Scottish & Southern Electricity Networks

# Fanellan Hub 400 kV Substation and Converter Station Environmental Impact Assessment Report Volume 4 | Technical Appendices

## Appendix 6.2 – Pre-Application Advice

February 2025

| THC Design Workshop Meeting Note | |
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| Description of development | 23/04003/PREMAJ - New Beauly area 400kV substation and HVDC converter station and associated Overhead Lines |
| Date of Workshop | 13/3/23 |

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| Where are the key design viewpoints / receptors in the surrounding area | • 13 VPs have been agreed with THC's Landscape Officer, however no wireframes or 3D model was available to review this and confirm what are the key design viewpoints.<br><br>• Based on the information shared at the meeting, including an indicative site layout, site section drawings and one visual presented from c.55m above Kiltarlity, it was challenging to determine how much of the development would be visible from the surrounding areas.<br><br>• The ZTV mapping produced indicated widespread bare earth visibility, however, this would not be the case and a further ZTVs were advised to be included:<br>1) to show visibility with the retention of native woodland in the study area which is not plantation woodland; and<br>2) a ZTV showing visibility above the height of the open air infrastructure on site to hopefully demonstrate where the upper sections of buildings and OHL towers would be visible with much of the lower site infrastructure not being visible.<br><br>• Forestry management plans for all surrounding commercial woodland should also be studied with consideration being given to the applicant obtaining control over any areas of woodland where this is required to be retained / managed / restocked to ensure the successful visual integration of the proposal.<br><br>• When undertaking the baseline photography, the need for micrositing was emphasised with the photographer having a 3D model of the scheme to ensure that photography is taken where there would be clear visibility of the proposal (i.e. not behind any roadside vegetation) and this should be taken when the intervening trees are not in full leaf. It would be helpful to have a photo of the tripod location where each VP has been sited, particularly if there is no clear view towards the site and 3D modelling / wireframes will be needed rather than a photomontage for select VPs.<br><br>• The LVIA should carefully consider the upper elevation and roof treatment, including materials and colour, of the proposed buildings, ensuring that these elements are free from clutter, and are fit to be seen, are kept as low as possible, with avoidance of hard edges with building and rooflines to be rounded wherever possible, with the operational site lighting to be kept to an absolute minimum. |

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| What are the other constraints on the site which have significantly driven the layout | • The decision to proceed with the HVDC building's location on the new substation site, rather than within the existing quarry was again questioned. It was explained that the decision to not co-locate this within the quarry must be clearly justified within the EIA alternatives chapter.<br><br>• The selected site also requires a considerable amount of cut and full, with it being explained that this material would remain on site and used to form new screening landforms wrapping around the south of the substation. This cut and fill approach can be supported, and the naturalistic form of the landforms welcomed, however, it was questioned how this engineered site level had been arrived at and if there was scope to lower the platform level further.<br><br>• The Council's expectation is for as much of the proposed landscaping landform around the development to be tree planted. This is essential to help screen the development, in combination with appropriate planting elsewhere within the site, and respecting the existing characteristics of woodland cover and open space in the surrounding area and the nearby presence of the Beaufort Castle Designed Landscape.<br><br>• The internal site configuration should also be explored in the EIA, to see it the highest buildings are located in the correct location, or if these could be stepped further down within the site.<br><br>• The concentration of the number of proposed OHL towers was also raised a concern, with this changing from 2 towers being on site to circa 10 towers. The close spacing of these, and any scope to underground these, should be reviewed, as should their height, with scope for the LVIA to consider micrositing of towers in key design views. |
| Other Key issues identified | • The loss of woodland arising from the SUDS design needs to be clarified with tree protection measures and any management felling to create a windfirm edge requires to be set out in the submission, together with full details of the compensation plan.<br><br>• SEPA are unlikely to have any concerns re flood risk, but the culverting for land gain for both the SUDS ponds (possibly 100m) and the proposed new access road (possibly over 300m) is of concern. SEPA are likely to object to these elements unless the SUDS ponds and access road locations can be modified and/or water course diversions are put in place. SEPA did find it concerning that addressing impact on the existing water environment did not appear on any of the presentation material.<br><br>• The decision to form a new access road and turning areas adjacent to existing residential properties, was also raised as an issue regarding amenity impacts of turning construction vehicles throughout the lengthy construction period. |

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| | • The extensive temporary storage areas proposed should also avoid adverse impacts on any prime agricultural land, with the phasing of these areas and their re-instatement requiring to be detailed to maintain soil quality.<br><br>• Any works required to Black Bridge that require planning permission (including any construction working / laydown areas) need to be scoped into the EIA should these works be required to enable the project to proceed. |
| Recommendations | • Once the wireframes, any flythrough material or model extracts are available, this should be shared with THC for further comment ahead of design freeze. |

**This advice is given without prejudice to the future consideration of and decision on any application received by The Highland Council**

**Thathar a' toirt seachad na comhairle seo gun chlaon-bhreith do bheachdachadh air agus co-dhùnadh a thaobh tagradh sam bith a tha Comhairle na Gàidhealtachd a' faighinn san àm ri teachd**

NatureScot
Scotland's Nature Agency
Buidheann Nàdair na h-Alba

[redacted]
Senior Consents and Environment Manager – Central & North
Scottish and Southern Electricity Networks Transmission
Inveralmond House
200 Dunkeld Road
Perth, PH1 3AQ
E: [redacted]

06 October 2023
Our ref: **CPA172460 & CPA172461**

Dear [redacted],

**Spittal - Loch Buidhe – Beauly 400 kV Reinforcement Project**

- **Spittal Hub (new 400 kV substation and HVDC Converter Station)**
- **Loch Buidhe Substation (new 400 kV substation)**
- **Beauly Hub (new 400 kV substation and HVDC Converter Station)**

I would like to thank you and your colleagues for taking the time to explain the project and your approach to identifying the substation selection sites and preferred options.

Our engagement with these projects will focus on the potential for adverse effects on sites with statutory protection for their natural heritage value. We recognise however that substation proposals are large scale developments with potential to impact on a wide range of natural heritage interests.

This letter provides our written feedback on the Detailed Site Selection Consultation documentation. A separate letter provides our feedback on the overhead powerline route options.

**Summary**

We have carefully reviewed the detail and considered the potential for the proposals to impact on nationally and internationally important sites for nature conservation. **We will consider objecting if the impacts on these raise issues of national interest that cannot be adequately mitigated.** We would do so in accordance with our guidance on Identifying Natural Heritage Issues of National

Interests in Development Proposals: https://www.nature.scot/doc/guidance-notice-no-019-identifying-natural-heritage-issues-national-interest-development-proposals (Updated May 2023 to reflect NPF4).

**NATURESCOT FEEDBACK**

We acknowledge your reasoning for selecting the preferred sites and recognition that these still present the potential to impact on internationally and nationally important nature conservation sites. We have limited our comments here to the preferred sites.

Feedback on individual protected areas is provided in Annex 1 at the end of this letter for each substation site. The following advice is generic to most locations where there is potential to impact protected areas.

**Protected areas**

The preferred sites are located within or adjacent to protected areas and have potential to cause significant effects.

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

We request that where protected areas are affected that **site specific plans** detailing all aspects of construction, operation and maintenance and the mitigation needed to avoid adverse effects are produced and submitted with relevant applications.

**We welcome ongoing liaison with you and your consultants regarding effects on protected areas and the surveys required to assess them.**

**Habitats Regulations Appraisal (HRA)**

In order to carry out an HRA the competent authority must have sufficient details about all aspects of the proposal and how it will be constructed, operated and maintained. Information should be gathered about the European sites that could potentially be impacted, including their qualifying interests and conservation objectives. Information about European sites is available on SiteLink. The definitive source for qualifying interests is:

- Qualifying Interest List for SACs
- Citation for SPAs (always use the SiteLink version and refer to the covering note where the citations await revision)

Conservation objectives can be found on SiteLink either in the Conservation Advice Package (CAP) for SACs, or as a separate conservation objectives document. CAPs also list the qualifying interests, their most recent assessed condition (and if unfavourable the reasons for this), and any recommended conservation measures.

We are happy to continue engagement with SSE on the gathering and production of information to inform the HRA. An HRA proforma is available to help guide competent authorities through the process and more information is available on our Habitats Regulations Appraisal webpages.

**Additional comments**

**Landscape**
The proposed substations at Spittal, Loch Buidhe and Beauly are not expected to result in significant effects on landscapes of national importance.

The local authority will advise on this aspect of the proposal.

**Peatlands and carbon-rich soils**
We have published new guidance (June 2023) to help NatureScot staff provide developers, planning authorities and Scottish Government with consistent advice on assessing the effects of development proposals on peatland, carbon-rich soils and priority peatland habitat: Advising on peatland, carbon-rich soils and priority peatland habitats in development management.

This is relevant guidance for developers to be aware of because it sets out the information that must be provided with the application and Environmental Impact Assessment Report (EIAR) to enable assessment of effects.

The approach set out in this guidance aligns with the National Planning Framework 4 (NPF4) policies which are relevant to development proposals on peatland, carbon-rich soils and priority peatland.

A key focus will be helping to ensure that development is designed and constructed to follow the mitigation hierarchy set out in NPF4 and that, in addition, biodiversity enhancement is delivered through peatland restoration.

The above guidance outlines the framework that NatureScot will use to consider whether the impact of development on carbon-rich soil and priority peatland habitats may raise issues of national interest, and potentially warrant an objection.

To help assess when a proposal could have a significant effect that NatureScot will consider as raising issues of national interest, we have developed an assessment framework based on

guidelines for the selection of SSSI for bogs (see **Annex 1** and the **Template** in the above guidance).

We request that this Template is completed by the applicant and submitted with the application. Where the development infrastructure (including a 250 m buffer) meets the criteria in the template, an additional map should be provided showing its locations (e.g., *Sphagnum* species) in relation to the development. If available, shape files showing the location of infrastructure, NVC communities and peat depths should also be supplied to us to aid our assessment. Full details are available in our guidance.

The routes have been selected, where possible, to avoid priority peatland habitat as mapped through NatureScot's Carbon and Peatland 2016 mapping but there are still sections that could impact on priority peatland and carbon-rich soils. Detailed studies will be required to determine its quality and sensitivity.

Protecting peatland habitats and restoring them is likely to be a significant part of this project and we would welcome early and ongoing liaison to ensure impacts on good quality habitats can be avoided and minimised through iterative design. There is also a significant wealth of expertise shared through our Peatland ACTION;
https://www.nature.scot/climate-change/nature-based-solutions/peatland-action-project

**Demonstrating positive effects for biodiversity**
NPF4 sets out new requirements for development to deliver positive effects, primarily under Policy 3. For national and major developments, or those subject to EIA, Policy 3b notes that proposals will only be supported where it can be demonstrated that they will conserve, restore and enhance biodiversity, including nature networks, so they are in a demonstrably better state than without intervention. The policy requires that significant biodiversity enhancements are provided, in addition to any proposed mitigation. Only when actions result in biodiversity being left in a better state than before development are positive effects secured.

Our Developing with Nature guidance has been prepared, in discussion with Scottish Government, to support local development applications. It sets out a number of common measures to enhance biodiversity. For national, major and EIA developments, more detailed assessment and more ambitious measures are likely to be required. The Scottish Government is developing separate guidance on Policy 3 to support delivery of biodiversity enhancement from these larger scale developments. In the meantime, aspects of our *Developing with Nature* guidance can usefully inform how to take account of biodiversity in development, including ensuring future management and monitoring maintains the biodiversity enhancements in the long term.

You should explore and identify opportunities for biodiversity enhancement as early as possible, including through discussion with key stakeholders.

Within the EIA report, information on predicted losses, proposed compensation and delivery of additional positive effects should be clearly summarised. The information must be sufficient to allow the consenting authority and relevant stakeholders to see clearly how effects will be addressed, and compensation and enhancement delivered. Developers may wish to consider the simple template at Annex C of the Developing with Nature guidance.

**Concluding remarks**

The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage. The comments provided by us are given without prejudice to a full and detailed consideration of the impacts of the proposal, should it be submitted as a formal application.

Please contact Kirsty North (Kirsty.north@nature.scot) and Jennifer Heatley (Jennifer.heatley@nature.scot) if you require any further information or advice.

Yours sincerely

[redacted]
Operations Manager – Central Highland

cc. Highland Council
Historic Environment Scotland (HES)
SEPA
Energy Consents Unit, Scottish Government

| Annex 1 – Detailed feedback on individual protected areas | |
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| **Spittal Hub - 400 kV Substation and High Voltage Direct Current (HVDC) Converter Station** | |
| **Protected area** | **NatureScot comments** |
| **Banniskirk Quarry SSSI**<br>▪ Fossil fish | The substation location is immediately adjacent to this SSSI. Connections into and out of the substation could require crossing the SSSI. Excavation on site and in the vicinity of the SSSI could provide an opportunity for research and future finds however there is also potential to compromise the interest so this would have to be assessed and mitigated sensitively through a SSSI site specific management plan. |
| **Caithness Lochs SPA and Ramsar site**<br>▪ Greenland white-fronted goose (non-breeding)<br>▪ Greylag goose (non-breeding)<br>▪ Whooper swan (non-breeding) | The site is within the connectivity distances for the 3 SPA species.<br><br>**Greenland white-fronted geese (non-breeding)** - GWFG are likely to be vulnerable to disturbance. Potential for fields used by GWFG to be close to substation site. GWFG are quite faithful to fields so sites that are on or close the substation will need to be assessed. There is some data on field use (though old) so surveys needed.<br><br>**Greylag geese (non-breeding)** – Greylag geese may feed in areas around the substation. Greylag geese are not particularly faithful to particular sites/fields so may be able to use alternative foraging. However, dispersal flight lines to/from feeding areas, could carry greater risk and this should be addressed.<br><br>**Whooper swan (non-breeding)** - Whooper swans could be vulnerable to collision with substation equipment. Depending on distances flown from the SPA, this species may be at risk. Fields may be quite 'traditionally used', especially within any winter period, less so between winters. Survey work focusing on this species will be needed. |
| **Loch Watten SAC**<br>▪ Naturally nutrient-rich lakes or lochs which are often dominated by pondweed | The SAC is c. 4 km from substation but is downhill therefore there is potential for adverse impacts from drainage. Hydrological connectivity should be investigated. It should be possible with site-specific measures to ensure that any risks to the water environment can be avoided. |
| **Caithness and Sutherland Peatlands SPA**<br>Breeding interests only:<br>▪ Black-throated diver | The substation is within connectivity distances of SPA species. Survey work will be required to determine if breeding interest species may be using or crossing the substation location in support of breeding activity. |

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| ▪ Common scoter<br>▪ Dunlin<br>▪ Golden eagle<br>▪ Golden plover<br>▪ Greenshank<br>▪ Hen harrier<br>▪ Merlin<br>▪ Red-throated diver<br>▪ Short-eared owl<br>▪ Wigeon<br>▪ Wood sandpiper | |
| **Caithness and Sutherland Peatlands Ramsar site**<br>▪ Breeding bird assemblage (red-throated diver, black-throated diver, golden plover, wood sandpiper, dunlin)<br>▪ Greylag goose (breeding)<br>▪ Dunlin (breeding)<br>▪ Blanket bog | Please refer to the comments above (for the SPA) for the bird interests.<br><br>The substation site is not with the Ramsar site and direct and indirect effects on blanket bog are not anticipated. |
| **Loch Buidhe – 400 kV Substation** | |
| **Lairg and Strath Brora Lochs SPA**<br>▪ Black-throated diver (breeding) | Divers may travel from breeding sites within the SPA to forage, but given distances from the substation, impacts on birds in flight may be unlikely. Disturbance at breeding sites is the key issue to avoid. |
| **Lairg and Strath Brora Lochs SSSI**<br>▪ Black-throated diver (breeding) | |
| **Strath Carnaig and Strath Fleet Moors SPA**<br>▪ Breeding hen harrier | There is a high potential for construction to disturb breeding birds. Survey data will be crucial in understanding what the likely impacts are. Where disturbance is a risk timing of construction may be able to mitigate the impact. |
| **Strath Carnaig and Strath Fleet Moors SSSI**<br>▪ Breeding hen harrier | |
| **Beauly Hub – 400 kV Substation and HVDC Converter Station** | |
| **Cromarty Firth SPA** | |

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| Breeding birds:<br>▪ Common tern<br>▪ Osprey<br>Non-breeding birds:<br>▪ Bar-tailed godwit<br>▪ Curlew<br>▪ Dunlin<br>▪ Greylag goose<br>▪ Knot<br>▪ Oystercatcher<br>▪ Pintail<br>▪ Red-breasted merganser<br>▪ Redshank<br>▪ Scaup<br>▪ Whooper swan<br>▪ Wigeon<br>▪ Waterfowl assemblage | Osprey associated with the Cromarty Firth SPA, and Inner Moray Firth SPA, are known to nest in the wider area including at Aigas Gorge, which lies in close proximity to the proposed substation and converter station at Kinellan. There is a high potential for disturbance to osprey during construction, especially if works are to take place within the osprey breeding season (February to September). Survey data will be crucial to determine likely effects to osprey breeding in the wider area and inform species mitigation plans that may mean working outwith the breeding season if it is not possible to avoid disturbance.<br><br>No direct or indirect impacts to non-breeding birds, or SSSI/RAMSAR habitats, is anticipated. |
| **Cromarty Firth Ramsar site**<br>Non-breeding birds:<br>▪ Bar-tailed godwit<br>▪ Greylag goose<br>▪ Waterfowl assemblage<br>▪ Intertidal mudflats and sandflats | |
| **Cromarty Firth SSSI**<br>Non-breeding birds:<br>▪ Bar-tailed godwit<br>▪ Red-breasted merganser<br>▪ Redshank<br>▪ Whooper swan<br>▪ Wigeon<br>▪ Mudflats | |

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| ▪ Saltmarsh<br>▪ Sandflats | |
| **Glen Affric to Strathconon SPA**<br>▪ Breeding golden eagle | The proposed substation and converter station lies approximately 10km from the SPA. There are unlikely to be any direct or indirect impacts to breeding golden eagle as a result of this proposal. |
| **Inner Moray Firth SPA**<br>Breeding birds:<br>▪ Common tern<br>▪ Osprey<br>Non-breeding birds:<br>▪ Bar-tailed godwit<br>▪ Cormorant<br>▪ Curlew<br>▪ Goldeneye<br>▪ Goosander<br>▪ Greylag goose<br>▪ Red-breasted merganser<br>▪ Redshank<br>▪ Scaup<br>▪ Teal<br>▪ Wigeon<br>▪ Waterfowl assemblage | Osprey associated with the Inner Moray Firth SPA, and Cromarty Firth SPA, are known to nest in the wider area including at Aigas Gorge, which lies in close proximity to the proposed substation and converter station at Fanellan. There is a high potential for disturbance to osprey during construction, especially if works are to take place within the osprey breeding season (February to September). Survey data will be crucial to determine likely effects to osprey breeding in the wider area and inform species mitigation plans that may mean working outwith the breeding season if it is not possible to avoid disturbance.<br><br>No direct or indirect impacts to non-breeding birds, or SSSI/RAMSAR habitats, is anticipated. |
| **Inner Moray Firth Ramsar site**<br>Non-breeding birds:<br>▪ Bar-tailed godwit<br>▪ Greylag goose<br>▪ Red-breasted merganser<br>▪ Redshank<br>▪ Waterfowl assemblage<br>Habitats:<br>▪ Intertidal mudflats and sandflats | |

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| ▪ Saltmarsh<br>▪ Sand dunes<br>▪ Shingle | |
| **Beauly Firth SSSI**<br>Non-breeding birds:<br>▪ Goosander<br>▪ Greylag goose<br>▪ Red-breasted merganser<br><br>▪ Vascular plant assemblage<br>▪ saltmarsh | No direct or indirect impacts to non-breeding birds, or SSSI habitats, is anticipated. |

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

**By email to:** [redacted]

[redacted]
Senior Consents and Environment Manager - Central & North
SSEN Transmission

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

HMConsultations@hes.scot
Enquiry Line: 0131-668-8716

Our case ID: 300064505

06 October 2023

Dear [redacted]

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Beauly, Highland – New 400kV substation
Substation Site Selection Consultation

Thank you for your email of 31 August 2023, which invited our pre-application comments on the above project. This letter contains our comments for our historic environment interests. Our remit is World Heritage Sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories. Please also seek information and advice from The Highland Council's archaeology and conservation services for matters including unscheduled archaeology and category B and C-listed buildings

I understand that you are inviting interested parties to comment on the proposals by Scottish and Southern Electricity Networks (SSEN) on the site selection options for a new 400kV substation and a 525kV HVDC converter station at Beauly, Highland. We understand that these new stations form part of the overall project to construct a new 400kV overhead line (OHL) between Spittal in Caithness, via Loch Buidhe to Beauly, Highland and to facilitate the link to the Western Isles. This is required as part of the wider programme of increasing electricity grid capacity to meet Scottish Government's Net Zero targets and to meet the increasing capacity demands from the number of onshore and offshore renewable energy developments being constructed.

