Scottish & Southern Electricity Networks

TRANSMISSION

Pre-Application Consultation Report

Hurlie 400kV Substation

November 2024

Scottish & Southern Electricity Networks
TRANSMISSION

CONTENTS

1. INTRODUCTION

1.1 Purpose of this Report

1.1.1 This Pre-Application Consultation (PAC) Report is submitted by Scottish Hydro Electric Transmission plc, operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission), as part of an application for full planning permission under the Town and Country Planning (Scotland) Act 1997 (as amended) ('TCPA') for the construction and operation of a 400kV AC substation, and the associated undertaking of earthworks, the formation of platforms, landscaping, means of access, means of enclosure, site drainage, temporary construction compounds and other associated operations at Land at and in the vicinity of Fetteresso Forest, Aberdeenshire. The proposed substation is known as Hurlie substation and is located to the north-east of the existing Fetteresso substation.

1.1.2 The PAC Report is submitted as a requirement of S35C of the TCPA in accordance with requirements prescribed in the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (as amended) (The DMRs) and particularly with reference to Section 7B, which prescribes specific content for PAC Reports. The author has also consulted *Planning circular 3/2022: development management procedures*.

1.1.3 In general, the PAC Report provides an overview of the consultation programme and describes: the findings from the PAC process; the steps taken to meet statutory requirements; the feedback received during the PAC process, and how we responded.

1.2 Structure of this Report

1.2.1 The PAC Report is structured as follows:

1: Introduction;

2: Project Background – outlines the background to the project and provides a description of the key elements and non-statutory consultation undertaken;

3: The Consultation Process – describes the submission of Proposal of Application Notices (PANs); the dates and venues for consultation events; any additional consultation required by the local planning authority, and how these events were publicised;

4: Consultation feedback and our responses – summarises the written responses to consultation and the views raised at public events, as well as the number of written responses received and attendees at events; and

5: Conclusions.

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

2. PROJECT BACKGROUND

2.1.1 Scottish and Southern Electricity Networks Transmission, operating under licence held by Scottish Hydro Electric Transmission plc, owns, operates, and develops the high voltage electricity transmission system in the north of Scotland and remote islands and has a statutory duty under Schedule 9 of the Electricity Act to develop and maintain an efficient, co-ordinated and economical electrical transmission system in its licence area.

2.1.2 The Hurlie 400kV substation proposals form part of a wider programme of works known as the Kintore to Tealing 400kV projects, which also include:

- a new 400kV substation called Emmock, in Angus, which will be subject to a TCPA application;
- a new 400kV overhead line connection from Kintore, which will be subject to an application under Section 37 of the Electricity Act 1989;
- two 400kV reconductoring upgrades between Alyth and Tealing, and Tealing and Westfield, also to be subject to applications under Section 37 of the Electricity Act 1989; and
- overhead line tie-ins and temporary diversions around the proposed Emmock substation and the existing Tealing substation, subject to an application under Section 37 of the Electricity Act 1989.

2.1.3 This PAC report is submitted with reference to feedback received for the Hurlie substation proposals, which are summarised below. Consultation events, materials and feedback forms were designed with the need to delineate feedback on separate applications in mind.

2.2 Proposed Development

2.2.1 The planning application is submitted for development comprising the construction and operation of a 22 bay, 400/275 kV Air Insulated substation located on a level platform and the formation of associated earthworks, access, drainage, landscaping, security, and temporary construction compounds, in and in the vicinity of Fetteresso Forest, of Stonehaven, Aberdeenshire.

2.2.2 A full description of the proposed development can be found in Chapter 3 of the EIA Report (Volume 2) submitted with the planning application.

2.3 Requirement for Pre-application Consultation

2.3.1 Regulation 4 of the DMRs requires that pre-application consultation is carried out for all national and major developments. National and major development types are defined by the Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009 ('the Hierarchy Regulations'). All developments that are not national or major are classified as local developments and are not required to undergo pre-application consultation.

2.3.2 National development which expands the electricity transmission grid is described under 'National Development 3 Strategic Renewable Electricity Generation and Transmission Infrastructure' in the fourth National Planning Framework (NPF4). Development that falls in this category is described as National development if it would have otherwise been considered major development under the Hierarchy Regulations. Major developments are described in the Hierarchy Regulations under Regulation 2(1), and the proposed development falls under 9. *Other Development*, where the area of the site is or exceeds 2 ha.

2.3.3 The proposal is therefore classified as a National Development under the terms of the Hierarchy Regulations and NPF4.

2.4 Early Non-Statutory Consultation

2.4.1 Prior to the initiation of the formal PAC process by submitting the PAN, SSEN Transmission undertook non-statutory public consultation on the Kintore to Tealing 400kV projects in May 2023, as well as direct engagement with statutory and non-statutory consultees, community councils, elected representatives, and landowners and occupiers. This followed a two-stage site selection process which had determined a preferred site in the vicinity of Fiddes, Aberdeenshire, and the substation location at the time was referred to as Fiddes, or Site 5B as it had been referred to in the site selection documentation.

2.4.2 Public events were undertaken in relation to preferred substation locations, overhead line corridor locations in Aberdeenshire including:

- 2 May 2023 (2-7pm) Kirkton of Skene, Milne Hall
- 3 May 2023 (2-7pm) Ardoe, Ardoe House Hotel
- 4 May 2023 (2-7pm) Laurencekirk, Dickson Hall

2.4.3 Supporting this consultation was a consultation document published in May 2023, 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.

2.4.4 For members of the public who were unable to attend the face-to-face consultation events, a virtual consultation event was held on 17 May 2023 between 4pm and 6pm. The virtual consultation event was held via a virtual consultation room which provided information boards giving an overview of the project and the type of infrastructure proposed. During the virtual consultation event, a live chat function was available for members of the public to ask questions about the project.

