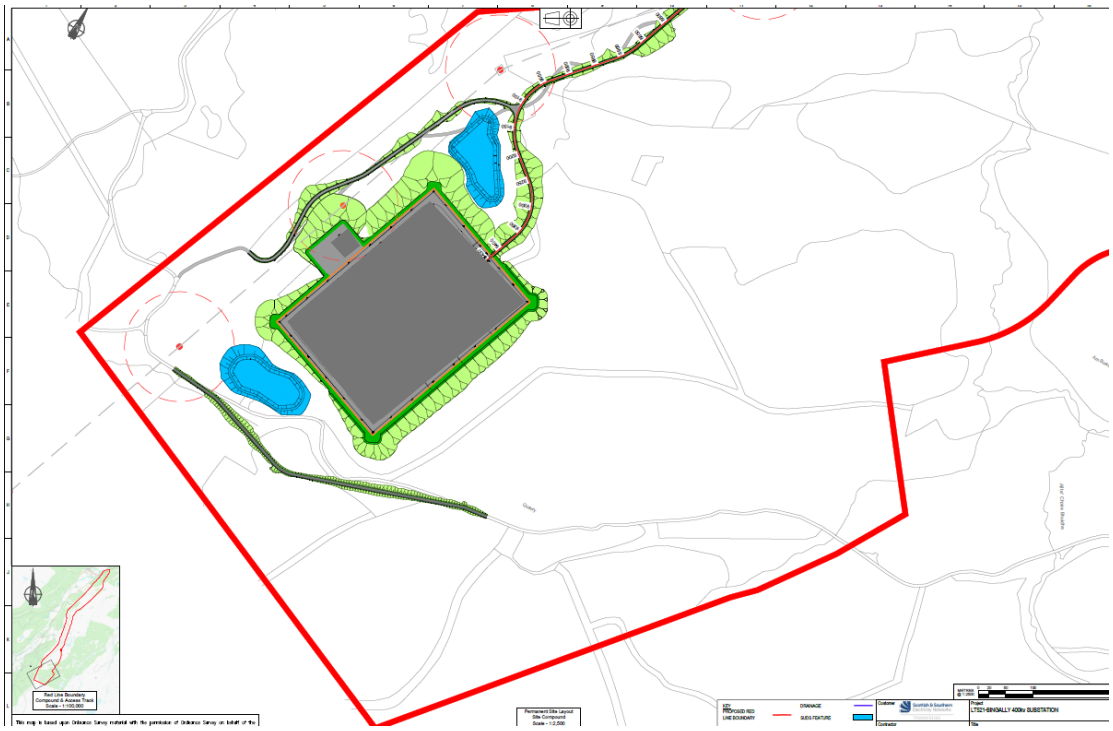


Figure 4.4 Temporary Works Layout