We have provided our detailed comments on the site options in the attached annex.

We hope that you find this response helpful, please do not hesitate to contact us if you wish to discuss any aspect in further detail at any point. The officer managing this case is [redacted] who can be contacted by phone on [redacted] by email on [redacted]

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

[redacted]

Yours sincerely

[redacted]

**Historic Environment Scotland**

[redacted]

[redacted]

**Annex** [redacted]

W[redacted]nd that the proposals for the new substation and converter station has considered options which include separate but relatively close sites for the substation and the converter station but also options which would combine the two stations into one larger but relatively more contained solution to reduce the spread of infrastructure required.

We note that from 16 potential sites originally considered the options have now been reduced to 4 sites with an additional quarry site recently also considered.

There are a number of designated historic environment assets within our remit in the vicinit[redacted]tation Site Options.

- Kiltarlity Parish Church (SM5570)
- Corff House, fort SW of (SM3195)
- Culburnie, ring cairn and stone circle (SM2425)
- Belladrum, Chambered Cairns 250m NNE Of Brockie's Lodge (SM2435)
- Dun Mor, fort, Ballindoun (SM2423)
- Phoineas Hill, enclosure 900m ESE of Phoineas House (SM4729)
- Dun Garbhaig, fort, Kilmorack (SM2422)
- Beaufort Castle (GDL00052)
- Beaufort Castle (LB8068)

**Preferred option – Site 7**
At this stage it appears likely that a new substation could potentially be located at this site without raising issues of national interest for our remit. However, this should be confirmed by full assessment once the details of the proposed substation including potential mitigation options, through landscaping, for example are known. We would also note that the cumulative impacts of the proposed option along with the required overhead line infrastructure should be considered when more detailed assessment is undertaken.

Scheduled monuments
This option is the least likely to have significant impacts on the settings of nearby scheduled monuments. Site 7 as a combined option would see the proposed substation situated on the plateau at Fanellan, a site which is surrounded by native woodland of Ruttle Wood to the northwest and the Fanellan Wood to the east. This woodland and the flat nature of the plateau at Site 7 is likely to screen the majority of the proposed substation in views from Dun Garbhaig, fort, Kilmorack (SM2422) and Kiltarlity Parish Church (SM5570). Woodland may also provide screening cover in views from Dun Mor, fort, Ballindoun [redacted] Phoineas Hill, enclosure 900m ESE of Phoineas House [redacted] and Culburnie, ring cairn and stone circle (SM2425). It is unlikely that the

proposed dev[redacted]7 location would be visible from Corff House, fort SW of (SM3195) due to the intervening quarry and forestry south of Beauly. [redacted]

The supplied Options Appraisal also notes that there is a possibility to partially reduce the height of buildings in the proposed substation by sinking them into the plateau of Site 7 at Fanellan, which may further reduce any impacts on the settings of these adjacent scheduled monuments. Further mitigation, particularly of connecting OHLs in this area, should also be considered including the possibility of buried cables and connections in sensitive areas to reduce setting impact upon assets within our remit.

Further assessment of these impacts should, however, be undertaken if this option is to be taken forward, ideally through ZTV and targeted visualisations. We would be happy to advis[redacted]visualisation points. This will allow for a more detailed assessment of the scale of impacts to be provided.

Inventory Gardens & Designed Landscapes and category A listed buildings

Site 7 is located west of the Beaufort Castle Inventory Garden and Designed Landscape (GDL00052) some 1.9km to the west of Beaufort Castle (LB8068). The substation may be visible from the Castle and parkland which forms the core of the designed landscape around the Castle, however, much of the perimeter of the estate is enclosed by mature estate woodland, which may limit any visibility. Although there is potential for impacts on both the setting of the Castle and its designed landscape, we think they are unlikely to raise issues of national interest.

It may be possible to reduce any significant impacts by design, for example, reducing heights of towers if possible, micro-siting tower locations or undergrounding cables.

**Other site options**

Main options

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

Sites 9, 11 and 11a sit in open plains to the south, southeast and east of Beauly and would be clearly visible, albeit at a low level, from nearby scheduled monuments around Beauly, in particular Corff House, fort SW of (SM3195), Dun Mor, fort, Ballindoun (SM2423) and Phoineas Hill, enclosure 900m ESE of Phoineas House (SM4729). The [redacted]ment in these locations would disloc[redacted] monuments [redacted]and around the river Beauly. While we have not considered these options in depth, given the level of information currently available, it is likely that all

of these subs[redacted]particular any connecting OHLs would have significant adverse impacts on the setting of these scheduled monuments.

Quarry Options

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

Quarry A would be situated as an extension of the existing Balblair Wood quarry to the immediate north of the River Beauly. While the principle of quarrying is established in this lo[redacted]xtension of the Balblair Wood quarry site which might be required would bring development closer to the scheduled area across the river at Kiltarlity Parish Church (SM5570), potentially within 300m of the scheduled area.

Views from Kiltarlity Parish Church (SM5570) to the north are currently screened from the existing quarry by a shelterbelt of trees on the immediate north bank of the River Beauly, and the proposals for the establishment of the Quarry A site would retain a small shelterbelt. Should this option be taken forward we support the retention of this shelterbelt which provides an important function in screening and focussing the sight line north from the scheduled area to local views of the river and its banks. Should the current tree screening be removed to open up this view to the quarry and HVDC site it would have a significant impact upon the setting of the scheduled monument, such that it would likely raise issues of national interest and we would have to object, as operations within 300m of the scheduled area would serve as both a distraction to setting of the monument, its character and sense of place, and its relationship with the river which all form key aspects of its setting.

Provided this screening can be delivered/ensured we would be content that Quarry A would not result in significant impacts on the monument's setting. We would welcome further consultation on this aspect of the proposals as they develop due to the sensitivities around this monument should this option be taken forward.

We would also note that currently the assessment for the site at Quarry A appears to have only considered the category B listed building at Kiltarlity (LB8081) and does not appear to have considered the scheduled monument identified above.

**Cumulative impacts**

In addition to the potential impacts from the combined substation and converter station or [redacted]ion sites, it will be vital to consider th[redacted]ative impacts from [redacted]s due to connect into the sites.

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

Our response [redacted] or the new 400kV overhead line between Spittal and Beauly is provided separately but we would note here that all of the proposed route o[redacted] of the Beauly substation options potentially raise concerns over significant adverse impacts to the setting of designated assets.

This includes assets to the north on the Beauly to Loch Buidhe section of the OHL route which passes in close proximity to a cluster of likely Iron Age forts including Dun Fhamhair (SM5212), Dun a Chliabhain (SM2424), Dun a Garbhlaich (SM2422) and Dun Mor (SM4979) to the northwest of Beauly, and with the proposed Beauly-Blackhillock-New Deer-Peterhead OHL route which passes in close proximity to another cluster of likely Iron Age forts including Dun Mor, fort, Ballindoun (SM2423), Phoineas Hill, enclosure 900m ESE of Phoineas House (SM4729) and Castle Spynie, broch (SM4653) to the [redacted]f Beauly. The Beauly-Blackhillock-New Deer-Peterhead also has the potential to impact on the setting of the Beaufort Castle GDL and associated listed buildings.

**Summary**
At this stage and based on the information provided so far, we consider it likely that a substation could be accommodated at the preferred option combined Site 7 without raising issues of national interest for our remit. It will also be important to assess the cumulative impacts of the associated overhead lines, underground cable routes and other proposed substations in the vicinity which require to connect into the substation.

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

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

**Historic Environment Scotland**
06 October 2023

[redacted]

[redacted]

The Highland Council
Comhairle na Gàidhealtachd

**PRE-APPLICATION ADVICE FOR MAJOR DEVELOPMENTS**

| | | | |
|---|---|---|---|
| **Reference no:** | 23/04003/PREMAJ | **Date of Issue:** | 14 November 2023 |
| **Proposal:** | New Beauly area 400kV substation and HVDC converter station and associated Overhead Lines | **Address:** | Land 350M NE Of Farmhouse<br>Groam<br>Beauly |
| **Case officer:** | [redacted] | **Email and phone no:** | [redacted] |
| **Confidentiality Requested** | Yes | | |

**This pre-application advice has been specifically prepared for SSE as the applicant and as the agent for the proposed development at Land 350M NE Of Farmhouse Groam Beauly**



## Description of Proposal

The focus of this pre-application advice is the proposed Beauly area 400 kV substation, 525 kV HVDC converter station, and associated overhead lines that are proposed in the immediate vicinity of those facilities.

A number of route options for the overhead line have been identified by SSEN, including their initially preferred route. Detailed advice on the entirety of the proposed overhead lines from Beauly to The Highland Council's boundary with Moray Council, from where the proposed overhead line will proceed via Blackhillock and New Deer to Peterhead, is therefore not provided. This aspect of the proposal is intended to be the subject of a separate pre-application meeting, anticipated to take place at the alignment stage in Q1 2024.

A number of site options for the substation and converter station have been identified by SSEN. These have been narrowed down by SSEN to five sites, set out as four options. Three of those options each involve a combination of two sites, one to accommodate the substation and the other to accommodate the HVDC converter station. The fourth option would combine both facilities on a single site (site Option 7) and that is understood to be SSEN's initial preference. The converter station and the substation would be linked by underground cable. The proposed new substation would also be linked to the existing Beauly substation, by 400 kV overhead line, with some additional works required within the existing Beauly 400 kV substation.

These collective elements are understood to comprise a key part of the required grid reinforcements, (new 400 kV onshore and offshore links between Spittal, Beauly and Peterhead), to enable in particular the connection of sufficient Scotwind offshore wind generation projects by 2030 to help meet ambitions set out in the British Energy Security Strategy (April 2022) and subsequently in National Grid's, the Electricity System Operator's (ESO), "Pathway to 2030" Holistic Network Design (HND) (July 2022), which are set within the context of Scottish and UK Governments' Net Zero climate change targets.

A new HVDC connection will also be required to transmit electricity generated from the Western Isles and surrounding offshore areas to centres of demand on the UK mainland. The developer has identified the

most suitable place on the 400 kV transmission network to connect as being at Beauly. The size of the subsea link required has increased from its original 600 megawatt (MW) to 1.8 gigawatt (GW) in order to allow Scotwind projects located around the west coast to connect. The HVDC underground cable would be routed from the landfall at Dundonnell to the converter station proposed at Beauly.

**Summary of Key Issues**

The Council is supportive of renewable energy developments in principle, including the necessary grid connections. The need for the development is well established, with this national development looking to deliver a vital part of NPF4's National Spatial Strategy. This is however a substantial complex project that will take considerable time to consider, and will require extensive ongoing collaboration, in order to be consented and delivered on a phased basis.

The land take requirements of the proposed development will be substantially larger than the existing collective substations at Beauly. The proposals are of a different character, with the size and scale of the connecting lines being larger than any others located within this part of Highland. In recognition of this, the detailed response that follows deals mainly with the high-level issues associated with the substation location options presented. SEPA, NatureScot and Historic Environment Scotland (HES) have all provided detailed comments. Please note, that while these consultees are broadly supportive of SSEN's site preferences, further detailed information will be required moving forward to confirm the optimal overall project design.

Beyond the feedback from these consultees, the Council's key concerns at present relate to minimising the effects on surrounding landscape, visual amenity and on the affected communities. In this respect, Officers request that all undergrounding options are fully considered for the initial stretches of the connecting transmission lines which cross through, or in the vicinity of, the more densely populated areas both to the north and east of the proposed new substation and converter station. Should this not be possible for the 400 kV lines, scope to rationalise or underground other transmission lines in the vicinity must be explored to help mitigate the likely widespread cumulative impacts of this proposal.

Although the current strategy to locate the substation and converter station at one single site is understood as SSEN's preference, the Council is concerned with the potential landscape and visual impacts associated with this approach, particularly given the elevated preferred site (Option 7). Officers are also keen that transmission infrastructure in this area remains contained wherever possible. In this regard, whilst the ongoing noise impacts associated with Beauly substation are rightly a concern and a development constraint, siting the larger buildings (the HVDC converter station) low down within the worked-out quarry floor further west of Balblair has advantages, providing that the associated environmental impacts of this can be successfully mitigated, and surrounding perimeter woodland and habitat can be retained, which would also help to limit Beaufort Castle setting impacts. At this stage it remains unclear if this would be technically deliverable, and the Council therefore encourage SSEN to commit to considering this option in full until there is clear robust technical and/or environmental justification for resorting to siting the HVDC buildings elsewhere.

Should this ultimately result in preferred site Option 7 being developed for both the substation and converter station, SSEN are encouraged to reduce the extent of land take required, with developing a sloping site resulting in significant ground engineering works to form a developable platform, with extensive areas also being required for adequate SUDS provision, access and landscaping. Further consideration should therefore be given to the use of Gas Insulated Switchgear (GIS), as well as lowering the site through cut and fill, as well as having a landscape architect involved in designing the formation levels to work with the existing contours. For the larger buildings on site, these should be reduced in height wherever possible, and care should also be taken to design buildings which are fit to be seen in the landscape, particularly if their profile will be sky-lining in any key views or from transportation routes.

It would be useful to have Zone of Theoretical Visibility mapping, wireframes, visualisations / photomontages available for the proposed development and enter into further discussions through the Council's design workshop service, so as more targeted feedback on landscape and visual impact matters can be provided by our Landscape Officer. Thereafter, it will be important that any proposal coming forward are presented as comprehensively as possible, considering not only the footprint of the required buildings and connection lines, but also the full detail of woodland planting / landscaping, biodiversity enhancement, wayleave corridors, access, maintenance, construction laydown areas, and local sources of aggregate.

Another key consideration is how construction impacts will be managed, including what mitigation will be required for the local road network, notably access over the River Beauly via the Black Bridge, with it envisaged that construction will be undertaken over several years in an area which has already been subject to extensive construction work associated with the development and expansion of Beauly substation. A wide range of other supporting technical studies will be required as set out within this response pack with it being envisaged that the application be subject of Environmental Impact Assessment which covers the scope of works required for the Beauly substation and converter station, the associated overhead and underground lines, and all other associated infrastructure which form an integral part of 'the project'.

As noted above, the Council is generally supportive of transmission projects and understand the extensive strategic benefits of the project in this respect. That said, concern remains with: the size of this project; the lack of potential suitable sites which are well screened or at a lower elevation to accommodate the height and scale of buildings proposed; the extent of overhead line cabling proposed; the limited separation from residential receptors; and the resultant impacts on the receiving environment. It is also envisaged that community wealth building would be integral aspect to this proposal and the challenge remains for SSEN to demonstrate how socio-economic benefit would be maximised to achieve a just transition for the affected communities.

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

| **Background Information** | | |
|---|---|---|
| Site Area | Unknown | |
| Land Ownership | Multiple ownership | |
| Existing Land Uses | Predominantly arable land including restoration grassland and forest and woodland. Sections of Site 7 include heathland and moorland or rough hill pasture. | |
| Grid Reference | 251507 (E) | 844284 (N) |

**Consents Required**

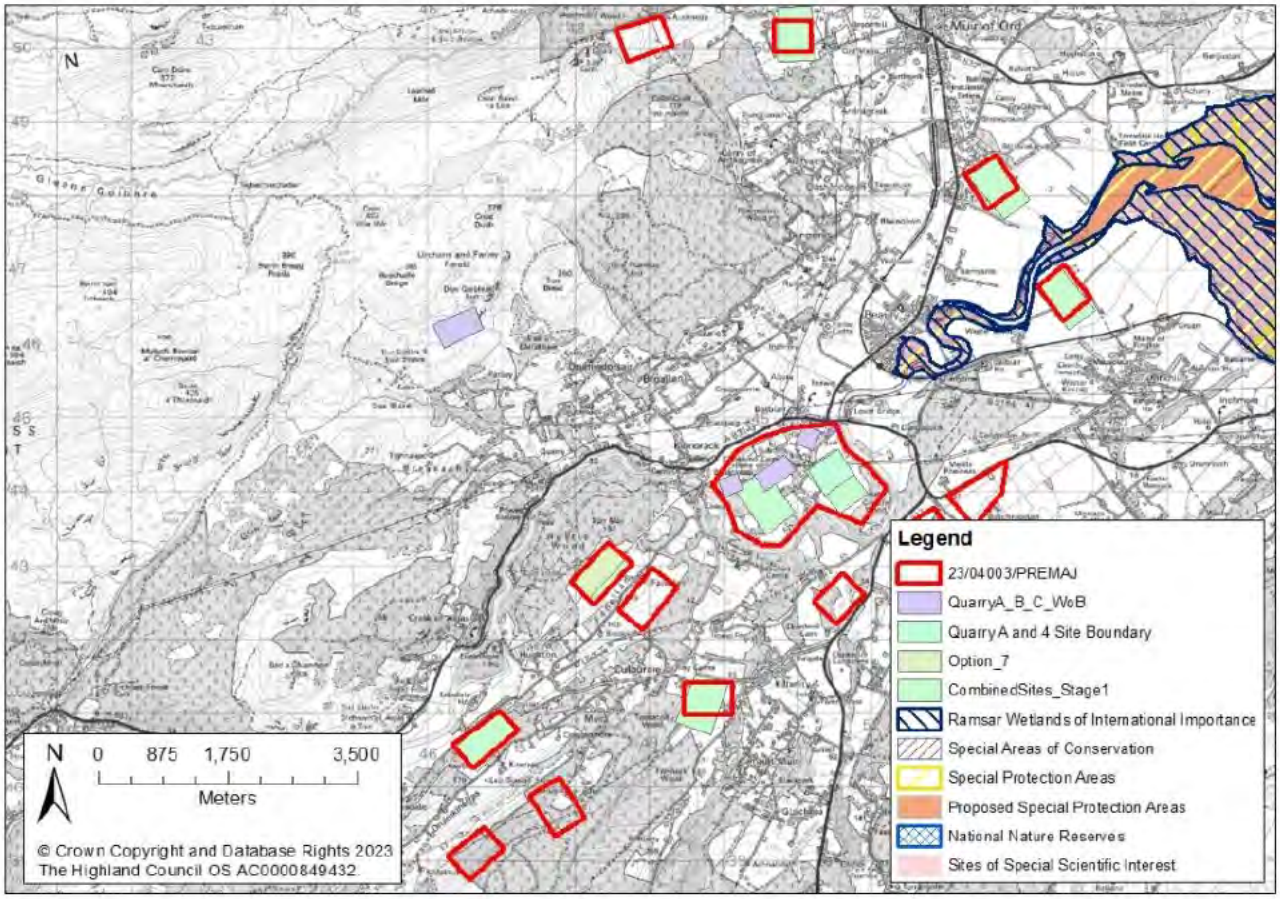
You are advised that the following consent(s) will be required for the proposed development:

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

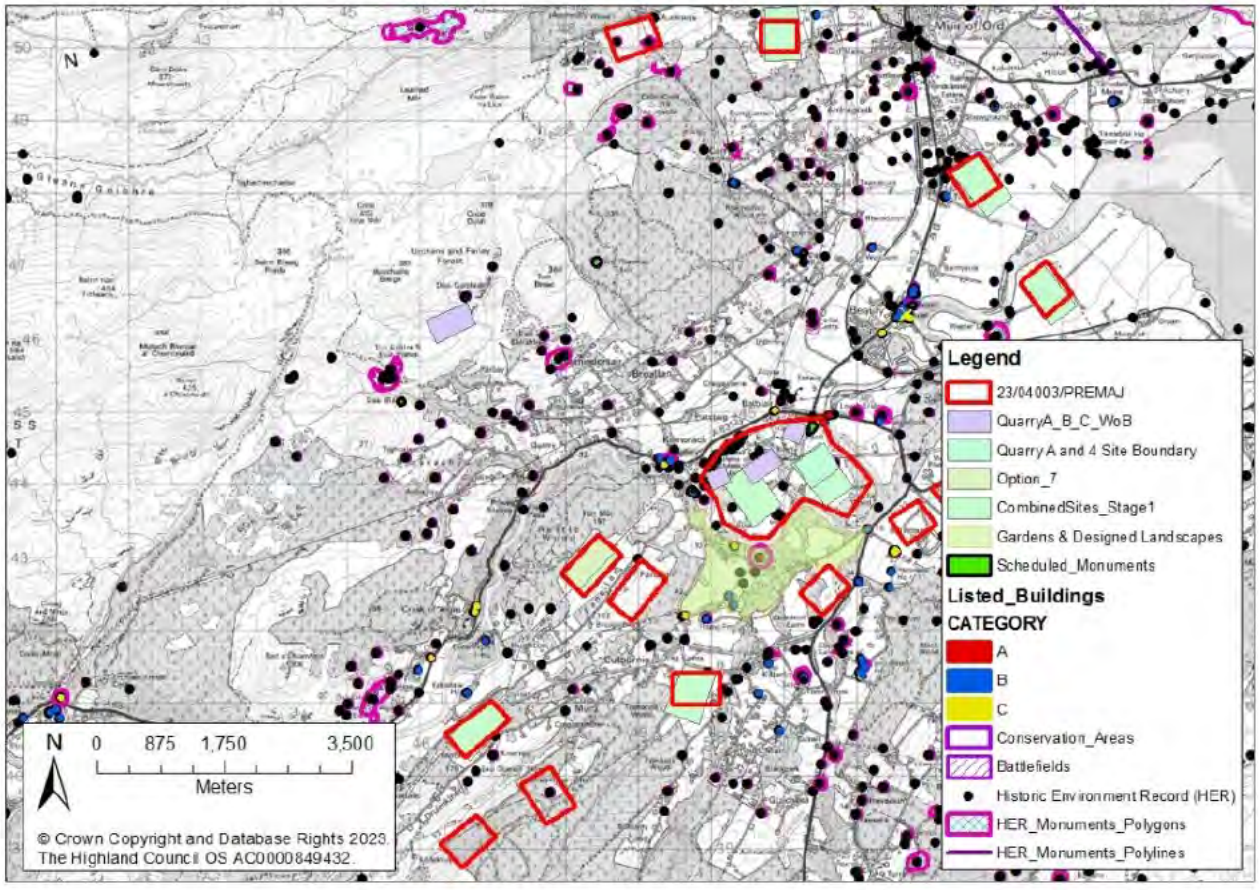
A number of constraints maps are included as part of the advice given in the advice pack but will be limited in scope, number, scale and detail in light of the nature of the broad nature of the pre-application proposals. Further maps can be provided upon further request.