2.4.5 The online consultation portal was retained online for the duration of the consultation period for viewers to learn about the project and were able to submit feedback forms online. A general feedback email address was established ('tkup@sse.com') for members of the public to provide written responses, which has been operational throughout the period leading up to planning submission.

2.4.6 As a result of early consultation feedback from communities, Community Councils and Local Councils, a review of the initial site selection exercise and further information on likely future connection requirements, the decision was taken to revisit and extend the site selection exercise, widening the area of search with a view to seeking alternative site options to those presented in the Consultation Document published in May 2023. New candidate sites were identified and appraised. Following detailed assessment of environmental, technical and engineering/cost factors, a new location at Hurlie, in Fetteresso Forest was selected as the proposed site option to be taken forward into the design and consenting process. This new site was confirmed and presented in the Report on Consultation that was published in December 2023 and subsequently consulted on in March 2024.

2.4.7 The early non-statutory consultation process, as well as summaries of the feedback received and SSEN Transmission's responses to that feedback are presented in the Fiddes Report on Consultation (November 2023).

2.5 Pre-application Engagement with Planning Authority and Statutory Consultees

2.5.1 Seven rounds of online engagement meetings with key stakeholders have been undertaken since December 2022. These meetings have included representatives from Aberdeenshire Council, Scottish Environment Protection Agency (SEPA), NatureScot and Historic Environment Scotland (HES), and others. These meetings have generally covered all the Kintore to Tealing 400kV project proposals, including Hurlie substation, as they have developed through the site and corridor/route selection process and as more developed proposals have

been under development. Stakeholders have had the opportunity to provide feedback at these meetings and separately in writing or in follow up phone calls.

2.5.2 Aberdeenshire Council offers a specific pre-application advice service for *large scale energy, transmission and infrastructure developments,* which SSEN Transmission requested in respect of the Hurlie substation proposals early in 2024. A pre-application meeting was held online on 25 April 2025, and included staff from Aberdeenshire Council's planning department, as well as internal consultees, and external statutory consultees. SSEN Transmission undertook a short presentation at the meeting, and attendees had an opportunity to give initial comments and ask questions. Written feedback was provided by Aberdeenshire Council on 24 May 2024, and in the intervening months has engaged via email and a follow up meeting on 27 August 2024.

3. THE CONSULTATION PROCESS

3.1.1 The statutory pre-application consultation process began with the submission of the PAN, which identified dates and locations of consultation events in respect of the proposals that were undertaken in March 2024, then in June 2024. For the purposes of providing the PAN, PAC events were identified at a single suitable location in proximity to the development site, however, for every round of consultation, multiple events in other nearby venues were carried out featuring the same information on the proposals and with the same opportunity to raise questions and provide feedback.

3.1.2 This section describes the consultation process and demonstrates how statutory PAC requirements have been met. The PAC process is specified in Section 35B of the TCPA 1997, and in Regulation 7 of the DMRs.

3.2 Proposal of Application Notice (PAN)

3.2.1 A PAN must be submitted to the Local Planning Authority (LPA), containing the information prescribed in 35B(4) of the TCPA 1997 and Regulation 6 of the DMRs, including an account of what consultation the applicant intends to undertake and information as to when such consultation is to take place, with whom and what form it will take.

3.2.2 A PAN, with covering letter and plan identifying the location of the proposals, was submitted to Aberdeenshire Council on 31 January 2024, marking the beginning of the statutory consultation period. The PAN provided the Council with an outline of the application details, dates of public events, publicity arrangements, and confirmation of the site location. A copy of the PAN and plan identifying the land is provided in **Appendix A.**

3.2.3 The PAN and attachments were also distributed via email on the same day to the following organisations and elected representatives: Mearns, Stonehaven and District, and neighbouring community councils; Mearns Ward and Stonehaven and Lower Deeside Ward, and neighbouring ward councillors; Scottish Government constituency MSPs, neighbouring constituency MSPs, and regional MSPs; Westminster MP. Full details were contained in the covering letter and are copied in **Appendix B.**

3.2.4 The PAN identified two events to take place at Drumlithie Village Hall on 19 March 2024 and 11 June 2024. Although not contained in the PAN expressly, other events were also held at Auchenblae (21 March 2024 and 10 June 2024), and elsewhere along the Kintore to Tealing OHL potential route, and advertised accordingly.

3.2.5 A letter confirming that the proposed PAC detailed in the PAN met requirements was received on 15 February 2024. Subsequently, Aberdeenshire Council requested via email dated 22 February 2024 that SSEN Transmission hold a PAC event in Stonehaven in response to community feedback. PAC events were then organised and carried out at Stonehaven Town Hall on 11 March 2024 and 13 June 2024, the second of which was an event where responses to feedback was shared.

3.3 Newspaper Notices

3.3.1 Newspaper notices were published in a newspaper circulating locally to the proposed development to publicise the PAC events described in the PAN.

3.3.2 For the first consultation event, the newspaper notice was published in the Press and Journal on 8 March 2024. For the second event, a newspaper notice was published in the Press and Journal on 31 May 2024. Care was taken to ensure that notices were published at least seven days in advance of the events and contained all of the information required by Regulation 7 of the DMRs. Copies of the notice were also made available in the online public notices that can be accessed from the newspaper's website, from the date that the notice was printed.

3.3.3 Copies of the newspaper notices are provided in **Appendix C.**

3.4 Additional Publicity of Public Events

3.4.1 In addition to the publication of the newspaper notices, the PAC events were advertised extensively to make sure residents, and local businesses were aware of them and how to find more information on the proposals.