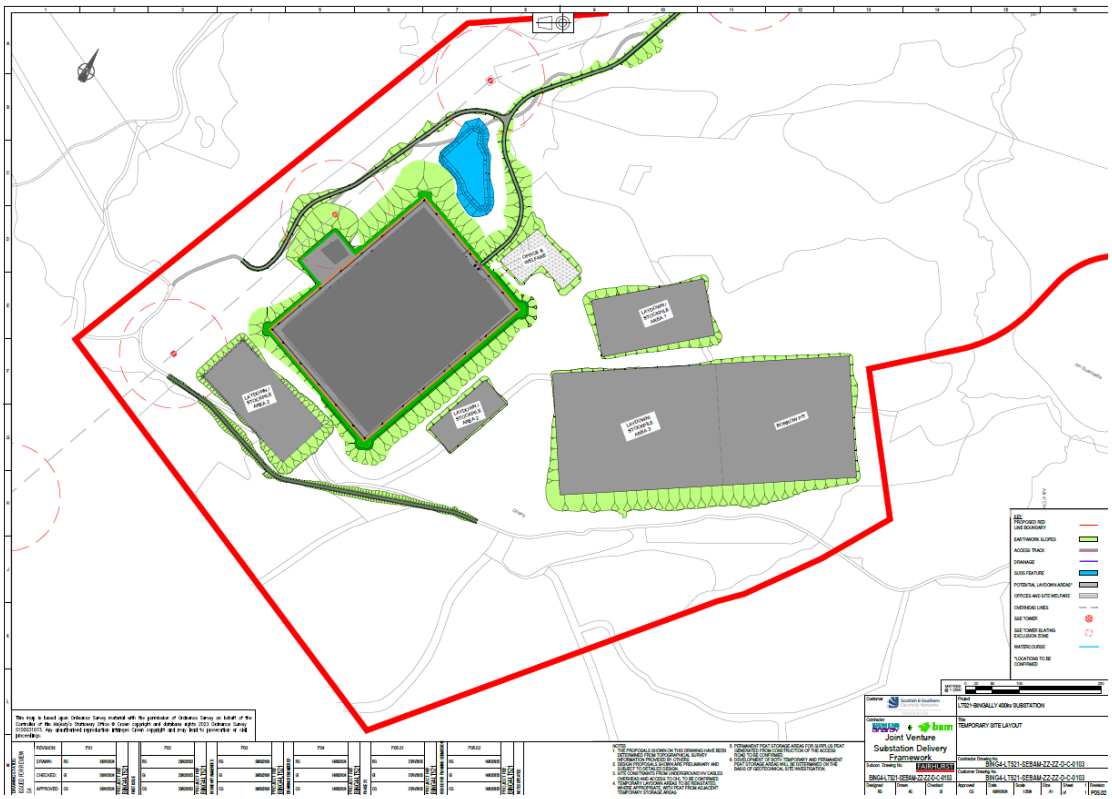


Figure 4.5 Permanent Drainage Layout