## Site Constraints Mapping – Substation and Converter Station (Overview)

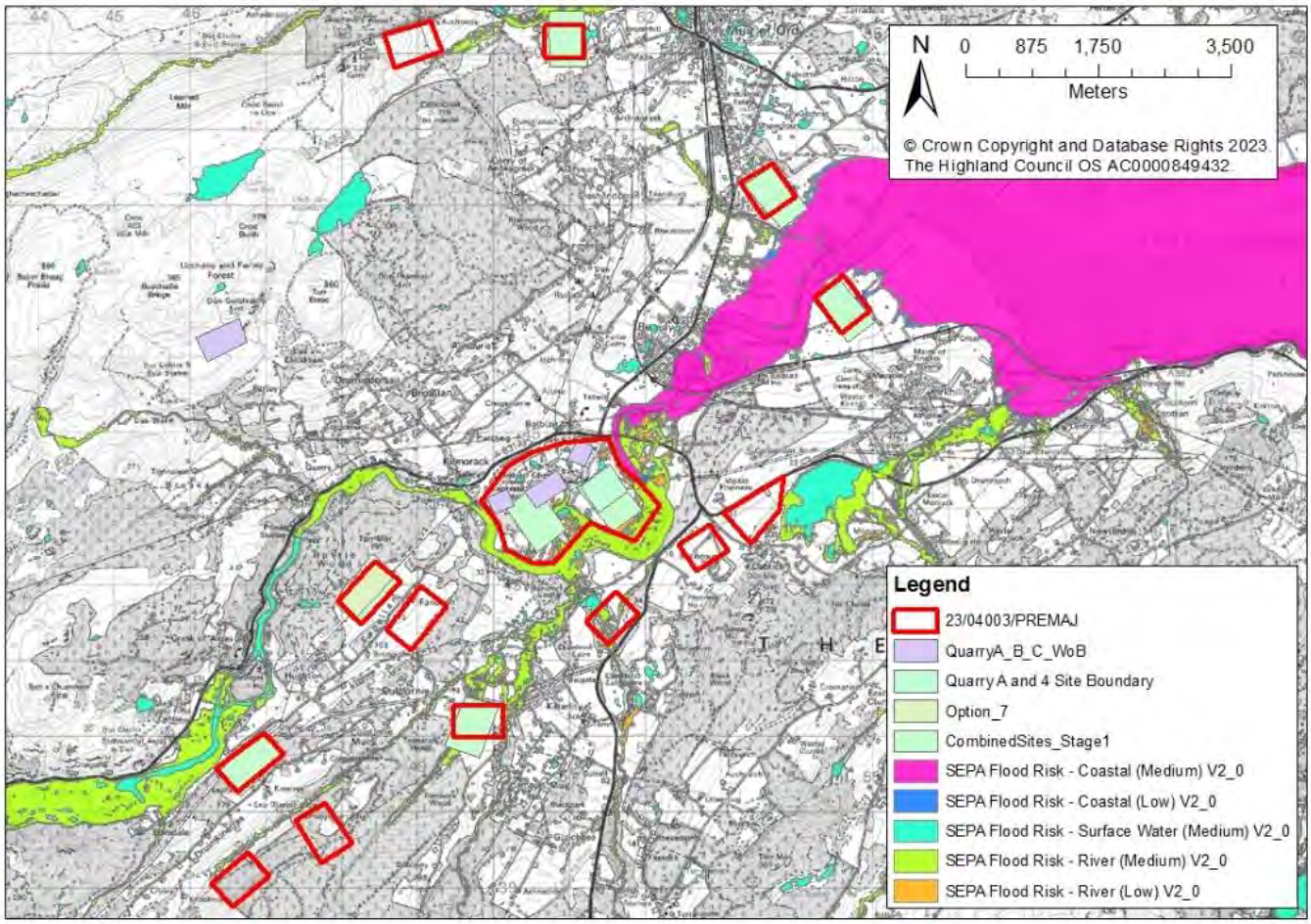
### Natural Heritage Designations



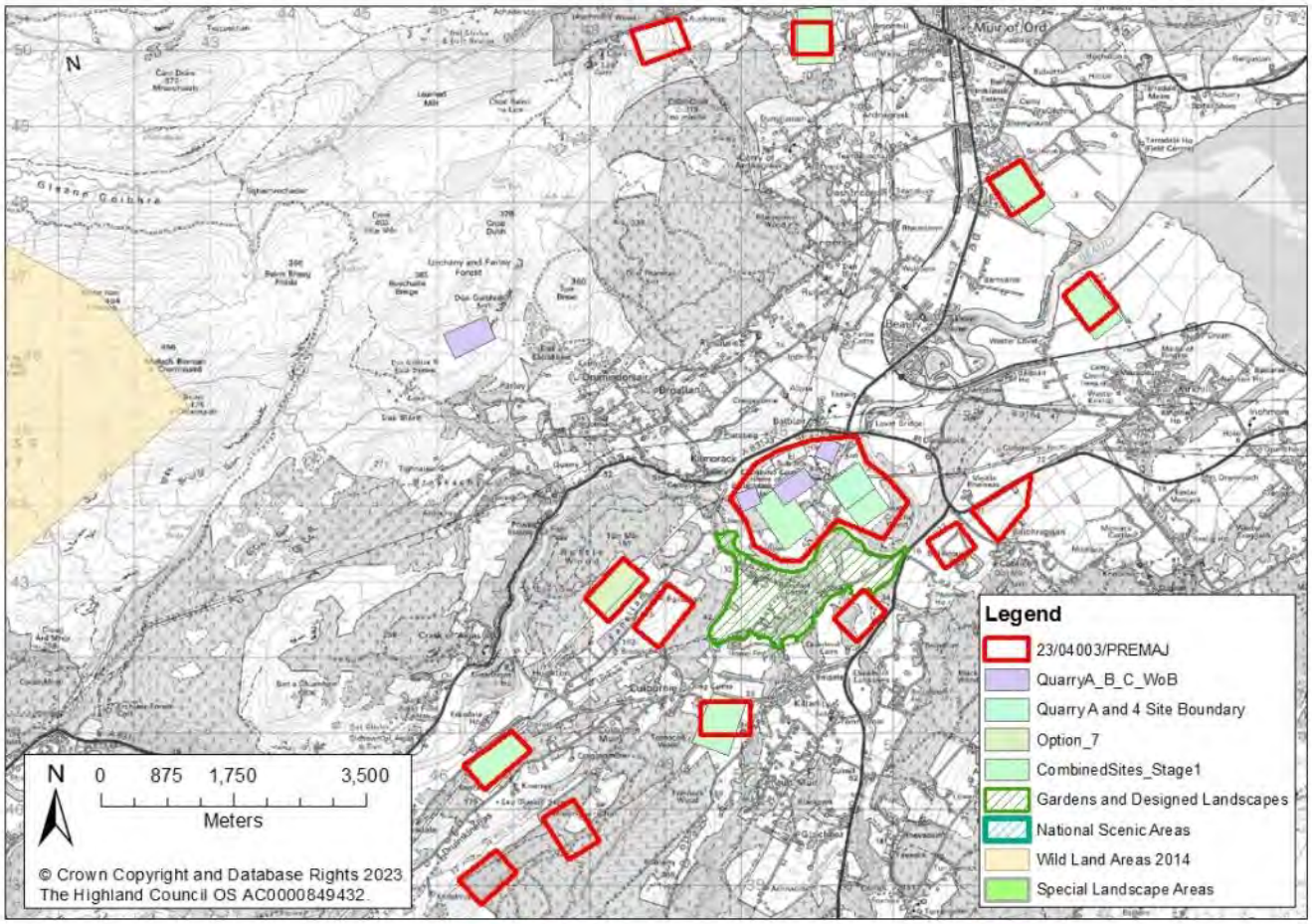

### Built Heritage



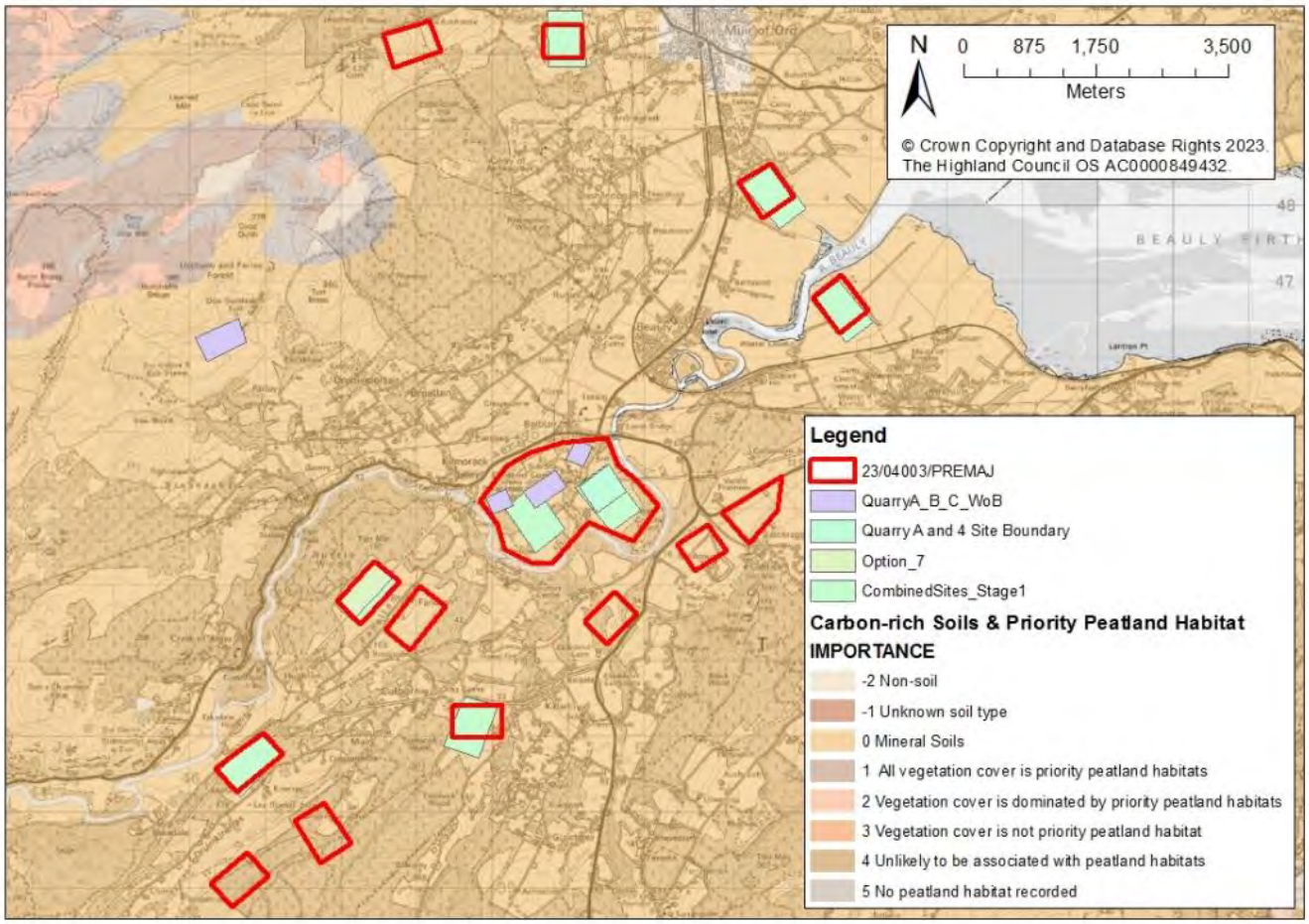
## Flood Risk



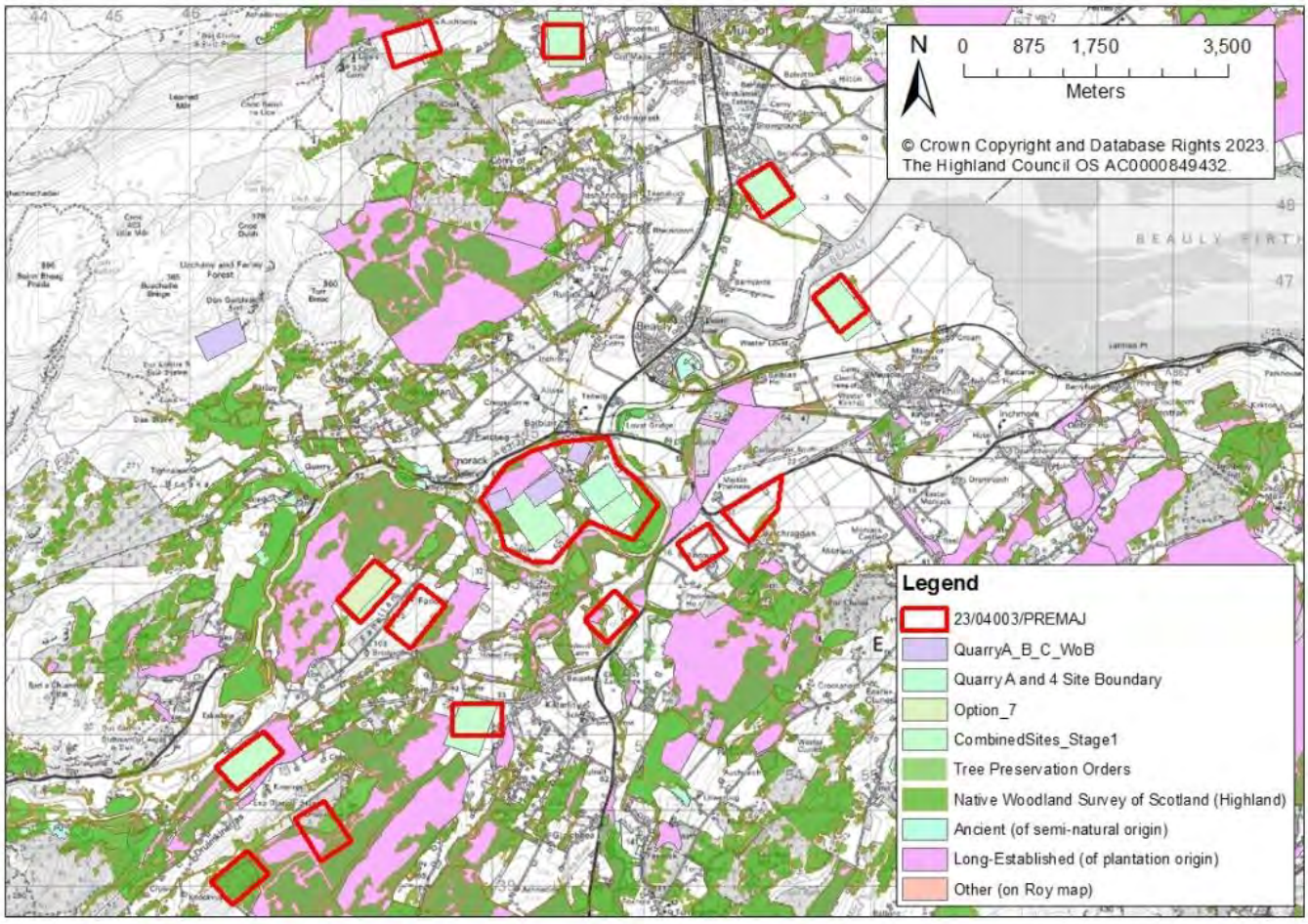

## Landscape



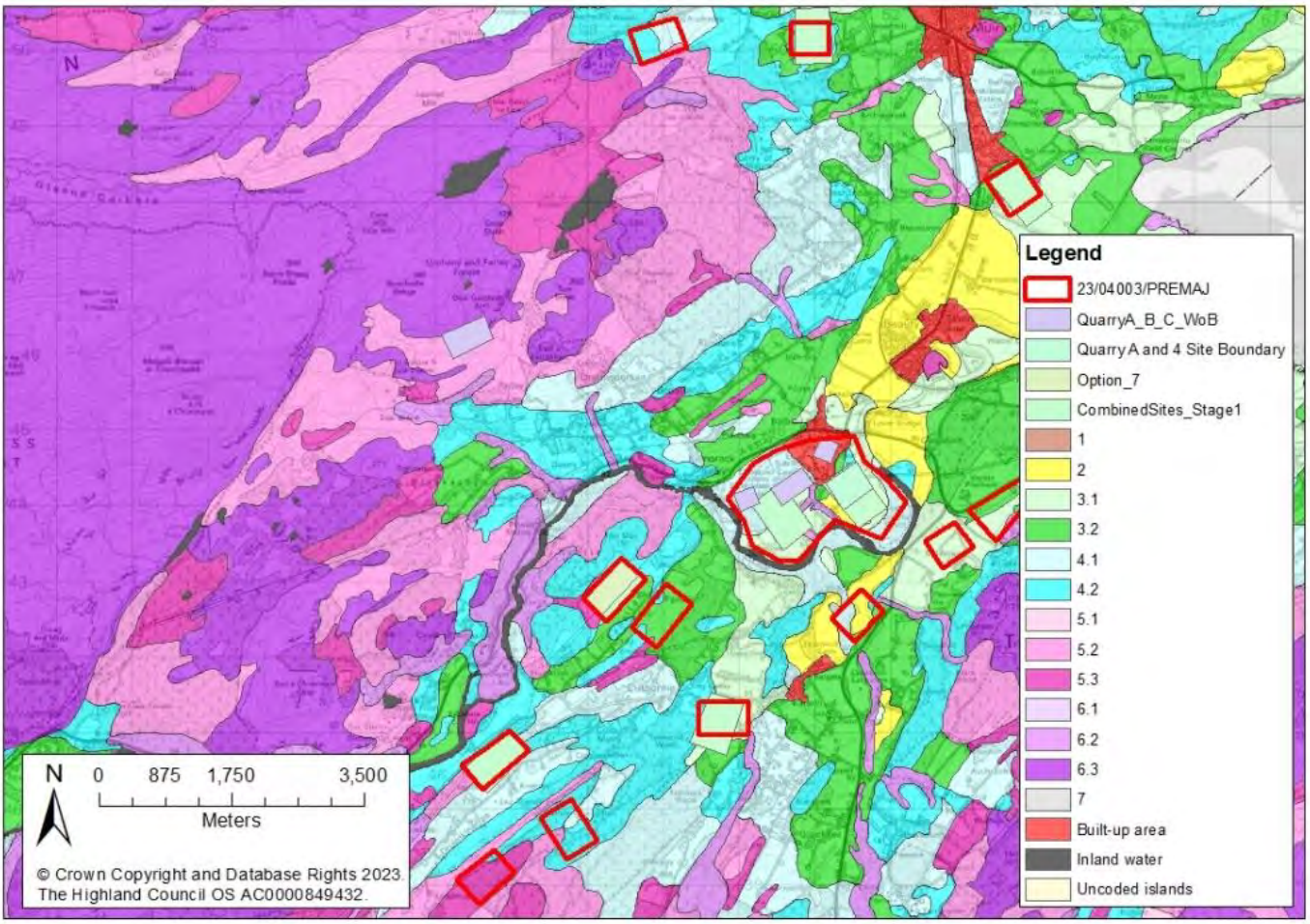
## Carbon Rich Soils



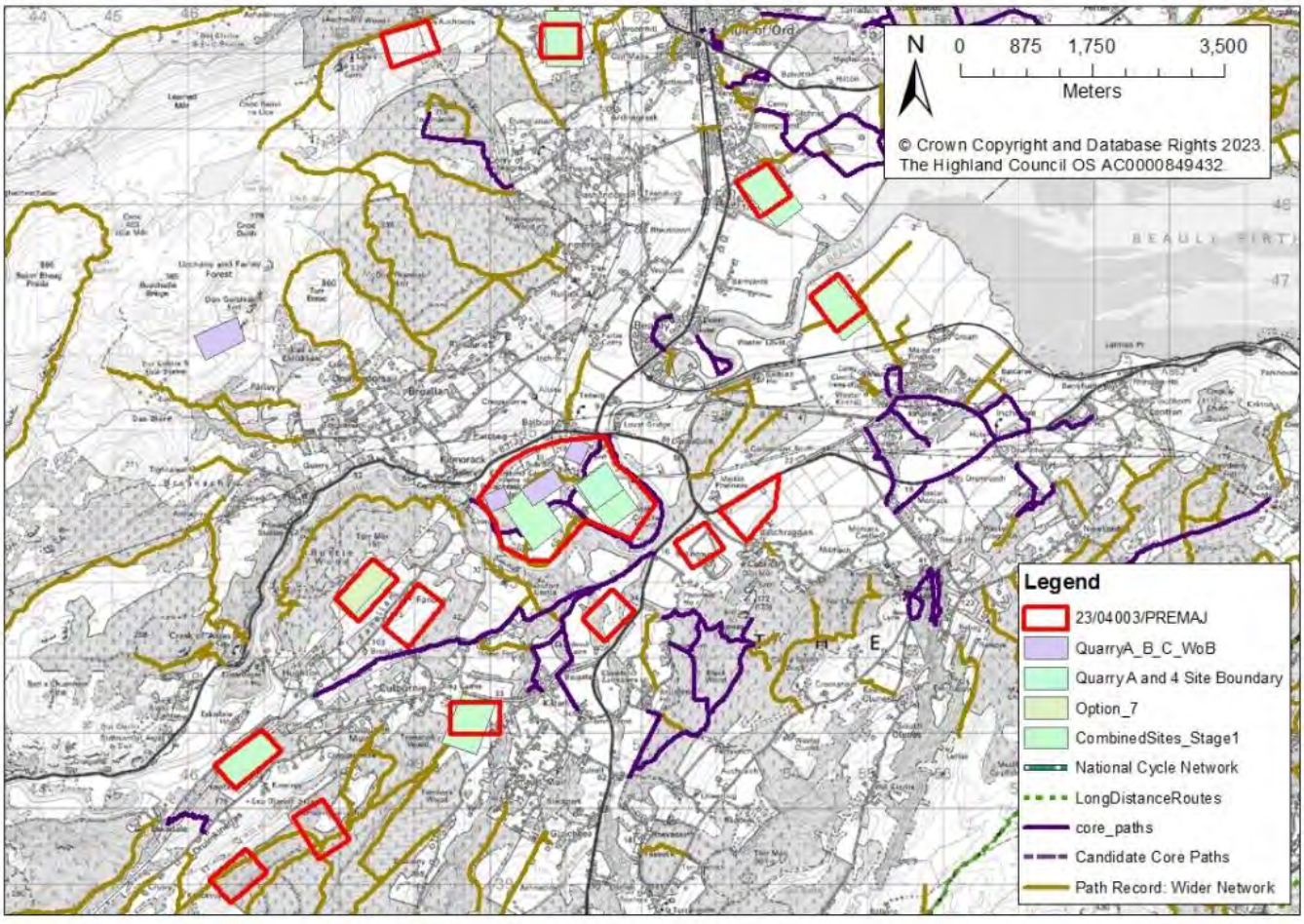

## Forestry



## Prime Agricultural Land

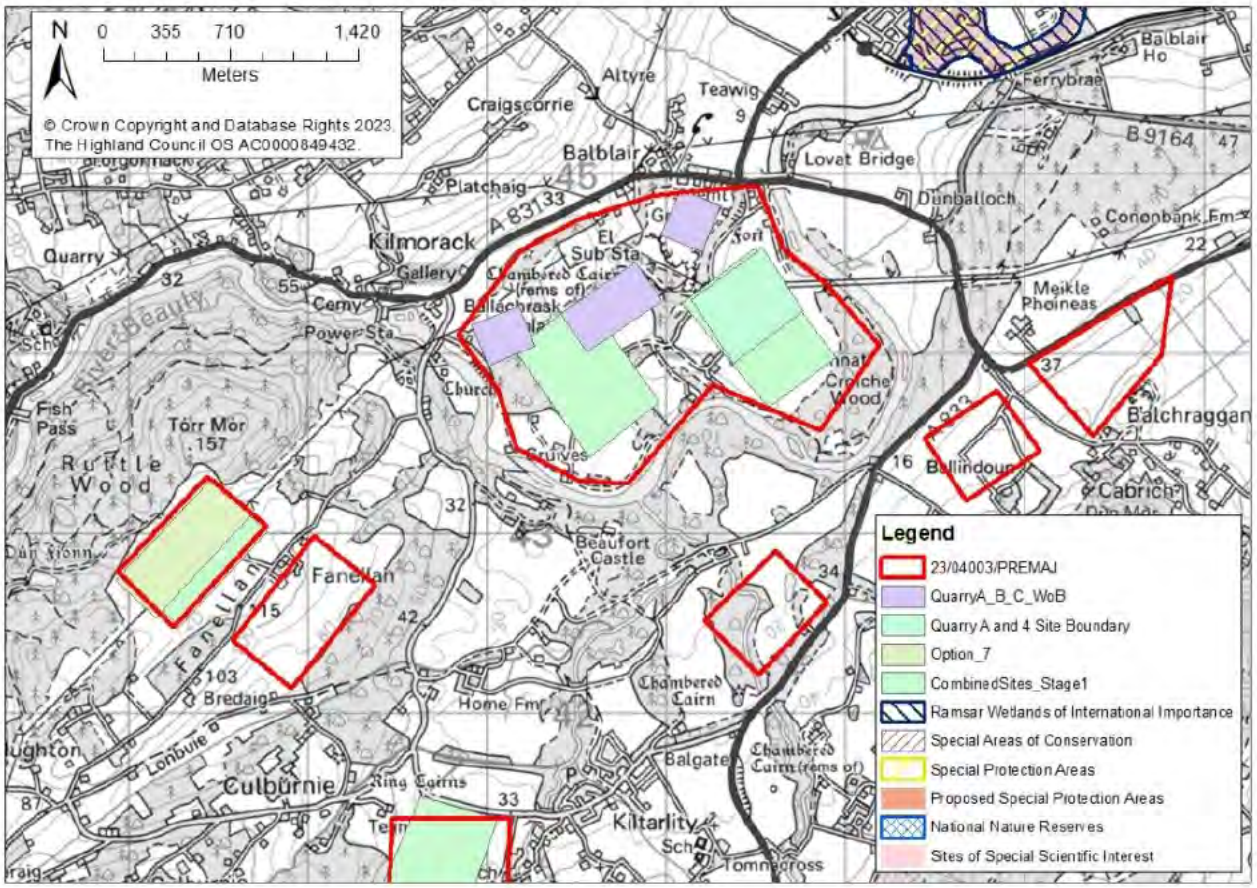



## Outdoor Access

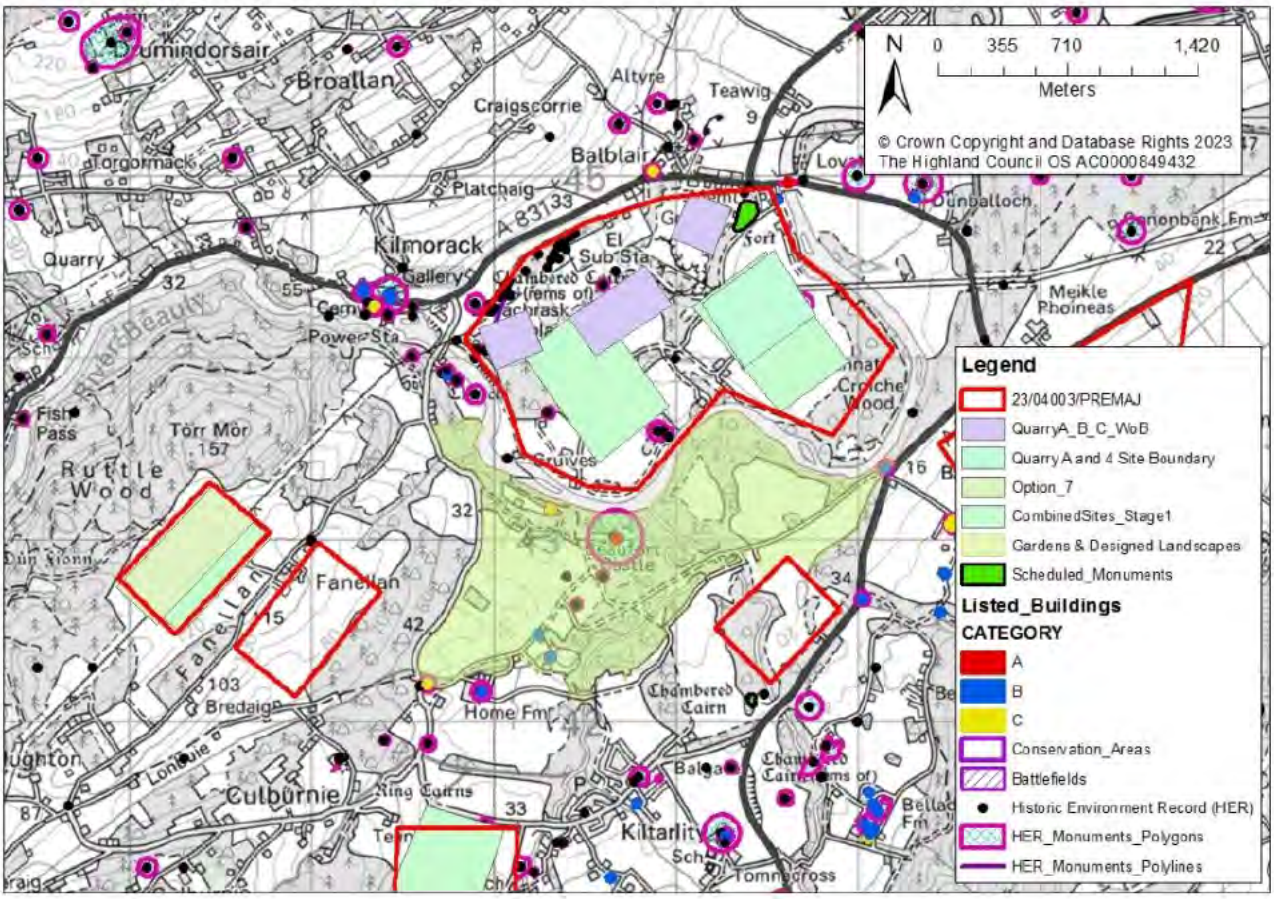


## Site Constraints Mapping – Substation and Converter Station (Quarry Cluster)

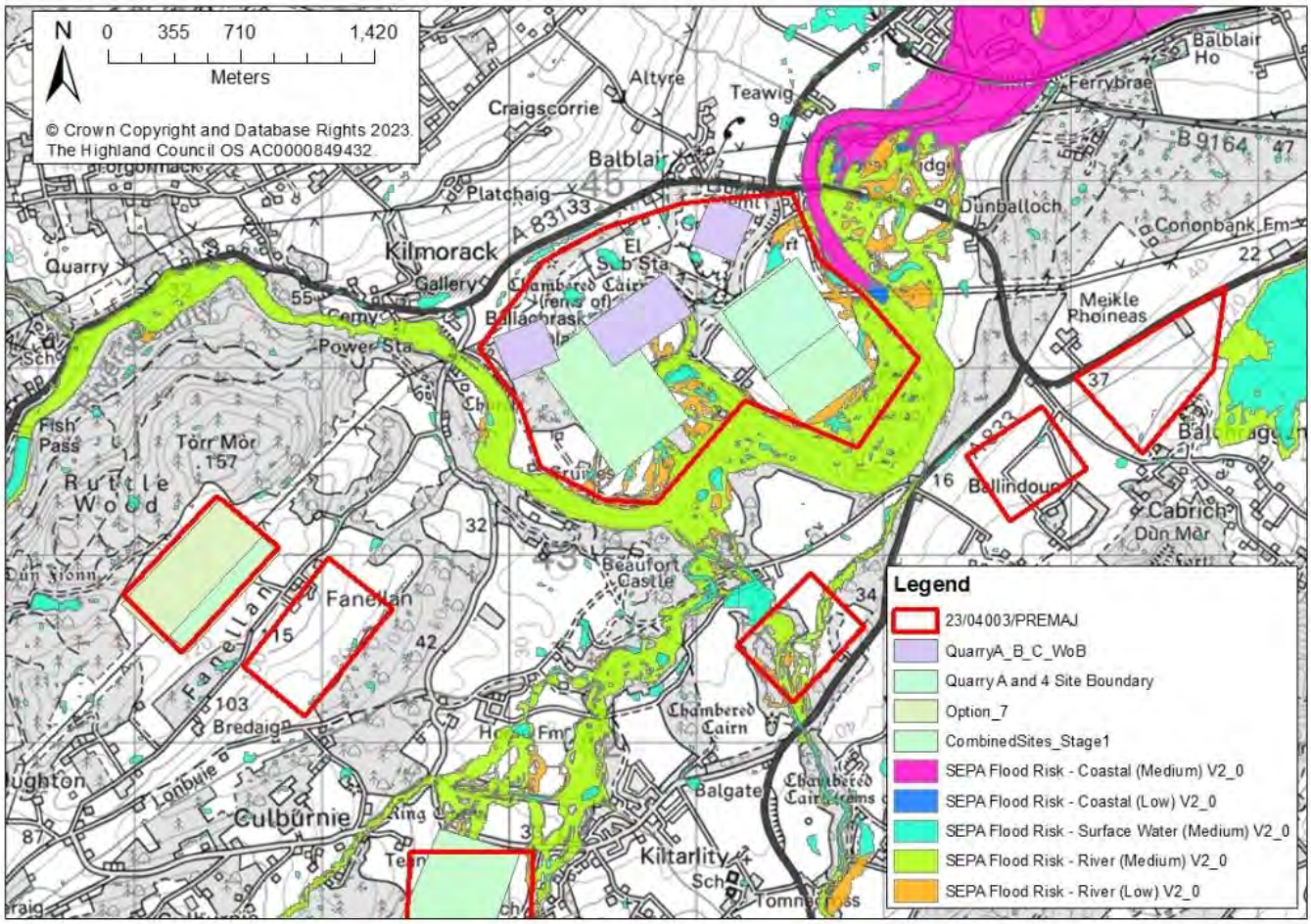
### Natural Heritage



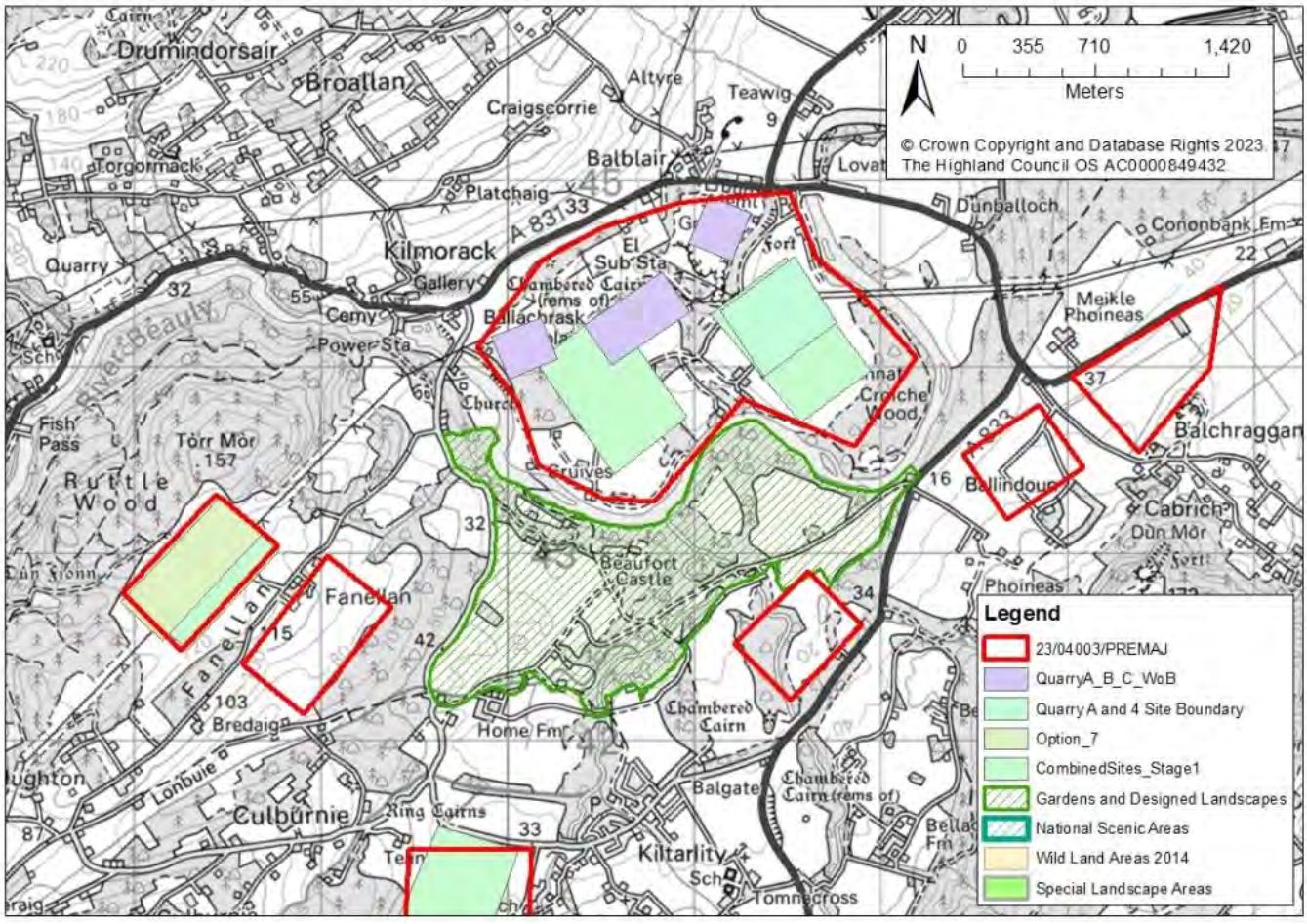

### Built Heritage



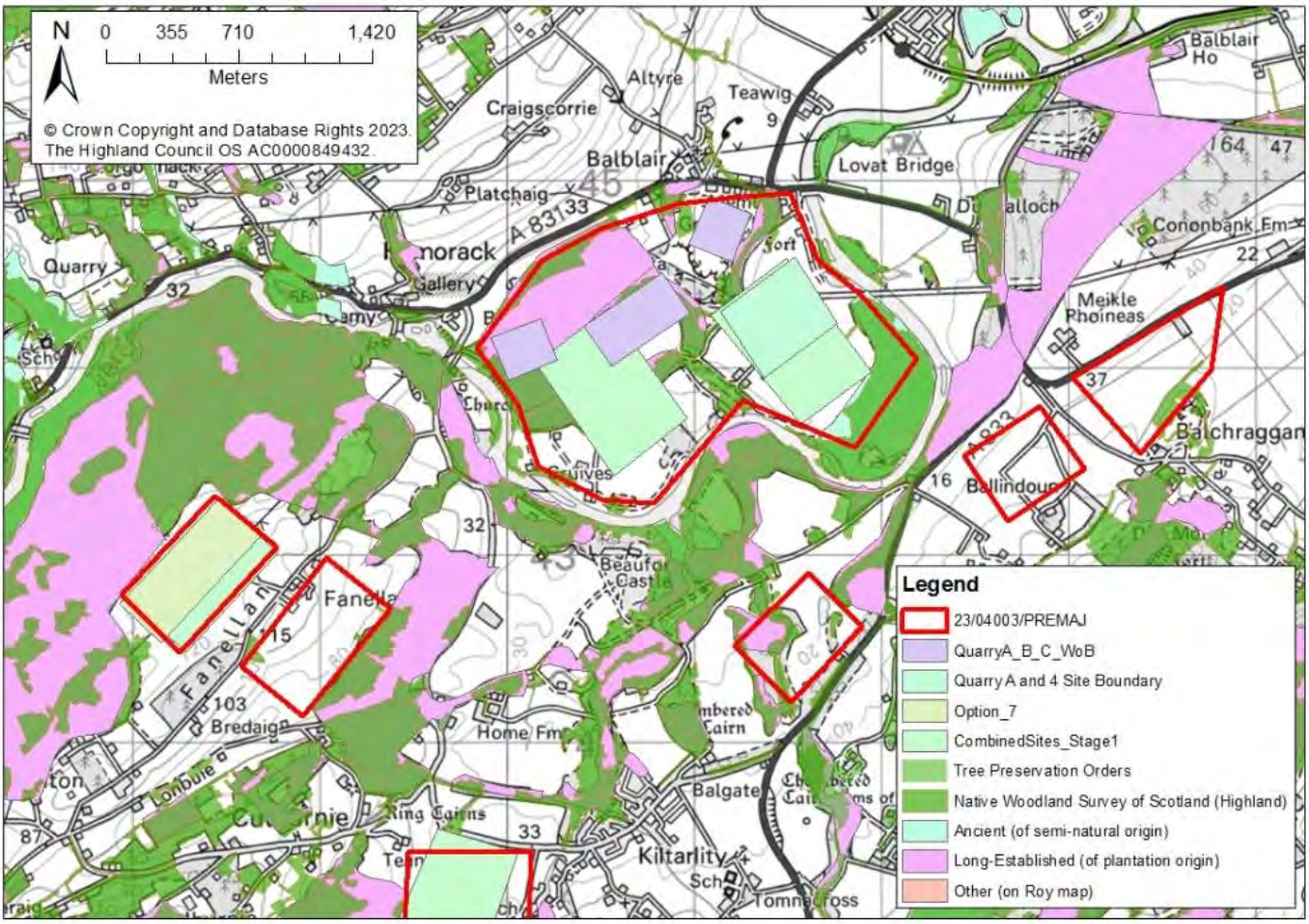
## Flood Risk



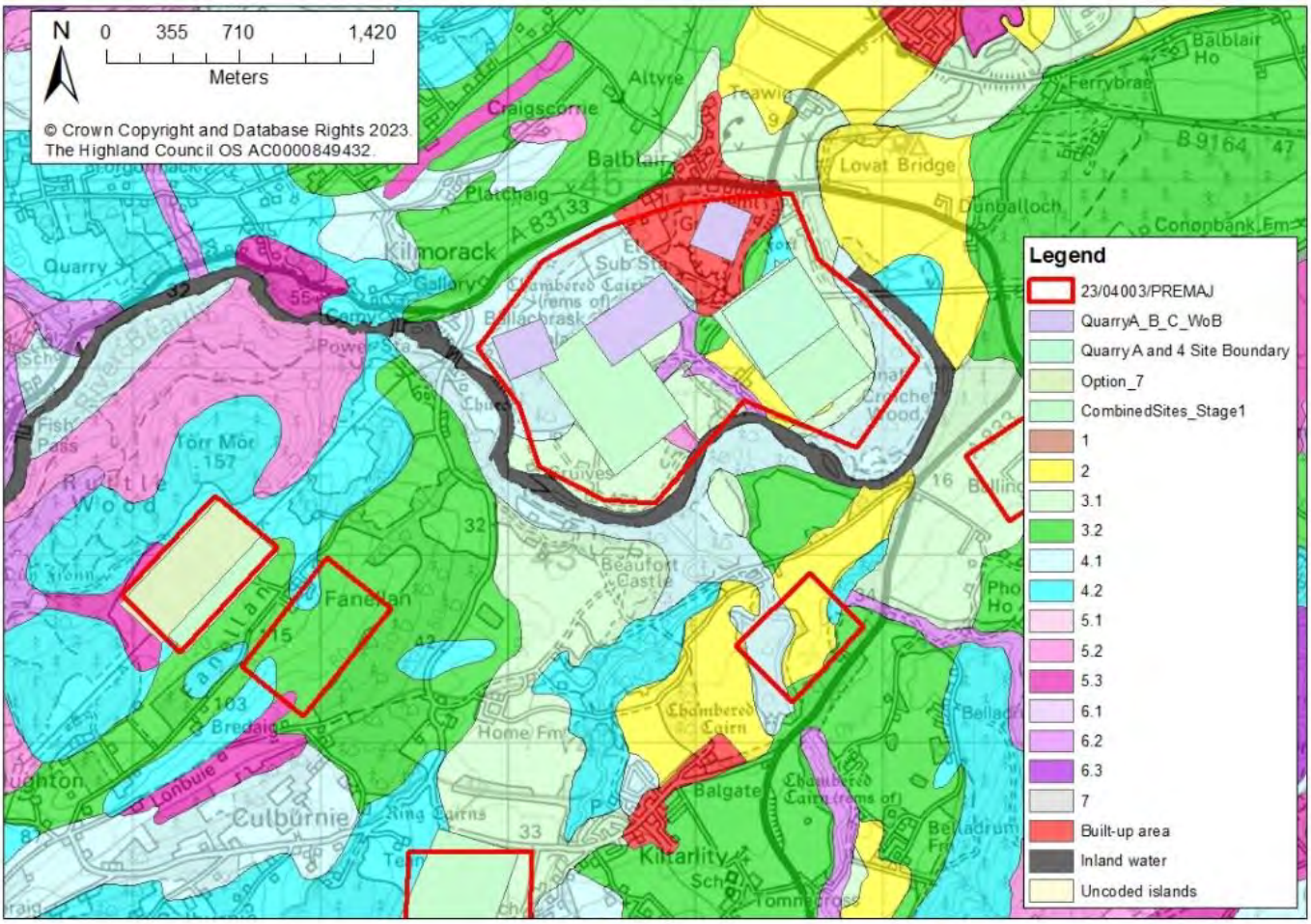

## Landscape



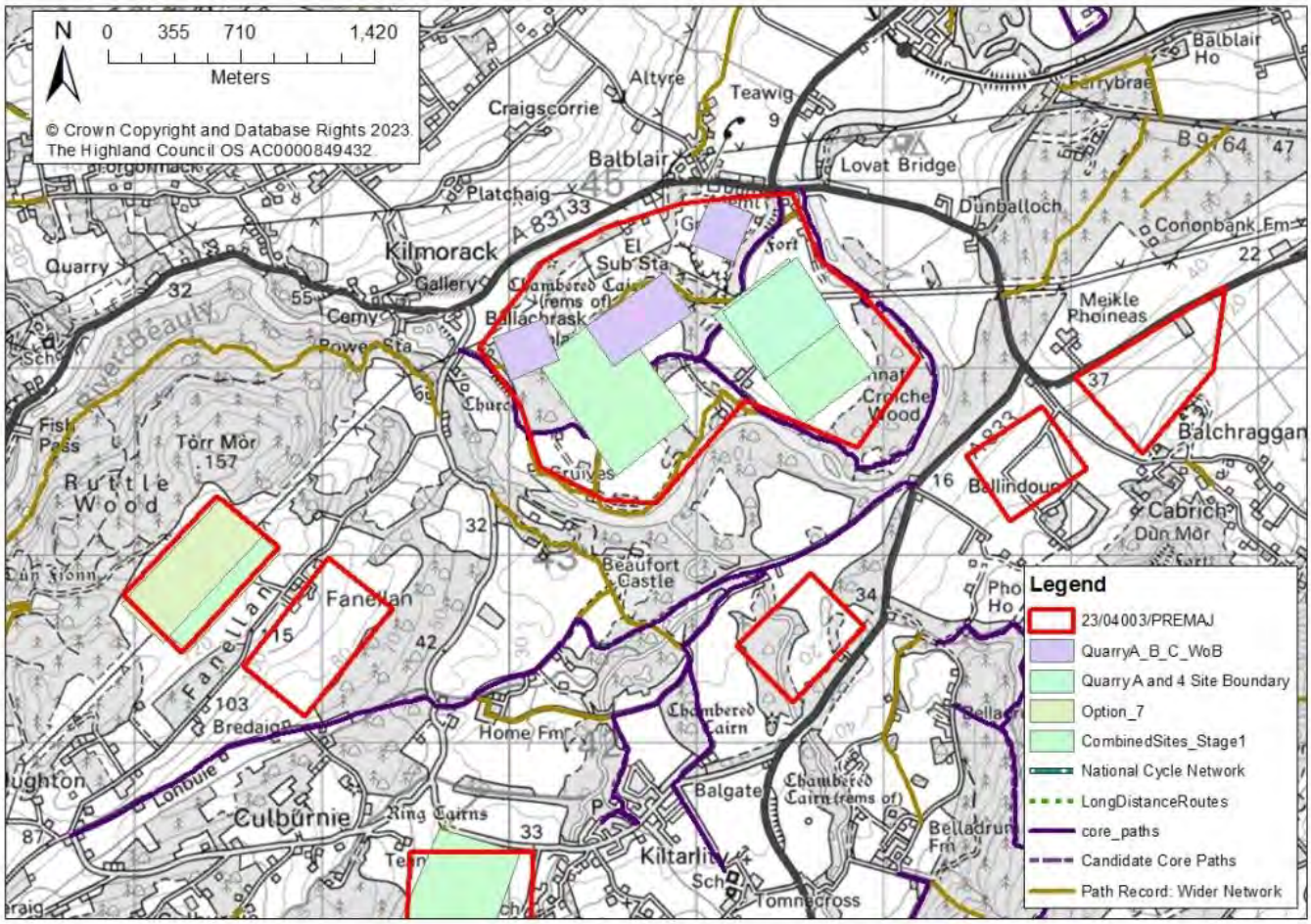
## Forestry




## Prime Agricultural Land

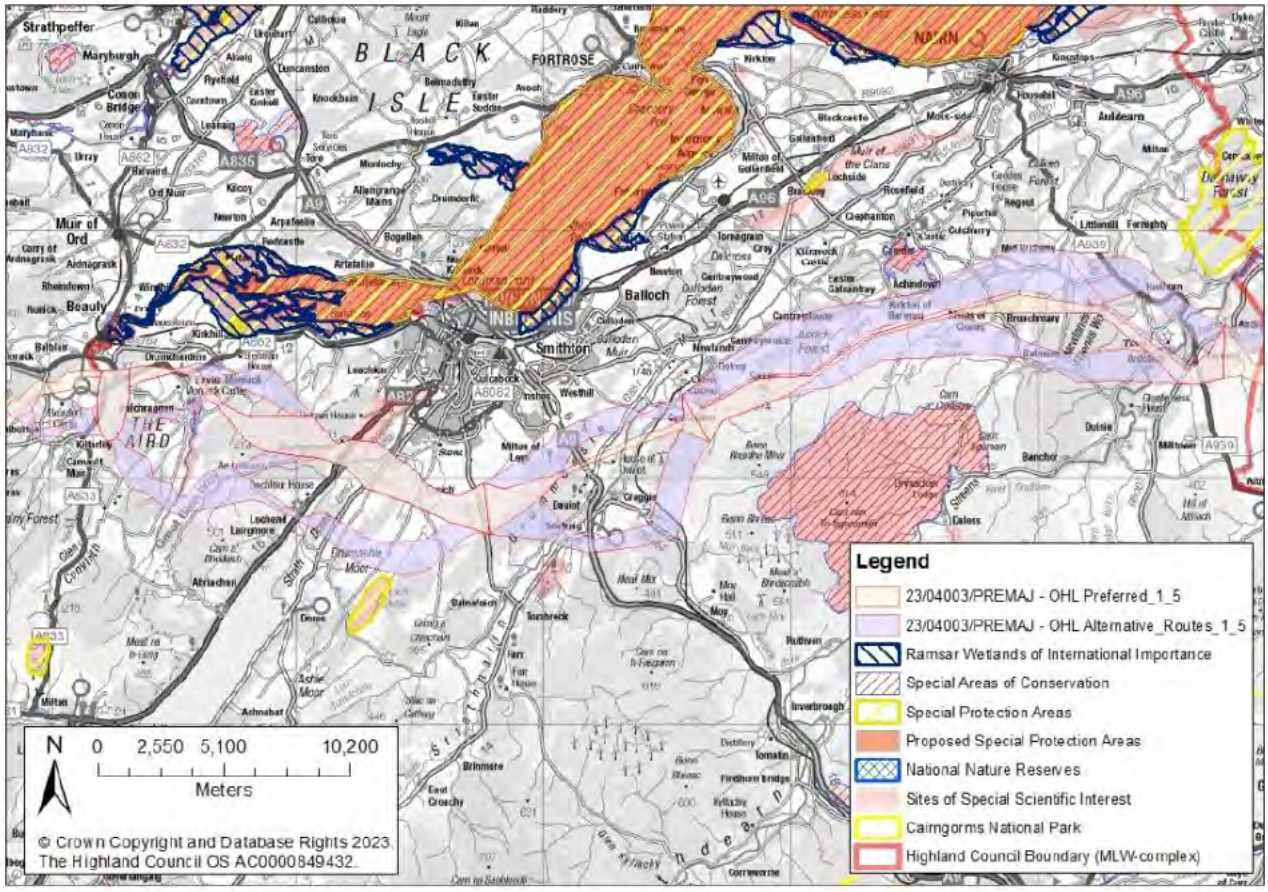


## Outdoor Access

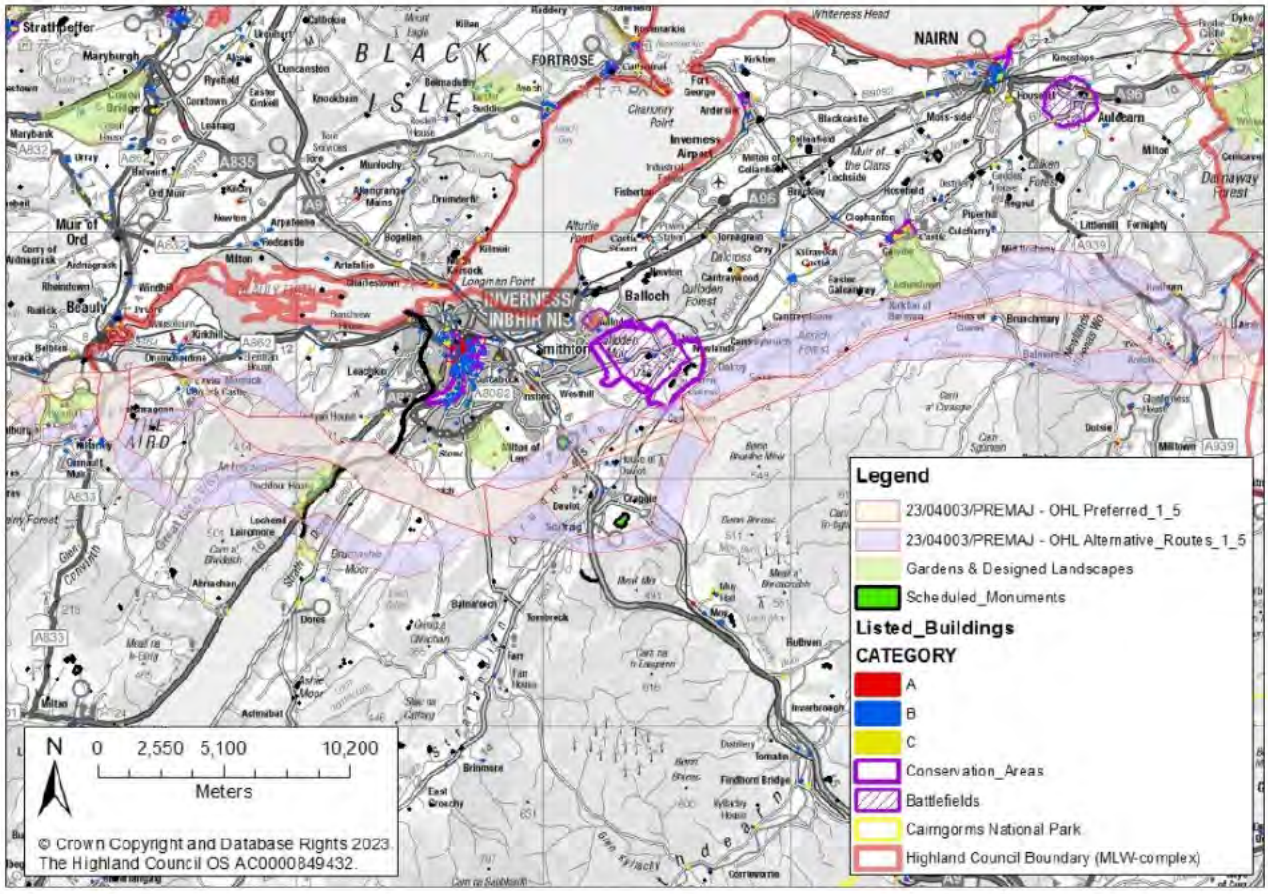


## Site Constraints Mapping – Overhead Line Beauly to Peterhead

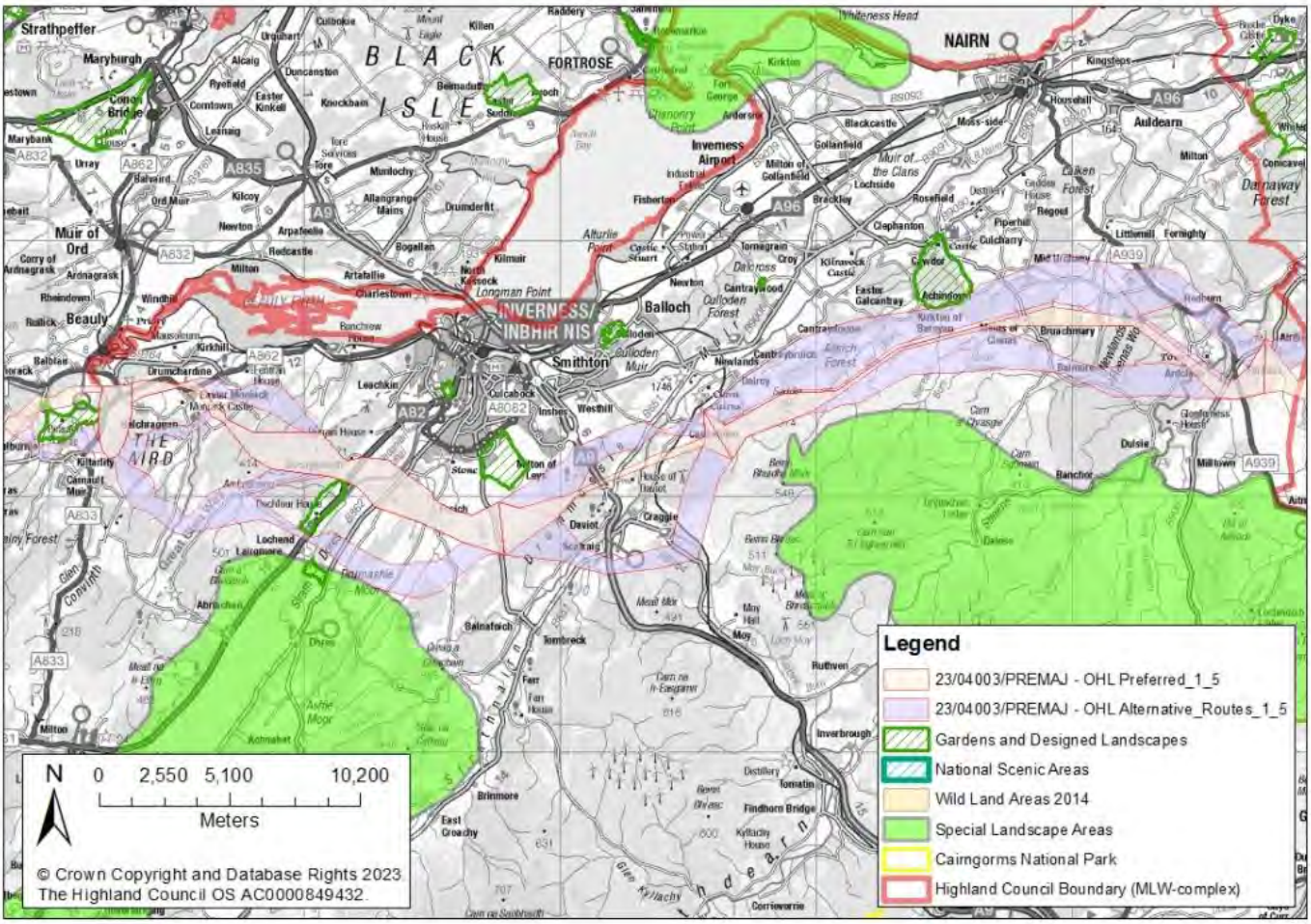
### Natural Heritage



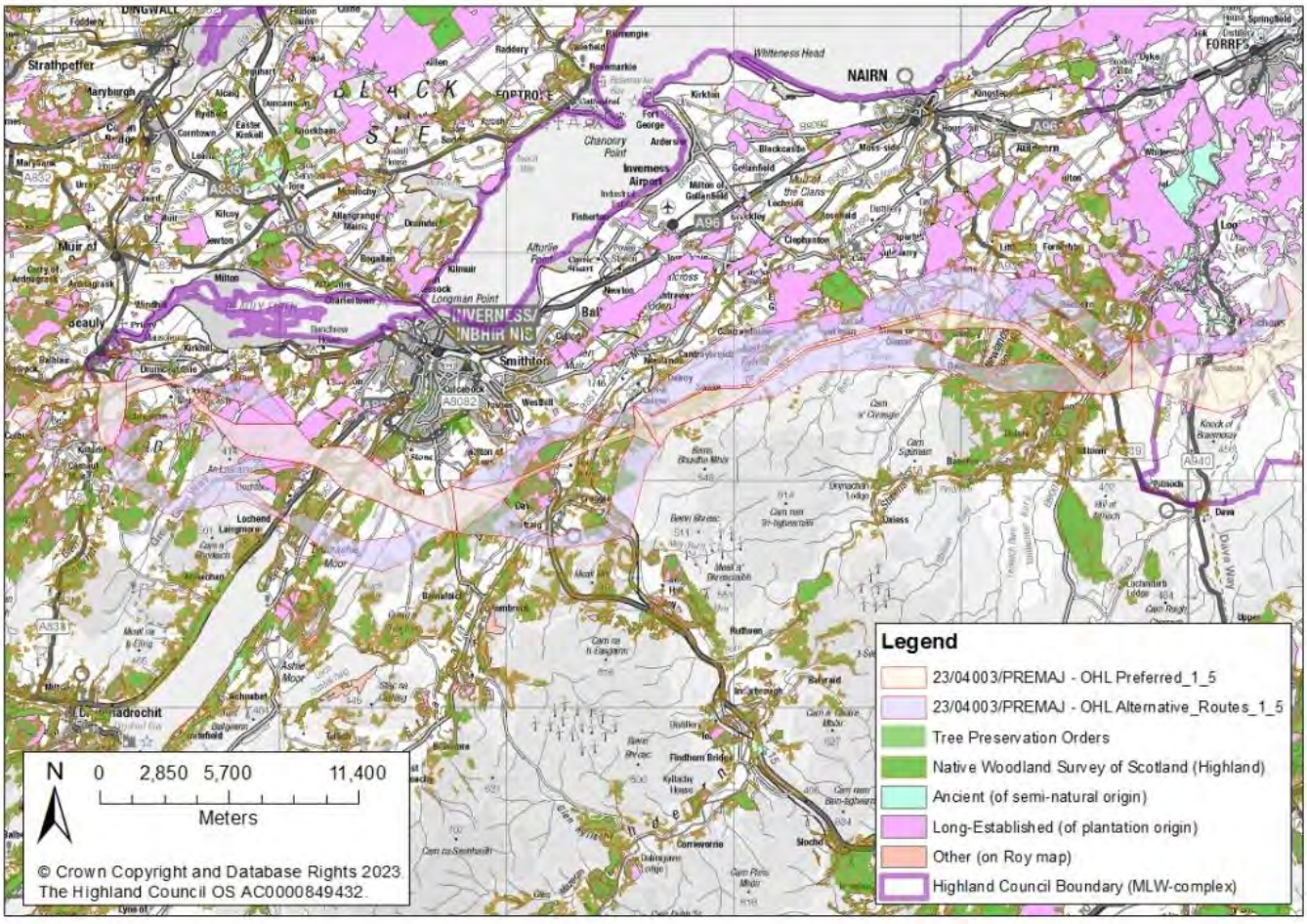

### Built Heritage



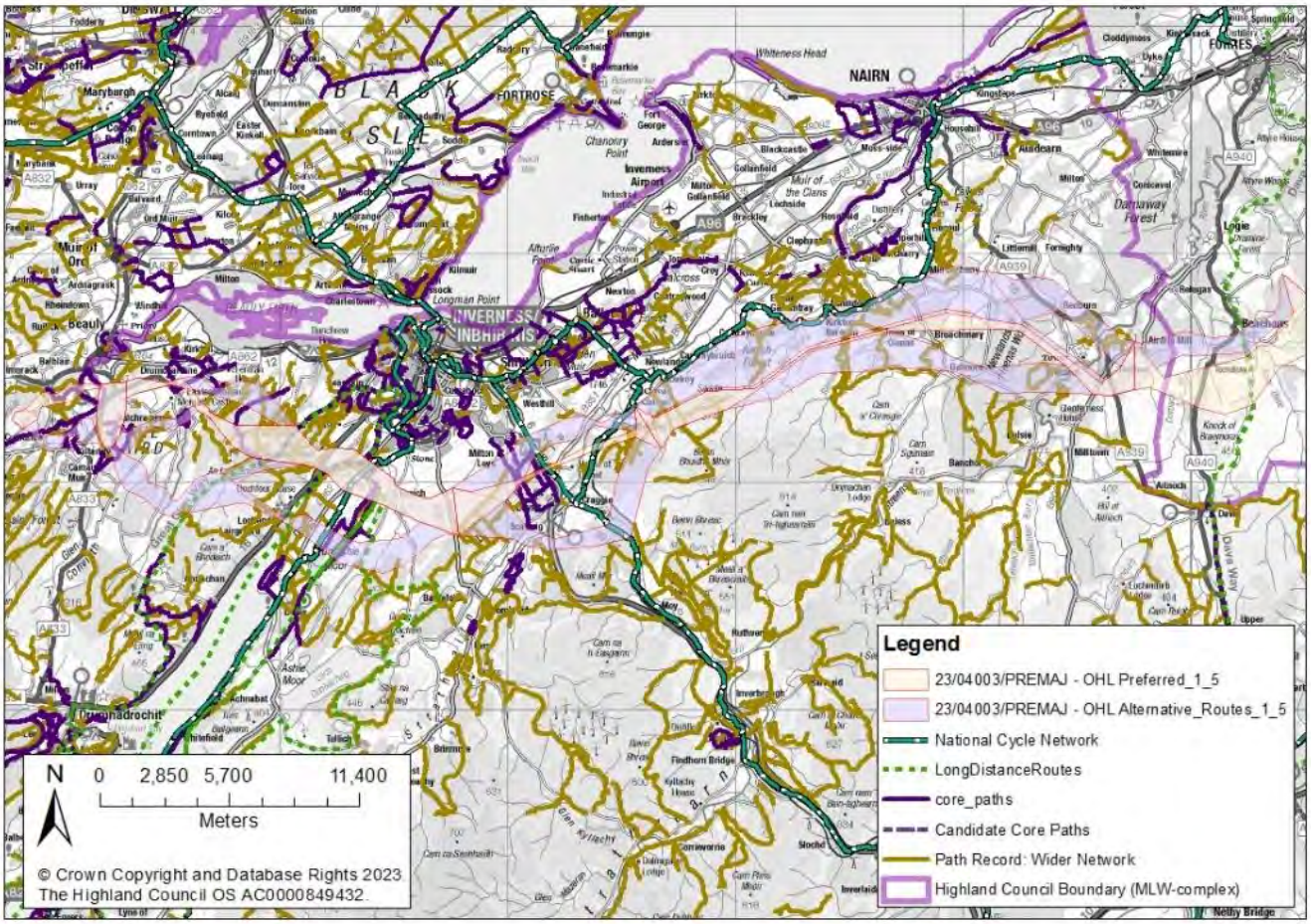
## Landscape




## Forestry



## Outdoor Access



| Supporting Information Requirements | | | |
|---|---|---|---|
| Abnormal Load Assessment | X | Open Space Strategy | |
| Access Management Plan | X | Operational Noise Assessment | X |
| Arboricultural Impact Assessment | X | Peat Management Plan | X |
| Archaeological Site Investigations | X | Planning Statement | X |
| Assessment of Impact on Historic Environment | X | Pre-Application Consultation Report | X |
| Aviation Impact Assessment | X | Private Water Supplies | X |
| Borrowpit Management Plan | | Protected Habitat Survey | X |
| Carbon Balance Assessment | | Protected Species Survey | X |
| Compensatory Planting Plan | X | Restoration / Decommissioning Plan | |
| Construction Noise Assessment | X | Retail Impact Assessment | |
| Construction Traffic Management Plan | X | Schedule of Mitigation | X |
| Contaminated Land Report | X | Shadow Flicker Assessment | |
| Design and Access Statement | X | Street Elevations | |
| Development Brief | | Structural Survey | |
| Drainage Impact Assessment | X | Sustainable Design Statement | X |
| Dust Survey | X | Swept Path Analysis | X |
| Electric Car Charging Strategy | | Transport Assessment | X |
| Flood Risk Assessment | X | Transport Statement | |
| Forest Residual Waste Strategy | | Tree Constraints Plan | X |
| GWDTE Assessment | X | Tree Protection Plan | X |
| Habitat Management Plan | X | TV / Radio Impact Assessment | |
| Landscape and Visual Impact | X | Vibration Assessment | |
| Landscape Maintenance/Management Plan | X | Visualisations and 3D Flythrough | X |
| Landscape Plan | X | Waste Strategy | |
| Masterplan | | Other (Please Specify): | |

**Planning Policy**

**National Planning Framework (NPF) 4**

Policy 1 Tackling the climate and nature crisis
Policy 2 Climate mitigation and adaptation
Policy 3 Biodiversity
Policy 4 Natural places
Policy 5 Soils
Policy 6 Forestry, woodland and trees
Policy 7 Historic assets and places
Policy 11 Energy
Policy 13 Sustainable transport
Policy 20 Blue and green infrastructure