3.4.2 Public consultation posters providing general introductory information on the proposals and advertising the planned public events were published in two newspapers on the dates identified below.

Press and Journal:

- Event 1: 4 - 8 and 11 March 2024
- Event 2: 27 May – 1 June 2024 and 3 – 8 June 2024

3.4.3 An example of these advertisements used in respect of both events in both newspapers are shown in **Appendix D.**

3.4.4 Public consultation posters were circulated to Stonehaven Community Council for sharing with the community and on their media platforms. Emails were sent directly to the elected Councillors and MSPs/MPs in the area. Copies of these emails are also shown in **Appendix D.**

3.4.5 A letter and information leaflet informing the community of the initial series of events was delivered to 81,785 households within a 10km radius of the Proposed Development on 19 February 2024. This was repeated for the second round of events via letter and information leaflet on 7 May 2024. These are both shown in **Appendix E.**

3.4.6 Information on the public events was shared on the dedicated project website.[1] A Press Release issued to all relevant press and also published on the SSEN Transmission website. [2]

3.4.7 Notification of the events was made via social media, by means of the SSEN Transmission Facebook, Instagram and X (Twitter), which can be viewed in **Appendix D.**

3.5 Public Consultation Events

First PAC event

3.5.1 The first PAC event in respect of the Hurlie substation proposals was held at Drumlithie Village Hall between 2-7pm on 19 March 2024. As noted in para 3.2.4 and 3.2.5 above, other nearby events were also held at Drumoak (20 March 2024), Auchenblae (21 March 2024) and Stonehaven (11 March 2024). All events were conducted in the same way.

3.5.2 The purpose of the first public event was to provide an opportunity for members of the public and local stakeholders to view information about the project, ask questions and provide feedback in person. The event was attended by SSEN Transmission staff as well as consultants working on the project to answer questions.

3.5.3 SSEN Transmission produced a 26-page consultation booklet in advance of the March 2024 PAC events, which was made available on the project website and in physical copy to take away which included key project details, plans and 3D visualisations, contact details, key dates, a feedback form, and information on how to provide comments online and to the project inbox. This booklet is attached as **Appendix F**. The publicised feedback period for the first public consultation event closed on the 30 April 2024.

[1] Available at: https://www.ssen-transmission.co.uk/hurlie

[2] Available at: https://www.ssen-transmission.co.uk/news/news--views/2024/5/ssen-transmission-announces-next-phase-of-public-engagement-for-pathway-to-2030-infrastructure-in-the-north-of-scotland/

3.5.4 The Applicant produced a number of additional materials to explain the proposals, including:

- Information banners consistent with the information in the consultation booklet, which can be viewed in **Appendix G;**
- Interactive 3D Visualisations, where attendees could look at a 3D model of the proposals at all angles and from a variety of distances; and
- Size A0 maps of the location, key designations, and project proposals displayed on tables.

3.5.5 Following the consultation event, SSEN Transmission issued an update on the project website thanking members of the public for attending and advised all material that had been displayed was available for download.

Second PAC event

3.5.6 The second and final PAC event in respect of the substation proposals was held at Drumlithie Village Hall between 2-7pm on 11 June 2024. As noted in para 3.2.4 and 3.2.5 above, other nearby events were also held at Auchenblae (10 June 2024) and Stonehaven (13 June 2024). All events were conducted in the same way.

3.5.7 The purpose of the final public event was to give feedback to members of the public in respect of comments received regarding the proposed development from earlier consultation, and to provide further opportunity to view information about the project, ask questions and provide feedback in person. The event was attended by SSEN Transmission staff as well as external consultants working on the project to answer questions.

3.5.8 SSEN Transmission produced a 26-page consultation booklet in advance of the June 2024 PAC events, which was made available on the project website and in printed copy to take away. It included updated project details, contact details, key dates, a summary of feedback along key themes that had been received since the first events, as well as the SSEN Transmission response to this feedback, and information on how to provide further comments. It was also used as an opportunity to share information on key changes made following the first event to substation and landscape design, the construction process, other local projects, and 3D visualisations. This booklet is attached as **Appendix H**.

3.5.9 Following feedback, the Applicant produced a six-page supplementary handout document in advance of the June 2024 PAC events on potential future developments in the area around Fetteresso forest, including wind farm connections, future upgrades to the existing Fetteresso 132kV substation, a Network Rail upgrade, and a SSEN Transmission offshore grid project. This booklet is also copied under **Appendix H.**

3.5.10 Information banners for the second PAC event are shown in **Appendix I.**

3.5.11 In response to more generalised feedback, SSEN Transmission published a number of information leaflets on topics of interest for attendees, including the following which were relevant to the substation application:

- Planning Applications under the Town and Country Planning (Scotland) Act 1997
- Electro Magnetic Fields Leaflet
- Protecting Private Water Supplies
- Pathway to 2030: Why are these projects needed?
- Delivering legacy benefits through Pathway to 2030 Projects
- Biodiversity Net Gain

3.5.12 All of these were published in May 2024 and copies were available to members of the public at consultation events following.[3] Other leaflets were produced at the same time (and since) of greater relevance to overhead lines and consent applications under Section 37 of the Electricity Act 1989.

3.5.13 As with the first event, information boards were produced consistent with the updated information in the June consultation booklet, as well as 3D visualisations, and large format maps.

3.6 Additional Steps Taken to Consultation

3.6.1 Aberdeenshire Council had responded to the PAN on 15 February 2024, confirming no additional consultation was required. In an email dated 22 February 2024, Aberdeenshire asked the Applicant to consider holding consultation events in Stonehaven, which were subsequently organised at the Stonehaven Bowling Club on 11 March 2024, and Stonehaven Town Hall on 13 June 2024.