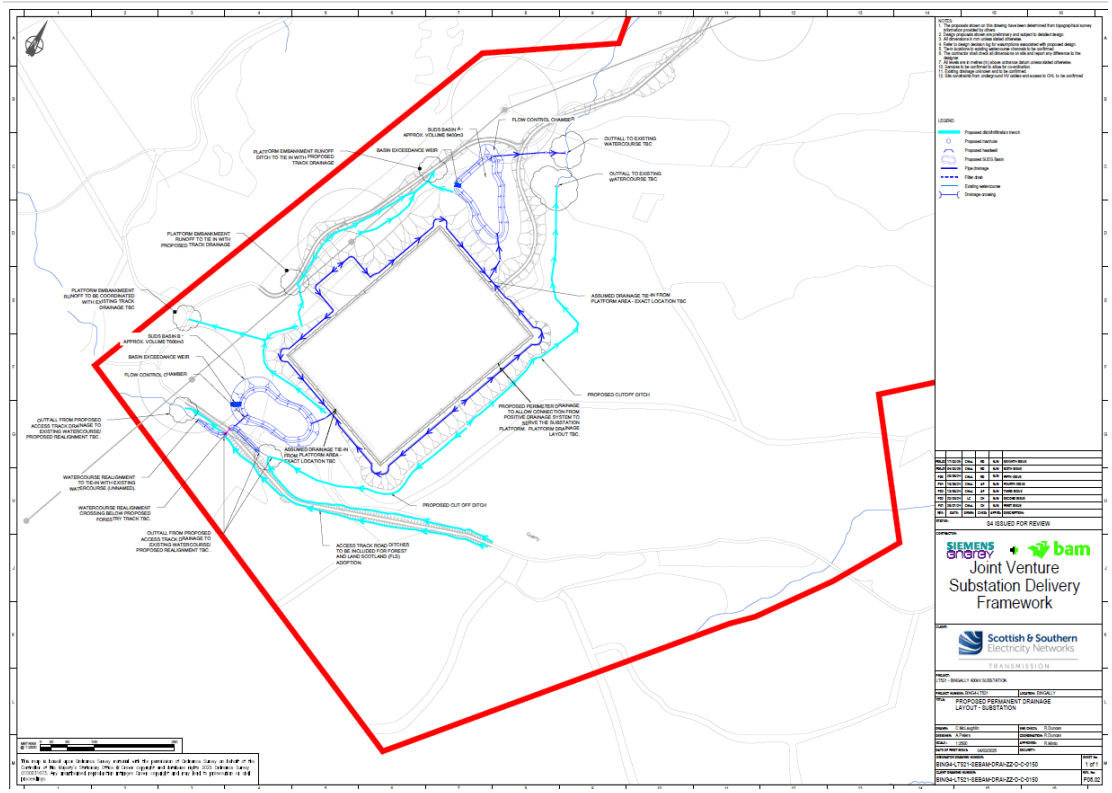
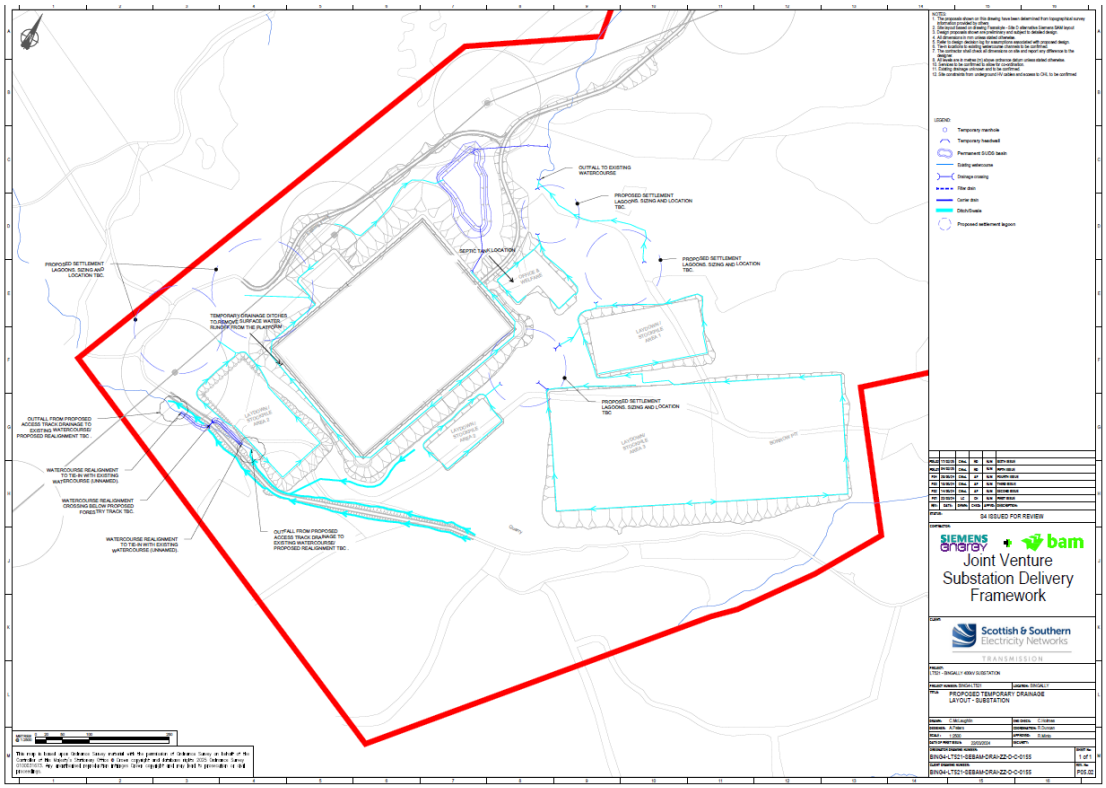