Policy 22 Flood risk and water management
Policy 23 Health and safety
Policy 25 Community wealth benefits
Policy 33 Minerals

**Highland-wide Local Development Plan (HwLDP) (Adopted 2012)**

Policy 28 Sustainable Design
Policy 29 Design Quality and Place-making
Policy 30 Physical Constraints
Policy 36 Development in the Wider Countryside
Policy 42 Previously Used Land
Policy 51 Trees and Development
Policy 52 Principle of Development in Woodland
Policy 53 Minerals
Policy 54 Mineral Wastes
Policy 55 Peats and Soils
Policy 56 Travel
Policy 57 Natural, Built & Cultural Heritage
Policy 58 Protected Species
Policy 59 Other Important Species
Policy 60 Other Important Habitats and Article 10 Features
Policy 61 Landscape
Policy 62 Geodiversity
Policy 63 Water Environment
Policy 64 Flood Risk
Policy 65 Waste Water Treatment
Policy 66 Surface Water Drainage
Policy 67 Renewable Energy Developments
Policy 69 Electricity Transmission Infrastructure
Policy 72 Pollution
Policy 74 Green Networks
Policy 77 Public Access
Policy 78 Long Distance Routes

**Inner Moray Firth Local Development Plan (IMFLDP) (Adopted 2015)**

No site-specific policies apply. The IMFLDP is currently under review with the Proposed Plan having been published in March 2022.

**Highland Council Supplementary Guidance**

Developer Contributions (November 2018)

Flood Risk & Drainage Impact Assessment (Jan 2013)
Green Networks (Jan 2013)
Highland Historic Environment Strategy (Jan 2013)
Highland's Statutorily Protected Species (Mar 2013)
Highland Renewable Energy Strategy & Planning Guidelines (May 2006)
Physical Constraints (Mar 2013)
Roads and Transport Guidelines for New Developments (May 2013)
Special Landscape Area Citations (Jun 2011)
Standards for Archaeological Work (Mar 2012)
Sustainable Design Guide (Jan 2013)
Trees, Woodlands and Development (Jan 2013)

**Scottish Planning Policy and Guidance**

Draft Energy Strategy and Just Transition Plan (2023)
Scottish Energy Strategy (2017)
2020 Routemap for Renewable Energy (2011)
Energy Efficient Scotland Route Map, Scottish Government (2018)
Historic Environment Policy for Scotland, HES (2019)
PAN 1/2011 - Planning and Noise (2011)
PAN 60 – Planning for Natural Heritage (2008)
Circular 1/2017: Environmental Impact Assessment Regulations (2017)

**Policy Appraisal**

**Project Overview and Development Plan Policy**

The Development Plan comprises NPF4, HwLDP, IMFLDP and relevant supplementary guidance.

**National Planning Framework 4 (NPF4)**

NPF4 was adopted on 13 February 2023 and is now part of the Development Plan. NPF4 comprises three distinct parts:

**Part 1** - sets out an overarching spatial strategy for Scotland in the future. Outlining that Scotland is facing unprecedented challenges and that we need to reduce greenhouse gas emissions and embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing, and build a wellbeing economy while striving to create great places. Therefore, NPF4 sets out that choices need to be made about how we can make sustainable use of our natural assets in a way that benefits communities.