3.6.2 Public notices were placed in respect of public events identified in the PAN, and additional publicity of all events was undertaken, in the form of newspaper advertisements, mail to local residents, social media and advising key stakeholders.

Project website and virtual consultation room

3.6.3 Consultation materials were made available online in the Documents tab of the project website, and these have been retained online at the time of planning submission. During the first round of consultation events, SSEN Transmission hosted an online virtual consultation room through the project website from 19 February 2024, in which viewers who were not able to attend an event in person could review the same information boards that were present at the consultation events. A screenshot of what the virtual consultation room looked like is in Figure 3.1 below. Attendees were able to make comments online via an online form, which was the same as the form at the back of the March 2024 consultation booklet.

Figure 3.1: Virtual consultation room for Hurlie substation proposals

Source: SSEN Transmission

[3] All of these and others can be downloaded as PDFs from: https://www.ssen-transmission.co.uk/2030faqs

4. PUBLIC RESPONSES AND KEY ISSUES

4.1 First Public Consultation Event

4.1.1 The first PAC event was held at Drumlithie Village Hall on 19 March 2024. Attendees were greeted on the way into the hall by staff at a welcome desk, where there was a voluntary sign-in register. A record was kept of the number of attendees, numbering 118 over the duration of the event. Some photos taken at the first public consultation event are shown in **Appendix J.** Events were also held at Stonehaven Bowling Club on 11 March 2024 and Auchenblae Village Hall on 21 March 2024, with 175 and 107 attending, respectively.

4.1.2 During the 6-week feedback period, which closed on 30 April 2024, we received 1,958 responses. While the majority of these relate and set out clear objections to the Kintore to Tealing 400kV OHL, we received 280 community responses which explicitly referred to the proposed substation. Responses were also received from statutory and non-statutory consultees. It is not possible to determine how many email and online responses were made by attendees at the event.

4.1.3 Email and online responses raised multiple themes. Of the 280 responses, responses raising issues relating to environmental and community impacts were recorded the most, with 54% of responses raising concerns relating to general environmental impacts, 53% referring specifically to visual impacts, and 49% concerning effects on health. No responses were made in support of the proposed substation, although several attendees at the consultation event did say they supported the transition to net zero, but not the approach to enabling it.

4.1.4 Table 1 below summarises the comments received, grouped into key themes. It also presents a summary of SSEN Transmission's response, and, where applicable, an explanation of how the prospective applicant took account of views raised during the pre-application consultation process. The contents of this table are a close copy of the Feedback table presented in the consultation booklet for the June 2024 events, attached as **Appendix H.**

Table 1: Summary Feedback from First Public Event

Theme	*Response*
General environmental impact The potential impact on the wider environment was referred to in over half of the responses.	This is a broad category and many of the specific concerns relating to landscape and visual impact, impacts on wildlife, noise, flooding and construction traffic are addressed separately. Minimising the environmental impact of the substation has been a key objective from the outset, and a major driver in the site selection process and in the eventual selection of Hurlie, following feedback to our May 2023 consultation on our original preference near Fiddes and as a result of further analysis. Compared to other options that were considered, Hurlie is favoured as having no direct impact on cultural heritage features. It is well screened with very limited visibility from nearby properties and contained within the landscape. While impacting commercial plantation, it avoids the loss of agricultural land. The forest provides habitat for red squirrel and other species, but the loss of habitat is not extensive and unlikely to impact the health of local bird and mammal communities. It is separated from properties so that noise is very unlikely to be noticeable. Additionally, the risks of flooding to the Stonehaven community will be avoided through the drainage design.

Theme	*Response*
	While not referenced specifically in the feedback, several attendees at the consultation events raised concerns about the combined impacts of the project with other projects proposed in the area and asked that we share information on other SSEN Transmission projects, even if at much earlier stages. Planned connections to Hurlie substation are listed on page 6 of the consultation booklet (June 2024). As well as assessing the cumulative impacts of the substation and the proposed 400kV overhead line, the Environmental Impact Assessment will also consider the potential for cumulative impacts arising in combination with other planned connections, where impacts are anticipated. The same is true of other projects in the local area which are summarised on pages 21-23 of the consultation booklet (June 2024), and the cumulative impact assessment will consider the effects of the substation in combination with other planned developments where they may be combined impacts on receptors over time, and subject to sufficient information on those projects at the time the Environmental Impact Assessment Report is prepared.
Noise While many responses highlighted concerns about the general environmental impact of the proposed substation, several attendees and respondents raised the specific issue of noise, from both the proposed substation and in combination with the proposed overhead line.	The site is already well screened with limited potential for direct lines of sight where noise could be greatest. The nature of the groundcover in the area and its undulating topography will significantly reduce noise exposure to nearby properties. Nevertheless, we are committed to making sure that noise levels experienced by local residents will be no greater than they are today. Specialist acoustic consultants have been appointed to carry out a Noise and Vibration Impact Assessment which will predict the levels of noise during construction and once the proposed substation is commissioned and under load, and which will also take into account noise from the proposed overhead line which can be audible in certain weather conditions. Should the assessment suggest that noise will be noticeable at nearby properties, the source of noise will be enclosed and if necessary other measures such as barriers and screens will be incorporated into the design to attenuate noise.
Flooding Several attendees at the event highlighted the issue of flooding in Stonehaven and were concerned that the proposed substation would increase the risk.	The proposed substation site sits in the upper catchment of the Cowie Burn, in between the Burn of Day and the head of the Burn of Baulks. It will be a condition of any planning consent that a drainage system is established which will intercept and slow drainage from the substation site. Run off will be reduced at source by the outset by ensuring a permeable substation platform and establishing large areas of natural vegetation which will intercept run off. The drainage design will ensure that the rate and volume of surface drainage across the site is no greater than it is at present. An initial Flood Risk Assessment has been undertaken and established that there is no material flood risks associated with the burns in the vicinity of the site. This work will continue, and a full Flood Risk Assessment will be presented in the Environmental Impact Assessment together with any mitigation should it be required.