Figure 4.6 Temporary Drainage Layout



Building Design and Form

4.15 The Proposed Development comprises of an AIS substation which relies on open air components. As a result, there's only a limited requirement for buildings to be constructed. Where it is required, buildings would comprise of a steel portal frame with metal cladding and roof and to be designed to minimise visual and noise impact and increase security of supply.

4.16 The Proposed AIS substation plays a key part of the applicant's commitment and responsibilities to the decarbonisation of the electricity network, as SF6 free technology will be used throughout where feasible.

3.1 The proposed control building is designed for monitoring, controlling and protecting electrical systems and will contain equipment to operate the substation, Figure 4.7. The maximum dimensions for the control building are shown in Figures 4.8 to 4.9 and are 49 m (width) x 24 m (length) x 7 m (height). The control building will be Olive Green as show in the figures below. The control building has a separate battery room, LVAC/DC room, control room, communication room, mess room and toilet. Car parking facilities will be provided near the main entrance of this building.

Figure 4.7 3D Model of the Control Building

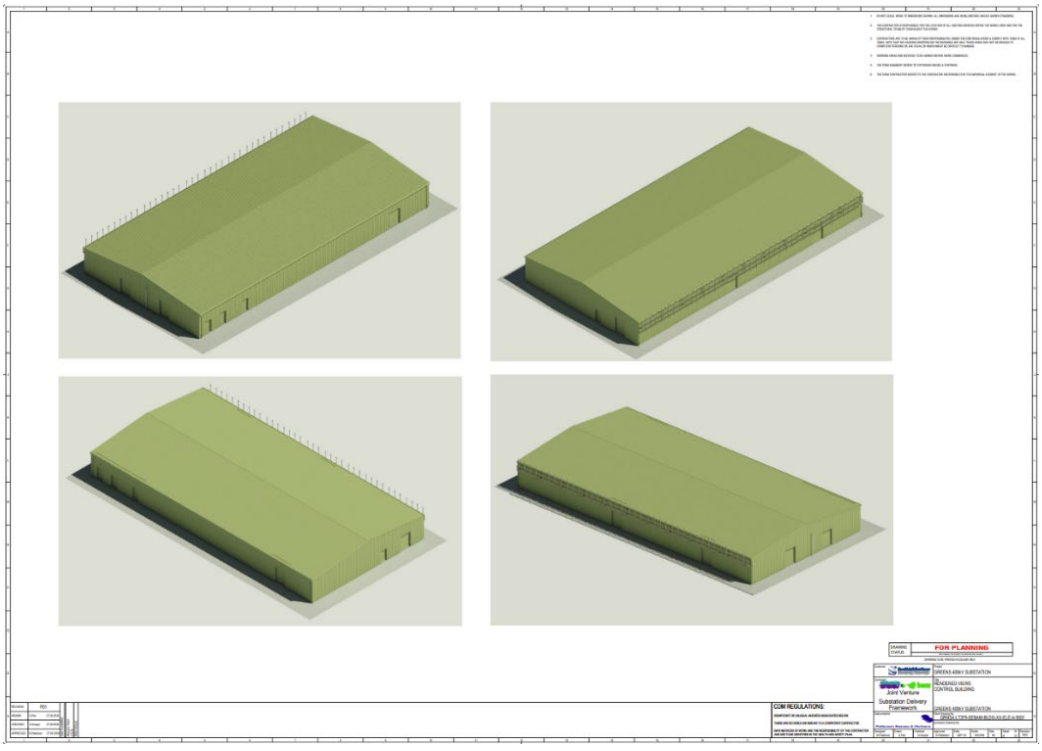


Figure 4.8 Control Building Layout Plan

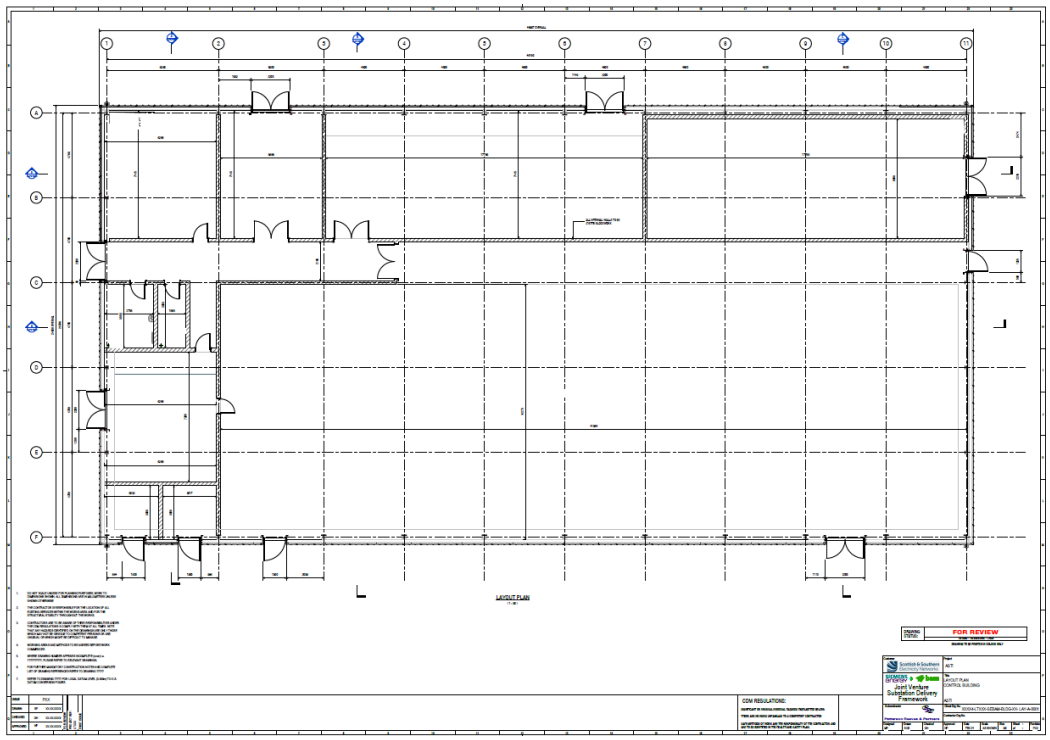
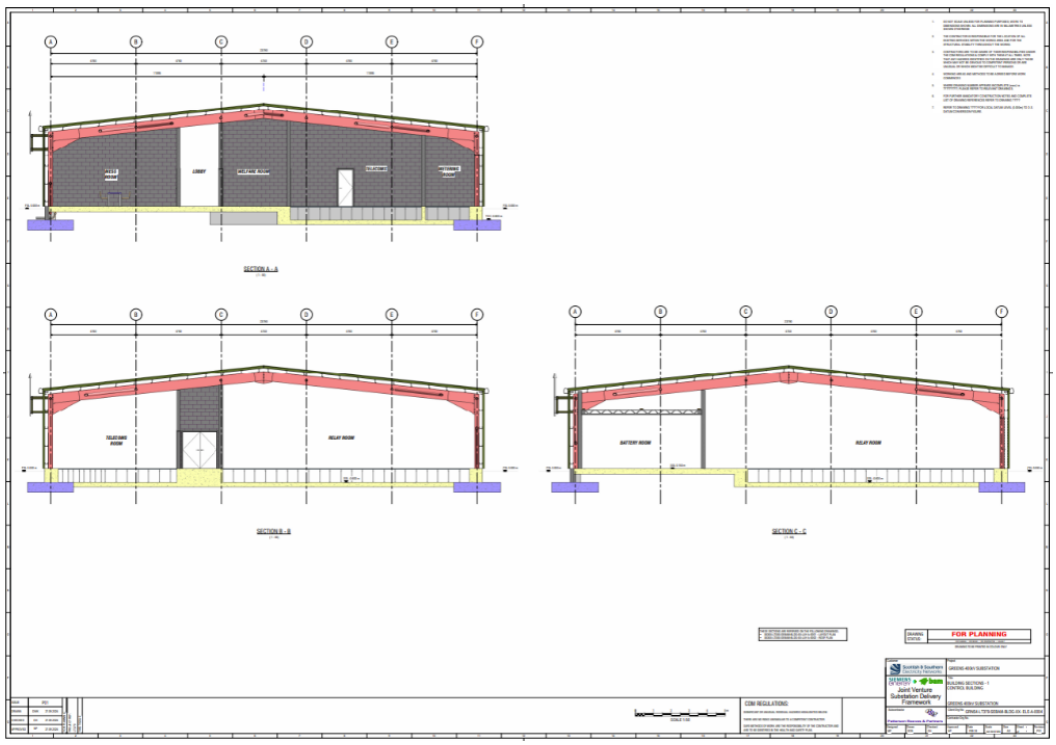


Figure 4.9 Control Building Elevations



4.17 The Switchgear and Busbar equipment will be Air Insulated, meaning the current-carrying phases are kept isolated from one another using an air gap. This is a well-established technology with a high reliability.

Temporary construction compound and welfare area

4.18 A Temporary Construction Compound and Welfare Area is required as per the Health and Safety legislation and the CDM Regulations for welfare facilities on site. The Principal Contractor (PC) will be responsible for the design and construction of hardstanding areas that obtain sufficient load-bearing capacity. If deemed necessary, a geo-textile layer will also be included within the design to facilitate effective stone removal upon the compound's dismantling.

4.19 The PC will provide a plan showing the location of the compound area which would also be displayed in the site office. This compound area will provide adequate space for the facilities listed below and parking for employees and visitors.

4.20 Facilities to be provided in the temporary Site compounds will typically include the following:

- Site office, of portacabin type construction.
- First aid facilities.
- Employee parking.
- Potable water supply.
- Bunded fuel storage area.
- Water tanker.
- Contractor lock-up facility.
- Toilets.

4.21 These temporary facilities will be removed on completion of the construction phase and the areas will be reinstated to comply with the proposed site layout plan and landscaping plan.