NPF4 outlines 18 national developments that support the plan's spatial strategy. National developments will be a focus for delivery, as well as exemplars of the Place Principle, placemaking and a Community Wealth Building (CWB) approach to economic development. Six of the national developments support the delivery of sustainable places. Among these is national development number 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure, which "supports electricity generation and associated grid infrastructure throughout Scotland, providing employment and opportunities for community benefit, helping to reduce emissions and improve security of supply." National development number 3 accords national development status to electricity transmission that includes b) New and/or replacement upgraded on and offshore high voltage electricity transmission lines, cables and interconnectors of 132kv or more, and/or c) New and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations. This proposal aligns with parts of both b) and c) and therefore, is classed as a national development.

The spatial strategy reflects existing legislation by setting out that decision making requires to reflect the long-term public interest. However, in doing so, it is clear that the decision maker must make the right choices about where development should be located, ensuring clarity is provided over the types of infrastructure that need to be provided and the assets that should be protected to ensure they continue to benefit future generations. To that end, the Spatial Priorities support the planning and delivery of sustainable places, which will reduce emissions, restore and better connect biodiversity; create liveable places, where residents can live better, healthier lives; and create productive places, with a greener, fairer, and more

inclusive wellbeing economy.

**Part 2** - sets out the National Planning Policy which cover three themes: Sustainable Places, Liveable Places, and Productive Places; within which there are a total of 33 policies and many of these consist of distinct sub-policies. These 33 national planning policies form part of the development plan and will be assessed along with the Council's LDP policies for development management decisions. The most relevant policies are outlined below.

**Part 3** - provides a series of annexes that provide the rationale for the strategies and policies of NPF4, which outline how the document should be used, and set out how the Scottish Government will implement the strategies and policies contained in the document. With Annex A: 'How to use this document' noting that the policies within Part 2 should be read as a whole and '…it is for the decision maker to determine what weight to attach to policies on a case-by-case basis….' It goes on to state that '…where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies….'.

Many of NPF4's policies are relevant to consideration of the proposal, but attention is particularly drawn here to the following policies:

**Policy 1 (Tackling the climate and nature crises)** which intends to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis. It requires 'significant weight' to be given to those crises. The 8th February 2023 Chief Planner letter provides specific advice on this policy and notes '…it will be for the decision maker to determine whether the significant weight to be applied tips the balance in favour for, or against a proposal on the basis of its positive or negative contribution to the climate and nature crises….'.