Theme	*Response*
Construction traffic Several attendees and respondents raised concerns about the level of construction traffic coming through west Stonehaven and the impact on pedestrians and other road users. Several attendees pointed out the constraints on Slug Road.	We recognise that construction traffic can be a significant concern to other road users and the wider community, in terms of safety, noise and dust. While we are yet to finalise our assessment, we are examining the feasibility of routing construction traffic from both north and south via the A90 AWPR (Aberdeen Western Peripheral Route), the B9077 Peterculter to Crathes, and from Crathes, via the A957; the intention being to avoid or substantially minimise traffic through west Stonehaven. Peak movements will occur during site establishment when the Contractor is bringing plant and equipment to site. This phase is likely to continue for 12 months. Some deliveries of hardcore will be required at the start to surface the construction compound. A Construction Traffic Management Plan will be one of the many requirements of any planning permission. This will prescribe the routes to be taken by contractors and may restrict the use of some local roads in addition to when deliveries can be made. It would also likely define requirements to undertake repairs in the event of damage to road surfaces, culverts, ditches and verges. A Community Liaison Group would be established by the Contractor to provide a forum to ensure traffic impacts are minimised.
Visual impact Many attendees and respondents are concerned about the impact the proposed substation will have on views from their properties. Concerns about visual impact accounted for 53% of all the issues raised by respondents.	Since our last consultation event, together with our engineering and environmental consultants, we have been examining how we can reduce the scale of the proposed substation platform (which would house the new electrical infrastructure). As a result of detailed assessments, we now plan to reduce the platform length from 760m to 685m; the width is likely to remain the same currently at 300m, although further design work is on-going and will continue after the submission of the planning application to reduce the scale of the project further. Apart from the terminal connection towers which will be between 40m and 60m in height, the overall height of the electrical infrastructure will be approximately 14m; with the possibility that a single plant component may be 18m tall, although the need has not been determined. The benefit of the Hurlie site is that it is well screened. The indicative landscape design shown on page 18 of the consultation booklet (June 2024) provides further detail on the nature and extent of new woodland planting which will aim to screen visibility further. It is expected that the landscape plan will be secured as a condition of the planning consent, and the site development will be phased to retain existing trees around the perimeter of the site and to enhance visual screens as material is excavated. The potential impacts of the project on the wider landscape and on visual amenity will be assessed fully in the Environmental Impact Assessment Report that will accompany the planning application.
Health and wellbeing The impact of the substation and of the wider overall project on health and mental wellbeing was	We are mindful of the uncertainty that our proposals can pose to communities who may be affected. Our process for project development seeks to identify options that provide an appropriate balance across a variety of considerations and interests. We aim to do this as swiftly as possible to minimise the duration of uncertainly for affected communities.

Theme	*Response*
raised by several attendees at the consultation events and in just under half of all responses received.	However, we are also committed to providing sufficient time and opportunity for all stakeholders to feed into each stage of our project development process, so that views can be understood and wherever possible incorporated into design decisions. This is a balance which has to be carefully managed. We understand that everyone may be impacted in different ways and would be interested in residents' views regarding any additional activities that would help to address their specific concerns. Our responses to these topics can be found at **ssen-transmission.co.uk/2030faqs** Our statement on Electric Magnetic Fields (EMFs) can also be found here **ssen-transmission.co.uk/emf**
Wildlife A number of respondents questioned the impact the proposed development would have on wildlife	A key driver in the site selection process was to avoid sites which could impact legally protected and locally designated wildlife sites and avoid land with a rich biodiversity. While the site is currently commercial plantation, there are pockets of natural habitat. We are aware that there are frequent sightings of red squirrel in Fetteresso forest. Extensive ecological and ornithological surveys of the site and surroundings have been completed to characterise habitats present and to assess and record the likely presence of key species. These will inform the detailed mitigation plans and impact assessments which will be undertaken as part of the Environmental Impact Assessment. In addition to the mitigation requirements determined through the impact assessments, we have a companywide commitment to deliver a 10% gain in biodiversity across our major projects. This will be integrated into the proposed development, specifying a diverse range of new wildflower, shrub and tree planting as part of the landscape design. In addition, we are required to compensate for any woodland removal, including of commercial plantation, by securing opportunities for compensatory new planting to ensure no net reduction of woodland.
Property values Several attendees at the event expressed concern about the effect of the proposed substation on the values of their homes and their ability to sell, should they wish to.	We understand that there are concerns about the potential impact of our proposed developments on properties within the vicinity of our proposed overhead line alignments and substations sites. Throughout the development of our proposals at Hurlie, we have engaged with property owners and listened to their concerns on this issue. We will look to mitigate impacts on residential properties as far as possible and these impacts will be assessed as part of the Environmental Impact Assessment. We have carried out extensive surveys at identified receptors, including selected residential properties so that we are able to model potential impacts on the wider area. Concerns in relation to impacts on property are being noted by our team. However, as a regulated business, we are obliged to follow a statutory legal framework under the Electricity Act 1989 and Land Compensation Act 1961. For those 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. Further information is available here ssen-transmission.co.uk/landowners-and-occupiers