5. Access

5.1 A DAS is a single document combining the Design Statement which addresses the design of the development and an Access Statement which demonstrates observance of the equal opportunities' requirements. The Statement should explain and justify the accessibility of the proposals. Accessibility to major infrastructure is fundamentally different by virtue of health and safety and operational regulations, than to that of a public or commercial building. The following section provides an overview of how the site has been designed to facilitate access for maintenance and operation only, and to ensure that the site is secure from intruders. Thereafter a summary discussion on the design of site access (externally and internally) follows to complete the design approach discussion and demonstrate that accessibility has been considered relative to specific infrastructure requirements.

5.2 The Proposed Development access is designed to be accessible to all. However, for safety reasons, once the substation is operational, only authorised personnel will be allowed to access the Site for maintenance and inspection purposes only. It is assumed this would be required at regular intervals however this will be dependent on specific operational requirements. Maintenance on the bays is likely to be required annually in some form and this would require presence on Site for the duration of one week.

5.3 As mentioned above, given the nature of the Proposed Development, once operational access to the Site will be limited to authorised persons only and access by members of the public will not be permitted. As required by regulation, the Site has been designed to ensure security from all unauthorised persons including the use of palisade fencing around the platforms. The wider Site will be surrounded by a post and wire perimeter fence and would be controlled at the Site entrance by gate access, to prevent unauthorised vehicle access across the Site. Further measures of installing sensor activated lighting will also be carried out to ensure that the Site access is adequately lit when required.

5.4 The proposed construction traffic route uses the A831 between the A82 at Drumnadrochit and the proposed access track. The proposed access track would connect to the A831 where the existing track is currently located. It is proposed that HGV construction traffic would arrive at Site from the east and leave to the east. It would therefore not enter the town of Cannich. However, although unlikely, it is possible that Car / Light Goods Vehicle (LGV) traffic would use the A831 west of the proposed access track.

5.5 A new permanent access track from the A831 would be constructed to provide access to the Proposed Development. This access track would utilise existing access track (6.1 km), with the addition of an off-line section where the original Beauly-Denny OHL track was previously reinstated (approximately 3.4 km). The existing access track would require widening and the inclusion of passing places to remove any pinch points for construction vehicle access and allow the movement of abnormal loads.

5.6 Where the proposed access track crosses a waterway or watercourse, the design development has been developed to keep existing track levels where possible to minimise the requirement for any works other than culvert widening.

5.7 Temporary access tracks would be established around the proposed substation to allow for the movement of construction workers, plant, equipment and materials between the Proposed Development and the temporary construction compounds.

5.8 Overall, it is considered that the existing road network can accommodate the anticipated temporary increase in traffic generated by construction activities. There would however be temporary impacts to two Core Paths, namely the IN05.02 and IN05.03, in addition to one long-distance walking route, the Affric Kintail Way. Temporary diversions and allocated crossing points are proposed to manage access along these tracks during construction, the existing alignments will be reverted back to the original routes upon completion of the works.

Please see the Outline Access Management Plan submitted as part of the planning application for further information on the proposed mitigation.

5.9 A Construction Traffic Management Plan (CTMP) accompanies this application, which concludes that the impacts of the construction traffic on the roads leading to the Site would be kept to a minimum as long as mitigation measures are in place. This ensures the continued use of the roads by local residents and businesses. The mitigation measures proposed in the CTMP include road inspections and maintenance, as well as the use of designated delivery routes, and appropriate warning signage. Please refer to the draft CTMP for further information (EA Volume 3, Appendix K Transport Statement).

6. Conclusions

6.1 The Applicant has given careful consideration to the siting, design, layout and access of the Proposed Development to ensure it is designed sensitively within the existing infrastructure and the environment it is located in. The proposal seeks to deliver a functional development which avoids significant impacts on nearby receptors. The design has been progressed to fit sustainably into the environment in which it sits whilst satisfying technical requirements and functionality. The development seeks to deliver sustainable development via facilitating net zero targets and increased transmission of renewable energy.

6.2 A new permanent access track from the A831 would be constructed to provide access to the proposed substation site, as well as a permanent access road on site to provide access to the proposed infrastructure. Although temporary impacts will occur to public rights of way during the construction period, access will be reverted during operation of the Development on the public rights of way and along the access track. No public access is authorised into the substation platform due to the nature of the development. The design and proposed fencing reflects that requirement such that the site is designed to be secure from public access. This is in accordance with the Electricity Safety, Quality and Continuity Regulation 2002 (as amended).