**Policy 3 (Biodiversity)** which intends to protect biodiversity, reverse biodiversity loss, deliver positive effects and strengthen nature networks. It should be noted that under NPF4 Policy 3, every development proposal has to maintain or improve the net biodiversity of a site.

**Policy 4 (Natural Places)** which intends to protect, restore and enhance natural assets making best use of nature-based solutions.

**Policy 7 (Historic assets and places)** which intends to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.

**Policy 11 (Energy)** which intends to encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS).

- **Section a)** notes development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported, including (ii.) enabling works, such as grid transmission and distribution infrastructure.

- **Section c)** confirms development proposals will only be supported where they **maximise net economic impact**, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

- **Section d)** requires that development proposals that impact on international or national designations will be assessed in relation to Policy 4.

- **Section e)** requires project design and mitigation to demonstrate how the following impacts are addressed:
- Impacts on communities and individual dwellings, including, residential amenity, visual impact, and noise;
- Significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable;
- Public access, including impact on long distance walking and cycling routes and scenic routes;

- Impacts on aviation and defence interests including seismological recording;
- Impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;
- Impacts on road traffic and on adjacent trunk roads, including during construction;
- Impacts on historic environment;
- Effects on hydrology, the water environment and flood risk;
- Biodiversity including impacts on birds;
- Impacts on trees, woods and forests;
- Proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;
- The quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and
- Cumulative impacts.

In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.

In the case of proposals for grid infrastructure, consideration should be given to underground connections where possible.

**Policy 20 (Blue and green infrastructure)** which intends to protect and enhance blue and green infrastructure and their networks.

**Policy 22 (Flood risk and water management)** which intends to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.

**Policy 23 (Health and Safety)** which intends to protect people and places from environmental harm, mitigate risks arising from safety hazards and encourage, promote and facilitate development that improves health and wellbeing.

**Policy 25 (Community wealth building)** which intends to encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels. While NPF4 considers national developments as a focus for delivery, they should also be exemplars of the community wealth building approach to economic development.

**Policy 29 (Rural Development)** which intends to encourage rural economic activity, innovation and diversification whilst ensuring that the distinctive character of the rural area and the service function of small towns, natural assets and cultural heritage are safeguarded and enhanced.

**Policy 33 (Minerals)** which intends to support the sustainable management of resources and minimise the impacts of the extraction of minerals on communities and the environment.