Theme	*Response*
Socio-economic impacts Several respondents raised the potential impact of the proposed development on the community and local economy, with the issue referenced in 31% of all responses. As part of wider concerns, specific mention was made to the impact on local tourism businesses.	We are in the process of establishing a Community Benefit Fund which will enable us to work directly with local communities to support initiatives across northern and eastern Scotland. We want to give back to the communities hosting our transmission network and to help fund projects that can leave a lasting, positive legacy in those areas. In terms of broader community benefits, our Pathway to 2030 projects will boost the economy, and support local jobs and businesses. Recent studies show our Pathway to 2030 programme could contribute over £6 billion to the UK's economy, support 20,000 jobs across the UK and benefit Scotland by around £2.5 billion, supporting 9,000 Scottish jobs. We typically hold 'Meet the Buyer' events prior to the construction phase to connect our Principal Contractors with local businesses and this has proven to be an effective means of sharing the economic benefits of our projects with local communities. We are also actively seeking opportunities to accommodate our workers in a way that provides a range of local benefits. We have prepared an information pamphlet which describes the benefits we anticipate from our projects and our thinking on how community benefit funding might work. Further information on our proposals is available here: ssen-transmission.co.uk/legacy-benefits
Amenity Respondents raised concerns about the impact of the project on amenity, citing specific concerns on the project's impact on the network of footpaths and cycle routes through the Forest, and the communities enjoyment of them for recreation and health.	In selecting the best site for the substation, we have sought to balance a range of engineering and technical considerations alongside environmental issues, including landscape and visual, ecology and hydrology together with amenity. While disruption to a number of existing forest tracks which are also used for recreation will occur during the construction phase, the construction access routes created will be retained after construction and will be connected to the existing network of tracks, increasing the availability and choice of cycle and walking routes once construction is complete. It may be necessary to temporarily close or divert some tracks during the construction, in much the same way as forestry operations do at present. Where this is the case, these will be advertised and sign-posted. The Contractor will establish a Community Liaison Group which will be a vehicle to inform and discuss track and road interruptions so that impacts to the community are minimised.
Cost and benefits The issue of costs was mentioned in 27% of the responses received. In most of these cases, attendees and respondents challenged the cost-benefit analysis of the project arguing that project decisions have been based on the cheapest options.	The cost of improving the electricity network is covered by GB consumers. As with the two other Transmission license holders, we have a legal duty to balance cost with environmental, technical and societal factors. We carry out cost-benefit analysis on all projects, and the lowest cost is not always selected. Minimising environmental impact or ensuring technical viability may sometimes outweigh cost factors. At Hurlie for example, the engineering challenges are larger than those at other sites considered, but the environmental and community issues are less constraining. As a regulated business, SSEN Transmission's return on investment is determined by Ofgem's regulations, irrespective of technology choices made.

Theme	*Response*
Consultation process The consultation process adopted was raised in 26% of the responses, a common point being that insufficient information was provided and insufficient time given to communities to respond. Many respondents questioned their ability to influence the project, expressing the opinion that the decision to proceed was already made. Concerns were raised at the absence of consultation by the ESO in defining future energy needs, and how they should be met and the rationale for the wider project	We are committed to meaningful and constructive engagement with local communities and residents throughout the development process to seek input and feedback into our proposals. As we consult and develop our projects, we aim to be open and transparent with communities, engaging as early as possible to seek input into our early plans. We share our plans in different formats and through different channels and are continuing seeking ways to improve how we share information and seek inputs. We aim to engage as early as possible with the communities where we may have an impact. Our initial engagement in May 2023 aimed to introduce the need for and suggested location of the substation and wider project and explain the rationale for selecting the site. Our Report on Consultation in December 2023 presented our analysis of the feedback to that consultation, specifically the suggestion of Hurlie as an alternative in direct response to consultation feedback. Our formal consultation event in March this year summarised the process followed to select Hurlie and presented our proposals at that stage. We have continued to progress our design and resolve areas of community and environmental impact in the process. Our aims at this point are to share our latest designs, show how they have aimed to address feedback and highlight where design work may continue as we prepare for our planning application. It will be for Aberdeenshire Council to determine how the substation project will proceed. We have prepared a separate handout which explains how the need for the Project has been determined and the role of the ESO which is available here: ssen-transmission.co.uk/2030-need
Future connections While not a widespread concern in written responses, many attending the consultation events sought clarity on other developments connecting into the proposed substation.	Further information is provided on pages 22 and 23 of the consultation booklet (June 2024) where we set out possible future connection requirements, based on known development proposals, noting that all will be subject to separate consenting processes

4.2 Second Public Consultation Event

4.2.1 The second public consultation event took place on the 11 June 2024 at Drumlithie Village Hall. Identical events were also held at Auchenblae Village Hall on 10 June and Stonehaven Town Hall on 13 June 2024.

4.2.2 The purpose of the event was to share project information and provide a summary of the feedback that had been received following the first event in March and respond to the points made. It was also used as an opportunity to share information on key changes made following the first event to substation and landscape design, the construction process, other local projects, and 3D visualisations. All of this information was also summarised in the June 2024 consultation booklet available at the event and on the project website.

4.2.3 Further comments were invited at the second event and instructions were given as to how to provide comments at the event, in the consultation booklet, and on the project webpage.

4.2.4 Attendees were greeted on the way into the hall by staff at a welcome desk, where there was a voluntary sign-in register. A record was kept of the number of attendees, numbering 32 over the duration of the Drumlithie event. There were 40 attendants at the Auchenblae event and 99 attendants at the Stonehaven event.

4.2.5 The feedback period closed after a second six-week consultation period on 23 July 2024, and 55 written responses were received. Some photos taken at the second public consultation event are shown in **Appendix K.**

4.2.6 Table 2 below summarises the comments received, grouped into themes, and SSEN Transmission's response.

Table 2: Summary Feedback from Final Public Event

Theme	*Response*
Environmental Impact A significant number of respondents express strong objections to the proposed new substation at Hurlie and associated infrastructure developments due to potential environmental and ecological damage. Concerns include loss of habitat, negative impacts on biodiversity, birds, animals, and the overall quality of the local environment. The cumulative effect of the substation alongside other developments, such as the electrification of the East Coast line and connections to windfarms, is highlighted as transforming the area into an industrial estate, detracting from the rural countryside.	As set out in Table 1, minimising the environmental impact of the substation has been a key objective from the outset. Indeed, it was the principal driver leading to the selection of the Hurlie site over the site first put forward at Nether Craighill, near Fiddes, and has continued as a major driver through the design process explained in Volume 2, Chapter 3 of the EIA Report. The potential for environmental impact has been assessed by independent specialists and reported in the EIA Report. No significant effects have been predicted apart from on the landscape character of the Site and surrounding landscape and on certain local views (<4km) from the northeast, east and southeast. No significant impacts on cultural heritage assets, habitats, key species, the water environment, road users and from noise have been predicted. The Proposed Development will result in a net improvement in biodiversity. Further, the EIA Report demonstrates that, based on available information, no significant cumulative effects are predicted apart from on landscape character and certain views when considering the Proposed Development in combination with the proposed Kintore to Tealing 400kV OHL and other SSEN Transmission and third party developments within Fetteresso Forest and those to the east and southeast of the Proposed Development. There is limited potential for significant cumulative visual effects with the Fetteresso Wind Farm grid connection due to the limited visibility of this development.
Flood Risk Many submissions raise concerns about the increased flood risk to Stonehaven as a result of the proposed substation at Hurlie. Respondents fear that the development could	Table 1 explains how the Proposed Development has been designed to ensure regulations avoiding increasing flood risks will be ensured. The EIA Report has included an independent hydrology assessment which has mapped the extent of flooding in the Burns of Baulk and Day and demonstrated that the Proposed Development will not increase flooding of these burns nor the Cowie Water into which they drain.

Theme	*Response*
exacerbate existing flood issues, potentially leading to river pollution and affecting the safety and well-being of local residents.	
Noise Concerns over noise pollution are frequently mentioned, with respondents worried about the impact on local residents' living conditions. The potential for increased noise levels due to the substation and associated infrastructure developments is seen as detrimental to the quality of life and well-being of the community.	The EIA Report presents the results of baseline noise monitoring at receptors in the vicinity of the Proposed Development identified as potentially vulnerable to increases in noise. The Report also presents the predicted levels of noise during construction and when operational, and has demonstrated that no significant effects will be experienced at receptors as a result of the Proposed Development and when considered in combination with other developments considered in the cumulative effects assessment.
Health Some feedback includes concerns over health implications related to the substation and overhead line projects. Issues such as potential water contamination and the proximity of new pylon lines to residential areas are cited as risks to the health and safety of local residents.	Pollution from the Proposed Development is prohibited in law. The EIA Report includes assessments of the possible effects of noise and the risks to water resources. Both assessments detail the measures that will be taken, both as a condition of the Principal Contract and likely planning conditions, to ensure that noise impacts on local residents are avoided and that the likelihood of pollution during construction and operation is kept to an absolute minimum. The Report includes a separate assessment demonstrating that the Proposed Development poses no risk to private water supplies in the area. The UK has a carefully thought-out set of policies for managing EMFs, which includes both numerical exposure guidelines to protect against established, acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. These exposure limits have been set by an independent authoritative scientific body who carefully review all science around magnetic fields and health. After decades of research into EMF and health there are no established health effects below the exposure limits. Our design must demonstrate how these exposure thresholds and policies have been taken into account and how human health will be safeguarded, both through the planning process and the subsequent certification of the Proposed Development which is required before it can become operational.
Lack of Transparency and Consultation	As we explain in Table 1, we are committed to meaningful and constructive engagement with local communities and residents to seek input which

Theme	*Response*
A common theme among the feedback is dissatisfaction with the consultation process and perceived lack of transparency from SSEN. Respondents criticize the company for not genuinely engaging with the community, providing misleading information, and failing to consider or communicate alternative solutions. The necessity of the project is questioned in light of recent government policy changes	helps inform the development of our projects. Throughout the evolution of this project, we have sought to provide clear information, consistently and to demonstrate how we have taken feedback into account. The nature of developing major infrastructure is to balance different, often competing interests. Sometimes, this can appear that feedback has been ignored. This is never the case, but a balance of environmental, community, technical and cost considerations must be found. We remain committed to meaningful and constructive dialogue as the project progresses and will continue to seek community input at all stages during and after the determination of the planning application. The need for the Proposed Development has been set out since the earliest consultation events in 2023.
Visual Impact and Landscape Concerns about the visual impact of the substation and associated infrastructure on Scotland's landscape are highlighted. Respondents object to the industrialization of rural areas, the potential destruction of farmland and wildlife habitat, and the overall negative effect on the beauty and character of the local environment.	An independent landscape and visual assessment is presented as part of the EIA Report. While the Proposed Development is not located within areas designated for the landscape value, the landscape character of the Site is considered of medium/high sensitivity; views considered as part of the assessment from the northeast, east and southeast are considered of medium sensitivity. The assessment has predicted that major (significant) effects would occur on the Site landscape and moderate (significant) effects on the two landscape character types. Impacts on views would in most cases be insignificant apart from views from Hillhead of Auquhirie, the Hill of Swanley, and from recreational tracks at Upper Baulk, Hill of Trusta and Garrison Hill. Cumulative impacts are predicted to be similar.
Exploration of Alternatives Several respondents suggest exploring less damaging alternatives to the proposed substation and overhead line projects. Recommendations include considering subsea cabling and undergrounding options to minimize environmental impact and preserve the landscape. The need for a coherent plan that aligns with the UK's changing	The need for the Proposed Development, which has been explained in various consultation materials, is to facilitate the transfer of the many GW of power being generated in the north east of Scotland and off the north east coast as part of the wider investment in UK transmission infrastructure, on and offshore, necessary to deliver on the UK's commitment towards net zero. This need defines the physical size of the new substation required. The choice of the Site at Hurlie is the culmination of an extensive site selection exercise, set out in a Consultation Document published in May 2023, which involved the initial identification of candidate sites in the vicinity of Fiddes, and the identification of more candidate sites across a wider search area. The selection of the Hurlie Site represents the culmination of a rigorous process which has sought to balance engineering and environmental