**Highland-wide Local Development Plan (HwLDP) (2012)**

HwLDP was adopted in 2012 and sets out a range of planning policies applicable for the whole Highland Council area. HwLDP continues to be used alongside NPF4, until it is replaced by a new-style LDP. The Council notes that legislation indicates that if there is incompatibility between the LDP and the NPF, whichever is the more recent shall prevail. That requirement does not take away from the fact that the HwLDP must, whilst still part of the adopted Development Plan, be part of the consideration and a number of policies could be relevant.

The HwLDP policies that will be particularly key to this proposal include:

- *HwLDP Policy 69 (Electricity Transmission Infrastructure)* Proposals for overground, underground or sub-sea electricity transmission infrastructure (including lines and cables, pylons/ poles and vaults, transformers, switches and other plant) will be considered having regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption. Subject to balancing with this consideration, and taking into account any proposed mitigation measures, the Council will support proposals which are assessed as not having an unacceptable significant impact on the environment, including natural, built and cultural heritage features. In locations that are

sensitive, mitigation may help to address concerns and should be considered as part of the preparation of proposals. This may include, where appropriate, underground alternatives to overground route proposals. Where new infrastructure provision will result in existing infrastructure becoming redundant, the Council will seek the removal of the redundant infrastructure as a requirement of the development.

- *HwLDP Policy 57 (Natural, Built and Cultural Heritage)* - All development will be assessed taking into account the level of importance and type of heritage features, the form and scale of development and any impact on the feature and its setting. HwLDP provides more details on the criteria which apply to each of the three categories of importance: international, national and local/regional. The applicant will be required to demonstrate that there is no significant impact on the features covered by this policy.
- *HwLDP Policy 61 (Landscape)* requires new development to reflect the landscape characteristics and special qualities identified in the relevant, refreshed and published (2019) NatureScot (formerly SNH) Landscape Character Assessments (LCAs). The LCAs are a starting point on which to base assessment of landscape and visual impact. It is important to set out who the visual receptors of the development are, what the landscape impacts are and how these two factors relate. https://www.nature.scot/professional-advice/landscape/landscape-character-assessment

**The preparation of a new-style Highland Local Development Plan (HLDP)**

It is likely that through 2023 the Council will focus primarily on evidence-gathering for the new HLDP, with the tentative programme including an Evidence Report in quarter 3 2024 and subsequent Gate Check, with Proposed Plan stage in 2025. We will issue an update to our Development Plans Newsletter (www.highland.gov.uk/developmentplansnewsletter) in early 2024 with any updates to timescales. The HLDP will, once adopted, replace all our current LDPs. As part of this programme of work, the Council will review the coverage and content of its current suite of Supplementary Guidance, to establish which aspects should be covered within the new Local Development Plan itself, which aspects should be covered within non-statutory planning guidance and any aspects no longer required.

**Inner Moray Firth Local Development Plan (IMFLDP) (2015)**

The 'Area' Local Development Plan covering the location of the proposals is the Inner Moray Firth Local Development Plan (IMFLDP). It should be noted that the Inner Moray Firth Local Development Plan is under review, with a Proposed Plan now at the advanced stage of Examination and adoption of the finalised plan anticipated by mid 2024. The Proposed Plan is a material consideration.

The Highland Council 'Area' Local Development Plans' focus is on the regional and settlement strategies for their respective areas and identify specific site allocations and as such, much of their content is not directly relevant to an energy transmission proposal, particularly one that is proposed to be located in the countryside, outwith towns and villages.

However, certain aspects of the strategies for the local area and settlements may highlight priorities for the local area that should be taken into consideration when designing the development or help to inform plans for community engagement and/or community benefit.

The Area Local Development Plans confirm boundaries (including any refinements) of the Special Landscape Areas (SLAs) within their plan areas. The SLA citations webpage provides the most up to date information on SLAs.
www.highland.gov.uk/downloads/file/2937/assessment_of_highland_special_landscape_areas

**Inner Moray Firth Proposed Local Development Plan 2 (IMFpLDP2)**

The Council is currently working to replace IMFLDP. The consultation closed on the proposed plan stage in summer 2022, officers have since reviewed comments received and reported these and the Council's response to them to relevant Council Committees. The Plan has been submitted to Scottish Ministers for Examination. Given the advanced stage of IMFpLDP2, it is considered the 'settled view' of the Council and therefore carries weight in the decision-making process. This plan's focus is again on identifying specific site allocations but includes a number of overarching 'general policies' which will apply to all developments.

The most relevant to this proposal is Policy 2 (Nature Protection, Preservation and Enhancement). This policy outlines that National, Major and EIA Developments must conserve and enhance biodiversity, including nature networks within and adjacent to the site, so that they are in a demonstrably better state than without intervention, including through future management. To achieve this, the policy outlines that

developments must:

- be based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats or species;
- wherever feasible, integrate and make best use of nature-based solutions, demonstrating how this has been achieved;
- be supported by an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;
- provide significant biodiversity enhancements, in addition to any proposed mitigation.

**Aviation**
The developer's preferred and/or alternative routes options for the proposed overhead line from Beauly to Peterhead passes through a number of safeguarding areas in relation to Inverness Airport, where all development exceeding 10 metres height requires consultation with CAA and HIAL.

**Dwellinghouses**
Particular care should be taken to identify sensitive receptor locations, especially dwellinghouses and to assess effects of proposals in that regard.

**Community Wealth Building**
While NPF4 considers national developments as a focus for delivery, they should also be exemplars of the community wealth building approach to economic development.

The intent of NPF4 Policy 25: Community Wealth Building is to encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels. Policy 25 supports the following proposals:

- Development proposals which contribute to local or regional community wealth building strategies and are consistent with local economic priorities will be supported. This could include for example improving community resilience and reducing inequalities; increasing spending within communities; ensuring the use of local supply chains and services; local job creation; supporting community led proposals, including creation of new local firms and enabling community led ownership of buildings and assets.
- Development proposals linked to community ownership and management of land will be supported.

www.gov.scot/publications/national-planning-framework-4/

A report to the meeting of The Highland Council on 29 June 2023 provided an introduction to: the background and principles of Community Wealth Building; the work already being undertaken which contributes towards community wealth building; and an update on the proposed approach being taken to develop a Community Wealth Building Strategy for Highland Council.
www.highland.gov.uk/download/meetings/id/81834/item_11_developing_a_community_wealth_building_strategy

**Community Benefit**
Whilst Community Benefit is a separate issue to planning, the Council wants to make sure that local communities benefit directly from the use of their local resources and are compensated for the disruption and inconvenience associated with large scale development work. Guidance is provided in the Council's Community Benefit policy. Please be aware that the Council's Community Benefit Policy may be reviewed in the near future.

www.highland.gov.uk/communitybenefitpolicy

**Natural Heritage**

**Landscape**
Policy 61 of the HwLDP requires new development to reflect the landscape characteristics and special qualities identified in the relevant, refreshed and published (2019) Nature Scot (formerly SNH) Landscape Character Assessments. The Landscape Character Assessments are a starting point on which to base assessment of landscape and visual impact. It is important to set out *who* the visual receptors of the

development are, *what* the landscape impacts are and *how* these two factors relate.

Each of the developer's 'shortlisted' five option sites for accommodating the substation and/or the converter station are each within landscape character type 'Enclosed Farmland' or within landscape character type 'Farmed River Plains'. Landscape character areas here are relatively narrow however and sometimes backdropped by other landscape character types close by.

It is noted that the developer proposes that the 400 kV overhead line would use pylons significantly larger than many found in these parts of Highland currently. It is further noted that in substantial parts the preferred route follows alongside an existing, smaller overhead line or is set away from but still in the vicinity of the existing lines. It will be helpful to have clarity, as proposals move forward, as to whether the proposed overhead line would be entirely additional to those existing or whether any of the existing infrastructure would be removed. The pre-application information does mention removal of a 132 kV connection between Beauly and Knocknagael. Full consideration of any available options to remove existing line infrastructure is required. Each 'option route' for the overhead line passes through a number of different landscape character types. Understanding the consequences of these factors for the effects of the proposed development will be important, particularly at the transitions between landscape character types and also cumulative effects with other infrastructure.
www.nature.scot/professional-advice/landscape/landscape-character-assessment

**Landscape Sensitivity**
Within your landscape and visual impact assessment (LVIA), consideration of sensitive receptors will need to include those who reside in the area (including residential amenity assessment) and those who visit it, with receptor locations particularly including areas of settlement, transport routes, and visitor and recreational attractions and routes. If you proceed towards application then detailed information and assessment will be required in due course, in order to establish the significance of any impacts. You are encouraged to explain the design iterations throughout the process and how they have responded to assessment of impacts.

**Special Landscape Areas**
Proposals must have regard to the citations for SLAs that summarise key characteristics, qualities, sensitivities, and measures for enhancement. These citations will be used to assess impacts of proposals. A number of SLAs could be affected, particularly by the Beauly to Peterhead overhead line element of the proposals as various route options including the developer's initial preferred option pass close to some SLAs.

www.highland.gov.uk/downloads/file/2937/assessment_of_highland_special_landscape_areas

**Landscape and Visual Impact, NatureScot**
Our engagement with these projects will focus on the potential for adverse effects on sites with statutory protection for their natural heritage value. We recognise however that substation proposals are large scale developments with potential to impact on a wide range of natural heritage interests.

The proposed substations at Spittal, Loch Buidhe and Beauly are not expected to result in significant effects on landscapes of national importance. We would not look to comment further on this aspect of the proposal.

The OHL will pass through several areas designated for their special landscape qualities, including National Scenic Areas (NSAs), Wild Land Areas (WLAs) and areas of regional distinctiveness.

Should route options result in significant adverse effects to the qualities of a NSA, WLA or areas of regional distinctiveness then this may lead to a NatureScot objection.

**Protected Areas, NatureScot**
There are many protected sites that are within or adjacent to route options, including your preferred routes. There are several sites that are further from the proposed routes but due to the nature of their interests (primarily birds) may still be impacted by your proposals. Your mapping has identified all these sites and we would like to offer some comments at this pre-application stage to help ensure that as alignment decisions are made these interests can be fully considered and the potential impacts robustly assessed.

Cumulative impacts from other proposals could give rise to significant adverse effects on protected area

interests and will need to be assessed. The preferred sites are located within or adjacent to protected areas and have potential to cause significant effects.

Operation and maintenance activities have potential to impact on protected areas for example ongoing wayleave management can impact habitats, and maintenance activity on towers or conductors could damage habitats and cause disturbance to species. A site-specific plan for each protected area affected spanning the lifetime of the infrastructure will ensure that any impact is minimised to help avoid the risk of compromising the integrity of protected sites in the long-term.

**NatureScot welcome ongoing liaison with you and your consultants regarding effects on protected areas and the surveys required to assess them.**

**Habitats Regulations Appraisal (HRA)**
In order to carry out an HRA the competent authority must have sufficient details about all aspects of the proposal and how it will be constructed, operated and maintained. Information should be gathered about the European sites that could potentially be impacted, including their qualifying interests and conservation objectives. The definitive source for qualifying interests is:

- Qualifying Interest List for SACs
- Citation for SPAs

NatureScot are happy to continue engagement with SSEN on the gathering and production of information to inform the HRA. An HRA proforma is available to help guide competent authorities through the process and more information is available on our Habitats Regulations Appraisal webpages.

**Ornithology, NatureScot**
Cromarty Firth SPA – Osprey associated with the Cromarty Firth SPA and Inner Moray Firth SPA are known to nest in the wider area including at Aigas George which lies in close proximity to the proposed substation and converter station at Kinellan. There is a high potential for disturbance to Osprey during construction, especially is works are to take place within the Osprey breeding season (February to September). Survey data will be crucial to determine likely effects to Osprey breeding in the wider area and inform species mitigation plans that may mean working outwith the breeding season if it is not possible to avoid disturbance. No direct or indirect impacts to non-breeding birds, or SSSI/RAMSAR habitats are anticipated.

Glen Affric to Strathconon SPA – The proposed substation and converter station lies approximately 10km from this SPA. There are unlikely to be any direct or indirect impact to breeding Golden Eagle as a result of this proposal.

Beauly Firth SSSI – No direct or indirect impacts to non-breeding birds or SSSI habitats are anticipated.

**Peatlands and Carbon-Rich Soils, Naturescot**
We have published new guidance (June 2023) to help NatureScot staff provide developers, planning authorities and Scottish Government with consistent advice on assessing the effects of development proposals on peatland, carbon-rich soils and priority peatland habitat: Advising on peatland, carbon-rich soils and priority peatland habitats in development management.

This is relevant guidance for developers to be aware of because it sets out the information that must be provided with the application and Environmental Impact Assessment Report (EIAR) to enable assessment of effects.

The approach set out in this guidance aligns with the National Planning Framework 4 (NPF4) policies which are relevant to development proposals on peatland, carbon-rich soils and priority peatland.

A key focus will be helping to ensure that development is designed and constructed to follow the mitigation hierarchy set out in NPF4 and that, in addition, biodiversity enhancement is delivered through peatland restoration.

The above guidance outlines the framework that NatureScot will use to consider whether the impact of development on carbon-rich soil and priority peatland habitats may raise issues of national interest, and potentially warrant an objection.

To help assess when a proposal could have a significant effect that NatureScot will consider as raising issues of national interest, we have developed an assessment framework based on guidelines for the selection of SSSI for bogs.

We request that this Template is completed by the applicant and submitted with the application. Where the development infrastructure (including a 250 m buffer) meets the criteria in the template, an additional map should be provided showing its locations (*e.g., Sphagnum species*) in relation to the development. If available, shape files showing the location of infrastructure, NVC communities and peat depths should also be supplied to us to aid our assessment. Full details are available in our guidance.

The routes have been selected, where possible, to avoid priority peatland habitat as mapped through NatureScot's Carbon and Peatland 2016 mapping but there are still sections that could impact on priority peatland and carbon-rich soils. Detailed studies will be required to determine its quality and sensitivity.

Protecting peatland habitats and restoring them is likely to be a significant part of this project and we would welcome early and ongoing liaison to ensure impacts on good quality habitats can be avoided and minimised through iterative design. There is also a significant wealth of expertise shared through our Peatland site https://www.nature.scot/climate-change/nature-based-solutions/peatland-action-project.

**Woodland, The Highland Council**
The following policies will apply to the proposed development:

Policy 6 of the National Planning Framework 4 and Policy 52 of the HwLDP both make reference to the Scottish Government policy on the Control of Woodland Removal which aims to minimise the permanent loss of woodland associated with a change in land use. Woodland removal will only be supported where development proposals achieve a clear and significant public benefit. In this situation, there will generally be a requirement to provide compensatory planting.

Greater protection is given to certain woodland types and these are outlined in NPF4 Policy 6.b.i-iii. Of particular importance in 6.b.i. which states that:

*a) Development proposals that enhance, expand and improve woodland and tree cover will be supported.*

*b) Development proposals will not be supported where they will result in:*

*i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;*

*ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy;*

*iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy;*

*iv. Conflict with Restocking Direction, Remedial Notice or Registered Notice to Comply issued by Scottish Forestry.*

*c) Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered.*

*d) Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported where the enhancement and improvement of woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design.*

This is a significant constraint which offers no flexibility and therefore needs to be carefully considered when assessing options for the overhead powerline (OHL).

The proposed OHL should aim to avoid woodland and trees of high biodiversity value. Where this is not possible, the operating corridor (OC) must be kept as narrow as possible through the restructuring of woodland. The Council are aware that the OC can vary from as much as 80 metres (40m either side of the OHL) through commercial woodland, to as little as 30 metres (15m either side of the OHL) in native woodland. The need to rationalise felling back to a windfirm edge (in commercial woodland) may involve a significant amount of additional felling.

Where felling is considered unavoidable, these areas should be restocked with native species which enables the OC to be reduced to the minimum width, therefore reducing the amount of woodland removal.

Where a permanent removal of woodland occurs, compensatory planting will be required to help mitigate for this loss of habitat. Details of compensatory planting must be provided in support of any planning submission. This must identify a suitable area of land which has been assessed by Scottish Forestry under the Forestry EIA screening process. Compensatory planting proposals must then be developed in consultation with Scottish Forestry and any other relevant stakeholders to demonstrate that it is a viable scheme.

Compensatory planting must be of at least the equivalent area to that which is being removed and, in some cases, an enhanced area of compensatory planting will be required. It should also be noted that compensatory planting should be of a similar woodland type (commercial/native) to the one being removed.

Any off-site compensatory planting will need to be secured through a legal agreement between the Council, the applicant and landowner(s).

Where woodland removal or restructuring affects an area under an approved Long Term Forest Plan (LTFP), then this will need to be amended to account for any approved changes.

It is important that any related operations are integrated, such as woodland restructuring, biodiversity enhancement, compensatory planting, Habitat Management Plans and Long-Term Forest Plans.

The Highland-wide Local Development Plan (April 2012) explains the Highland Council's vision and sets out how land can be used by developers for the next 20 years. The HwLDP Policies 51 and 52 highlight the multiple benefits provided by trees and woodlands throughout the Highlands and in recognition of this there is a strong presumption in favour of protecting the existing woodland resource.

**Impact on Habitats, NatureScot**

NPF4 sets out new requirements for development to deliver positive effects, primarily under Policy 3. For national and major developments, or those subject to EIA, Policy 3b notes that proposals will only be supported where it can be demonstrated that they will conserve, restore and enhance biodiversity, including nature networks, so they are in a demonstrably better state than without intervention. The policy requires that significant biodiversity enhancements are provided, in addition to any proposed mitigation. Only when actions result in biodiversity being left in a better state than before development are positive effects secured.

Our Developing with Nature guidance has been prepared, in discussion with Scottish Government, to support local development applications. It sets out a number of common measures to enhance biodiversity. For national, major and EIA developments, more detailed assessment and more ambitious measures are likely to be required. The Scottish Government is developing separate guidance on Policy 3 to support delivery of biodiversity enhancement from these larger scale developments. In the meantime, aspects of our *Developing with Nature guidance* can usefully inform how to take account of biodiversity in development, including ensuring future management and monitoring maintains the biodiversity enhancements in the long term.

The Applicant should explore and identify opportunities for biodiversity enhancement as early as possible, including through discussion with key stakeholders. Within the EIA report, information on predicted losses, proposed compensation and delivery of additional positive effects should be clearly summarised. The information must be sufficient to allow the consenting authority and relevant stakeholders to see clearly how effects will be addressed, and compensation and enhancement delivered.

**Summary, NatureScot**

We recognise that the proposal falls within the National Planning Framework (NPF4) list of national

developments. However, where the project is unable to avoid direct or indirect effects on protected areas, we are likely to object if these effects will adversely affect their integrity and cannot be mitigated satisfactorily. Interests in Development Proposals: https://www.nature.scot/doc/guidance-notice-no-019-identifying-natural-heritage-issues-national-interest-development-proposals (Updated May 2023 to reflect NPF4).

We request that where project infrastructure is unable to avoid protected areas that site specific plans detailing all aspects of construction, operation and maintenance and the mitigation needed to avoid adverse effects are produced and submitted with relevant applications.

We acknowledge your reasoning for selecting the preferred sites and recognition that these still present the potential to impact on internationally and nationally important nature conservation sites. We have limited our comments here to the preferred sites.

All routes identified have potential for significant adverse effects on important natural heritage interests. We understand your reasoning for selecting the preferred route(s) but these still have potential to impact on internationally and nationally important nature conservation sites and at this stage it's unknown if impacts can be fully mitigated.

Our feedback aims to highlight where we consider from the information currently available that there is increased risk to protected areas and, where known, what the implications might be for routing through these. We offer this advice to help guide alignment options going forward.

The scale and nature of this proposal is such that its effects on the natural heritage have potential to be significant. Your consultation document identifies several natural heritage issues along your preferred and non-preferred route options.

We have carefully reviewed the detail and considered the potential for the proposal to impact on key natural heritage interests including, but not necessarily limited to, impacts on several nationally and internationally important sites for nature conservation, the Dornoch Firth National Scenic Area, and peatlands and carbon-rich soils.

We consider the sensitive natural heritage interests, listed above, are likely to be affected by powerline development. **We will consider objecting if the impacts on these raise issues of national interest that cannot be adequately mitigated.** We would do so in accordance with our guidance on Identifying Natural Heritage Issues of National Interests in Development Proposals: https://www.nature.scot/doc/guidance-notice-no-019-identifying-natural-heritage-issues- national-interest-development-proposals (Updated May 2023 to reflect NPF4).