Theme	*Response*
energy policies is emphasized.	factors to identify a site which is developable in technical terms and consentable from an environmental, planning, and economic development policy perspective, taking into account national and local environmental and planning regulations and legislation.
Supportive Feedback A minority of feedback expresses support for the Hurlie substation project, highlighting the minimal expected impact on the local environment and potential benefits for biodiversity in Fetteresso Forest. The scale of the project is described as not excessive, with minimal concerns about noise pollution.	The feedback is acknowledged and demonstrates how the selection of the Site at Hurlie is a positive response to feedback on the initial selection of the site south of Fiddes.

4.3 Overview of key design changes in response to feedback

4.3.1 An overview of key design changes made in response to feedback between the PAC 1 and PAC 2 event is presented here and was shared in the consultation booklet produced for the PAC 2 event.

Substation Design

Since our last consultation, we have refined the substation design by reducing its length from 760m to 685m, narrowing the western edge, and rounding the north east corner. We have substantially reduced the cut at the south western end, which has allowed the eastern toe of the platform to be significantly reduced in extent. As a result we have been able to reduce the overall footprint of the works area from approx. 45ha to just under 24.5ha, a reduction of some 58%. This has allowed us to increase new planting by an equivalent extent.

Over the coming weeks, we will continue to test different platform elevations, and orientations, as we seek to optimise the extent of cut, the requirement for fill, the overall footprint and the degree of visibility.

We have rationalised and shortened the internal access tracks, removing the “hairpin” from the westernmost track, and added a new section of track which skirts around the south east corner of the platform before it joins the existing forestry track east of the platform.

No changes to the proposed access arrangements from the A957 are proposed at this stage. Our thinking on access to the site has evolved however and is described in the construction section on page 19.

Landscape and Drainage Design

The reduction of the platform toe has allowed the SuDS (Sustainable Urban Drainage) ponds to be repositioned and reprofiled to a more naturalistic shape more sympathetic to the landscape design. Modifying the site access road west of the platform enables the areas of new woodland block and

shrub/scrub planting to be extended. The shrub/scrub planting would now extend further south and along the southern edge of the substation.

The shrub/scrub planting corridor beneath the proposed overhead line connections has been widened in both cases, due to the requirement to limit tree planting beneath the overhead lines. A key change, which results from shortening the platform and the toe, is that it significantly extends the area of new planting eastwards. Of note, the western, north and eastern edges of the platform would now be wrapped in woodland block planting, comprising a mix of deciduous and evergreen species, which will add both biodiversity and strengthen visual screening to what is already a well screened platform as a result of the topography of the site.

The wildflower meadow and wetland habitat around the SuDS ponds would be largely unchanged.

As indicated above, SSEN Transmission has a policy commitment to deliver 10% more biodiversity compared to the baseline condition. At Hurlie, while the site is predominantly immature and mature plantation, there are some pockets of semi natural and natural habitat.

Our biodiversity net gain (BNG) proposals are being developed, but the principal delivery will be through the landscape plan and the diversity of habitat and species mixes that will be delivered as part of the Plan.

Separate and in addition, we are committed to replace all woodland removed as part of our projects. We will therefore ensure that we provide compensatory planting, i.e., at least the equivalent extent of woodland removed. Our proposals for this will be agreed with the landowner.

5. CONCLUSIONS

5.1.1 This PAC Report documents the pre-application consultation process undertaken in respect of SSEN Transmission's proposals for the Hurlie 400kV substation, which are now the subject of a planning application to Aberdeenshire Council. In preparing this PAC Report we have made reference to the requirements of Regulation 7B of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (as amended) and *Planning circular 3/2022: development management procedures*.

5.1.2 A Proposal of Application Notice with attachments was submitted to Aberdeenshire Council on 31 January 2024 and sent to local community councils and consultees. Public notices and publicity by other means was carried out to advise members of the public on the dates and locations of the events, where to find more information and how to respond.

5.1.3 Information in respect of both events was compiled by the project team and made available at the events themselves and online, including two consultation booklets (March and June 2024), information boards, large format plans, 3D visualisations, and information leaflets on various topics. In respect of the first event, a virtual consultation room was made available via the project webpage featuring the same information boards as the in-person public event.

5.1.4 The first public consultation event was held at Drumlithie Village Hall, on 19 March 2024, and a final consultation event at the same venue on 11 June 2024. Other identical public consultation events near to the proposed development site were held in respect of both rounds of consultation at Auchenblae and Stonehaven. Consultation periods in which the public and consultees could make comments were open for six weeks following each round of consultation.

5.1.5 The consultation was designed to facilitate engagement with the local community, community councils, statutory authorities and local leadership, and to invite feedback on the Proposed Development. Public and consultee feedback on the proposals, as well as the SSEN Transmission response to this feedback, made following the first public event were summarised and presented on information boards at the second public event and in the June 2024 consultation booklet.

5.1.6 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 Hurlie 400kV substation planning application.