**Design Evolution**

HwLDP Policy 29 Design Quality and Place requires development to be designed to make a positive contribution to the architectural and visual quality of the area. Furthermore, development proposals must demonstrate sensitivity and respect towards the local distinctiveness of the landscape, architecture, design and layouts of their proposals.

**Design and Access Statement**
The Design and Access Statement should outline the design principles and concepts that have been applied to the development and:

(i) explain the policy or approach adopted as to design and how any policies relating to design in the development plan have been taken into account.
(ii) describe the steps taken to appraise the context of the development and demonstrates how the design of the development takes that context into account in relation to its proposed use.
(iii) state what, if any, consultation has been undertaken on issues relating to the design principles and concepts that have been applied to the development; and what account has been taken of the outcome of any such consultation.

Further advice on the preparation of design statements is contained in the Council's advice note on Design and Access Statements and Scottish Government Planning Advice Note 68.

**Amenity**

**Contaminated Land**

There are no known potential contaminated land issues at locations for substation site Options 1, 2, 3, 4, 5, 5A, 6, 7, 8, 11, 12, 13 and 14.

There is potentially a slight overlap of the Option 11A location with Balchraggan Quarry, which may have been subject to infilling and the history of this quarry should be checked prior to construction of infrastructure in the vicinity.

Option 9 is in the vicinity of a former works building, and historic activities within this area should be given further consideration prior to development.

**Noise Impacts – Construction**

It is understood that the location of the proposed substation has yet to be finalised with two main options currently being considered, including: 1) Option 7 the substation station and HVDC converter station sited at Fanellan; and 2) Option 7, having the substation located here, and the HVDC converter station being located within the existing Balblair Quarry. In addition, both options will require modifications and connections to the existing substation at Balblair.

As the applicant is aware, noise from the existing Balblair Substation has been the subject of numerous complaints from residents and resulted in our Service serving a Noise Abatement Notice under the Environmental Protection Act 1990.

Significant mitigation works have since been undertaken at the substation site and noise from the substation no longer constitutes a statutory nuisance. Albeit it is only borderline acceptable in the Balblair village area. Our Service's noise consultant who undertook the final assessment of the Abatement Notice advised *"any increase in the regularity of the of periods of higher noise from the existing substation, or increases in the LAeq,T, increases in the Leq,T 100Hz-500Hz or increase in the perceptibility of acoustic characteristics at properties in Balblair it is likely the noise to exceed the threshold of nuisance i.e., constitute a statutory nuisance."*

In addition, as part of the previous extension to Balblair substation, SSEN advised that the scheduled improvements in the transmission network over coming years will also reduce the contribution and operation of the SVC at Balblair and would provide benefits in noise emissions from the substation.

It is, therefore, critical that any connections or modifications to the existing Balblair substation made as part of the development, or under any permitted development, does not contribute to the existing noise levels. Any modifications should in effect reduce the overall noise from the substation.

In addition, the quarry is in close proximity to Balblair substation. If this site is used for the HDVC convertor station, then it is essential that it does not add to the existing noise levels. Any noise assessment for this proposal must consider the accumulative noise from the existing Balblair substation and the proposed new HDVC converter station.

Regardless of which site location is finally chosen the applicant will be required to submit a detailed noise assessment undertaken by a competent person, which should include, but is not limited, to the following: -

- A description of the proposed development in terms of new noise sources.
- A plan showing the location of new and existing noise sources, noise sensitive premises and any survey measurement locations.
- A survey of the background (LA90,T) ambient noise (LAeq,T), and 1/3rd octave band spectrum levels to determine the existing noise level in the area and at any nearby properties likely to be affected by the noise. It is expected that the monitoring will be conducted over at least a 7 day period.
- A prediction of noise levels arising from the proposed development at noise sensitive properties. It is expected that all predictions will be based on a worst case scenario.
- If appropriate, a prediction of the cumulative noise level from the proposed development and the existing Balblair substation at neighbouring noise sensitive properties levels.
- A comparison of the predicted Rating level for noise arising from the development (and any

cumulative effect of the existing substation) with the background level in accordance with BS4142:2014+A1:2019: Methods for rating and assessing industrial and commercial sound to demonstrate.

- A description of any noise mitigation methods that will be employed. The effect of mitigation methods on the predicted levels should be reported, where appropriate. Details of the mitigation measure should also the detailed specifications of any barriers, enclosures etc.
- The outcome of the noise assessment must clearly demonstrate noise arising from proposed development (including any accumulative effect from existing noise sources) will not have any adverse impact on existing noise sensitive properties and will meet the following criteria:

  1. Noise arising from within the operational land of the sub-station, hereby permitted, when measured and/or calculated as an **Leq, 5min, in the 100Hz one third octave frequency band must not exceed 30 dB,** at noise sensitive premises; and

  2. The Rating Level of noise arising from the use of plant, machinery or equipment installed or operated within the operational land of the development **must not exceed the current background noise levels** at noise sensitive premises*

In determining suitable mitigation measures and the design of the proposed new sub-station and HDVC convertor station, consideration should be given to the likelihood of future development at the site. It would be important that any future expansion of the site in terms of permitted development does not result in increased noise levels.

It is also expected that the noise assessment will include an assessment of both the proposed new substation/ HDVC convertor station and any modifications/alterations to the existing Balblair substation.

Should the applicant wish to clarify any of the above matters further or wish to discuss in more detail the operational noise assessment criteria, then please contact the Environmental Health Service directly.

Finally, whilst not specifically included as part of this application, the wider project includes the installation of OHL lines both from Spittal and to Peterhead. The installation of 400 kV line requires significant construction works and will also require a construction noise management. Furthermore, an operational noise assessment for the OHL will require to be submitted in accordance with National Grid Technical Guidance Note TGN(E)322 (2021) operational audible noise assessment process for overhead lines.

**Noise Impacts – Operational**

Furthermore, the site at Fanellan (option 7) is located less than 200 metres away from residential properties. The site is a rural location, and it is anticipated that it will have a low existing ambient noise level. The noise emissions from substations are known to be tonal and are incongruous to the existing rural noise environment. The substation noise would contrast with the natural ambient sounds which would normally occur in this location. Such that even at low levels the noise from the proposed substation could adversely impact on local residents.

It is, therefore, critical that noise mitigation measures are incorporated into the design of the new substation and are considered as a key element of the development. The design of noise mitigation measures must also take into account any future expansions of the development even if these will be undertaken as permitted development.

**Construction Impacts**

Planning conditions are not usually used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. However, as proposed development will include significant construction works over several years and will be undertaken in close proximity to noise sensitive properties, there is potential for significant disturbance from construction noise.

Whilst it is appreciated that SSEN already have a community liaison group in place, given the size and nature of the construction of this project, is it essential that the community liaison group is maintained throughout the duration of the project. The community liaison group should keep residents informed of the progress of the project and allow for complaints to be addressed fairly and expeditiously.

The applicant will also need to submit a construction noise assessment. The assessment should be carried

out by a competent person, in accordance with BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open sites - Part 1: Noise".

It should include: -

1) A description of construction activities with reference to noise generating plant and equipment.
2) A detailed plan showing the location of noise sources, noise sensitive premises and any survey measurement locations.
3) A description of any noise mitigation methods that will be employed and the predicted effect of said methods on noise levels. Mitigation measures must include detail of the construction working hours.
4) A prediction of noise levels resultant at the curtilage of noise sensitive receptors.
5) An assessment of the predicted noise levels in comparison with relevant standards.

It is also expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. Attention should be given to construction traffic and the use of tonal reversing alarms.

As the proposed development is in close proximity to houses, the applicant will require to submit a scheme for the suppression of dust during construction works including from traffic movements.

**Private Water Supplies**
The applicant will require to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption.

**Transport and Wider Access**

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

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

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

**Construction Traffic Management Plan (CTMP)**
Any submission should include a Framework Construction Traffic Management Plan (CTMP) that sets out the management measures that will be implemented to assist with safely managing the routing of

construction-related traffic to and from the finalised development site and help to limit impacts on the public road network. Such management measures will be in addition to any physical improvements deemed necessary. The Framework CTMP should clarify the proposed routing of construction traffic and set out what steps will be taken to ensure all construction traffic adheres to that routing.

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

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

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

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

Similarly, The Council will not accept construction traffic parking on local public roads during the works. Again, suitable facilities should be provided for all construction traffic to park off the road.

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

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

All works on the public local road network will require the approval of the Council as Roads Authority through a Road Construction Consent together with any necessary Technical Approval for structures. Therefore, detailed and dimensioned plans showing the mitigation proposals on and adjacent to the public road will be required to be agreed prior to any works commencing on site.

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

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

The accesses should also demonstrate that adequate visibility can be achieved in both directions along the public roads impacted. For all permanent accesses, these should be measured from a 4.5m setback behind the edge of the existing surfaced carriageway of the public road. In most situations, a 2.4m setback should

be sufficient for temporary accesses. However, this will be dependent on the nature of the road they connect with and the traffic using them, plus the intended purpose and duration of those proposed temporary accesses. For example, temporary accesses from roads with fast moving traffic that are due to be in-place for a considerable period are likely to benefit from 4.5m visibility splay setbacks.

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

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

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

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

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

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

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

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

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

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

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

It should also be noted that any proposed changes to the trunk road network must be discussed and

approved (via a technical approval process) by the appropriate Area Manager. In addition, we would state that in the event that construction works result in the need for Abnormal Load Deliveries (ALD), Transport Scotland will require to be satisfied that the size of loads proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path. A full Abnormal Loads Assessment report should be provided that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.

**Water Environment**

**Flood Risk**

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

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

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

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

Further advice and SEPA's best practice guidance are available within the water engineering section of SEPA's website. *https://www.sepa.org.uk/regulations/water/engineering/*

Guidance on the design of water crossings can be found in Construction of River Crossings Good Practice Guide. *http://www.sepa.org.uk/media/151036/wat-sg-25.pdf*

**Drainage**

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

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

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

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

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

Refer to the Council's *Flood Risk and Drainage Impact: Supplementary Guidance* for further detailed

requirements.

**Existing or Proposed Groundwater Abstractions**
Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:

- A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.

- If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA is likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.

Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice on the minimum information SEPA requires to be submitted.

**Substation and Converter Station Location Options, SEPA**
SEPA welcomes pre-application engagement, but please be aware that SEPA's advice at this stage is based on emerging proposals and it cannot rule out potential further information requests as the project develops. Similarly, its advice is given without prejudice to our formal planning response, or any decision made on elements of the proposal regulated by SEPA, which may take into account factors not considered at the pre- application or planning stage.

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

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

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

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

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

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

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

**Built and Cultural Heritage**

**Impact on the Historic Environment, Historic Environment Scotland**
We note that from 16 potential sites originally considered the options have now been reduced to 4 sites with an additional quarry site recently also considered. There are a number of designated historic environment assets within our remit in the vicinity of the substation Site Options.

• Kiltarlity Parish Church (SM5570)
• Corff House, fort SW of (SM3195)
• Culburnie, ring cairn and stone circle (SM2425)
• Belladrum, Chambered Cairns 250m NNE Of Brockie's Lodge (SM2435)
• Dun Mor, fort, Ballindoun (SM2423)
• Phoineas Hill, enclosure 900m ESE of Phoineas House (SM4729)
• Dun Garbhaig, fort, Kilmorack (SM2422)
• Beaufort Castle (GDL00052)
• Beaufort Castle (LB8068)

**Preferred Site Option 7**

At this stage it appears likely that a new substation could potentially be located at this site without raising issues of national interest for our remit. However, this should be confirmed by full assessment once the details of the proposed substation including potential mitigation options, through landscaping, for example are known. We would also note that the cumulative impacts of the proposed option along with the required overhead line infrastructure should be considered when more detailed assessment is undertaken.

Scheduled Monuments

This option is the least likely to have significant impacts on the settings of nearby scheduled monuments. Site 7 as a combined option would see the proposed substation situated on the plateau at Fanellan, a site which is surrounded by native woodland of Ruttle Wood to the northwest and the Fanellan Wood to the east. This woodland and the flat nature of the plateau at Site 7 is likely to screen the majority of the proposed substation in views from Dun Garbhaig, fort, Kilmorack (SM2422) and Kiltarlity Parish Church (SM5570). Woodland may also provide screening cover in views from Dun Mor, fort, Ballindoun (SM2423), Phoineas Hill, enclosure 900m ESE of Phoineas House (SM4729) and Culburnie, ring cairn and stone circle (SM2425). It is unlikely that the proposed development at the Site 7 location would be visible from Corff House, fort SW of (SM3195) due to the intervening quarry and forestry south of Beauly.

The supplied Options Appraisal also notes that there is a possibility to partially reduce the height of buildings in the proposed substation by sinking them into the plateau of Site 7 at Fanellan, which may further reduce any impacts on the settings of these adjacent scheduled monuments. Further mitigation, particularly of connecting OHLs in this area, should also be considered including the possibility of buried cables and connections in sensitive areas to reduce setting impact upon assets within our remit.

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

Inventory Gardens & Designed Landscapes and category A listed buildings

Site 7 is located west of the Beaufort Castle Inventory Garden and Designed Landscape (GDL00052) some 1.9km to the west of Beaufort Castle (LB8068). The substation may be visible from the Castle and parkland which forms the core of the designed landscape around the Castle, however, much of the perimeter of the estate is enclosed by mature estate woodland, which may limit any visibility. Although there is potential for impacts on both the setting of the Castle and its designed landscape, we think they are unlikely to raise issues of national interest.

It may be possible to reduce any significant impacts by design, for example, reducing heights of towers if possible, micro-siting tower locations or undergrounding cables.

**Other site options**

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

Sites 9, 11 and 11a sit in open plains to the south, southeast and east of Beauly and would be clearly visible, albeit at a low level, from nearby scheduled monuments around Beauly, in particular Corff House, fort SW of (SM3195), Dun Mor, fort, Ballindoun (SM2423) and Phoineas Hill, enclosure 900m ESE of Phoineas House (SM4729). The proposed development in these locations would dislocate the scheduled monuments from their relationship to the land around the river Beauly. While we have not considered these

options in depth, given the level of information currently available, **it is likely that all of these substation options and in particular any connecting OHLs would have significant adverse impacts on the setting of these scheduled monuments.**

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

Quarry A would be situated as an extension of the existing Balblair Wood quarry to the immediate north of the River Beauly. While the principle of quarrying is established in this location, any extension of the Balblair Wood quarry site which might be required would bring development closer to the scheduled area across the river at Kiltarlity Parish Church (SM5570), potentially within 300m of the scheduled area.

Views from Kiltarlity Parish Church (SM5570) to the north are currently screened from the existing quarry by a shelterbelt of trees on the immediate north bank of the River Beauly, and the proposals for the establishment of the Quarry A site would retain a small shelterbelt. Should this option be taken forward we support the retention of this shelterbelt which provides an important function in screening and focussing the sight line north from the scheduled area to local views of the river and its banks. Should the current tree screening be removed to open up this view to the quarry and HVDC site it would have a significant impact upon the setting of the scheduled monument, such that it would likely raise issues of national interest and we would have to object, as operations within 300m of the scheduled area would serve as both a distraction to setting of the monument, its character and sense of place, and its relationship with the river which all form key aspects of its setting.

**Provided this screening can be delivered/ensured we would be content that Quarry A would not result in significant impacts on the monument's setting.** We would welcome further consultation on this aspect of the proposals as they develop due to the sensitivities around this monument should this option be taken forward.

We would also note that currently the assessment for the site at Quarry A appears to have only considered the category B listed building at Kiltarlity (LB8081) and does not appear to have considered the scheduled monument identified above.

**Cumulative Impacts**
In addition to the potential impacts from the combined substation and converter station or the individual station sites, it will be vital to consider the potential cumulative impacts from the associated overhead lines due to connect into the sites.

Our response to the route options for the new 400 kV overhead line between Spittal and Beauly is provided separately but we would note here that **all of the proposed route options to all of the Beauly substation options potentially raise concerns over significant adverse impacts to the setting of designated assets**.

This includes assets to the north on the Beauly to Loch Buidhe section of the OHL route which passes in close proximity to a cluster of likely Iron Age forts including Dun Fhamhair (SM5212), Dun a Chliabhain (SM2424), Dun a Garbhlaich (SM2422) and Dun Mor (SM4979) to the northwest of Beauly, and with the proposed Beauly-Blackhillock- New Deer-Peterhead OHL route which passes in close proximity to another cluster of likely Iron Age forts including Dun Mor, fort, Ballindoun (SM2423), Phoineas Hill, enclosure 900m ESE of Phoineas House (SM4729) and Castle Spynie, broch (SM4653) to the southeast of Beauly. **The Beauly-Blackhillock-New Deer-Peterhead also has the potential to impact on the setting of the Beaufort Castle GDL and associated listed buildings**.

**Summary**
At this stage and based on the information provided so far, we consider it likely that a substation could be accommodated at the preferred option combined Site 7 without raising issues of national interest for our remit. It will also be important to assess the cumulative impacts of the associated overhead lines, underground cable routes and other proposed substations in the vicinity which require to connect into the

substation.

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

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

**Impact on the Historic Environment, The Highland Council**
The Historic Environment Team have not provided any specific comment on any of the pre-application proposals and are expected to engage at the EIA Scoping stage.

**Developer Contributions**

The Council's Developer Contributions Supplementary Guidance will be used in the determination of planning applications and requires all development, including single house developments, make proportionate financial developer contributions towards meeting service and infrastructure needs in areas of Highland where clear deficiencies are identified. For the proposed development, the anticipated developer contribution requirements are outlined below. Please note that requirements can change over time and the exact amount payable will be confirmed at the point that a planning application is determined.

Please note that under the terms of HwLDP Policy 31 Developer Contributions and the Council's Developer Contributions Supplementary Guidance (2018), industrial (including energy) developments may be required to make contributions towards: transport; green infrastructure; water and waste; public art.

www.highland.gov.uk/developercontributions

**Pre-Application Procedures**

**Proposal of Application Notice**
The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008 require that for any major development pre-application consultation must be undertaken. This requires a formal Proposal of Application Notice to be submitted to the Planning Authority at least 12 weeks prior to any formal planning application being lodged and any subsequent planning application must be accompanied by a Pre-application Community Consultation report. Further information is provided on the Council website, please see the Proposal of Application Notice section here

**Public Consultation**
Public consultation should be undertaken as the proposals develop to help both gauging the opinion of the local community and also scoping potential areas of conflict which could be addressed prior to submission of the application. When carrying out community consultation we recommend that full consideration is taken of Scottish Government Planning Advice Note 3/2010 - Community Engagement. This includes the standards for community involvement which should be adhered to.

It is advisable to take into consideration all of the comments made by members of the public before a planning application is submitted to ensure that the public feel they have had an influence over the proposals. For public consultation it may be useful to use the SP=EED tool developed by Planning Aid Scotland. This builds on the Standards for Community Engagement set out in PAN 3/2010. This is available online at https://www.pas.org.uk/.

**Community Councils**
In terms of the appropriate Community Councils to consult, the proposal is located within the *Kilmorack Community Council* area. A development of the nature proposed may affect a number of adjacent Community Councils, as such it is recommended that adjacent Community Councils are also consulted. The Ward Manager *Charles Stephen* can provide advice further in this regard if required. Contact details for all community Councils can be found here.

## Application Procedures

**Processing Agreements**

A processing agreement is a way of helping developers, the Council and relevant stakeholders work together through the planning process. It involves setting out the key stages involved in deciding a planning application, identifying what information is required from whom and setting time scales for the various stages of the process.

The Council actively encourages the use of processing agreements for major applications. You are advised to contact the Council's Major Application Team with a view to agreeing a Processing Agreement at the earliest possible opportunity. Contact details are provided towards the end of this pack.

**Councillors Code of Conduct**

It would be beneficial for you to be familiar with the Councillors' Code of Conduct. This is available online at the Standards Commission for Scotland website.

**Scheme of Delegation**

All applications will be determined in line with the Council's Scheme of Delegation. It would be beneficial for you to familiarise yourself with the scheme. This is available online.

## Any Other Appropriate Information

**Gaelic**

In line with the Council's ongoing commitment to promote the increased use of Gaelic in developments within the Highlands, you are encouraged to consider the use of bilingual signs - both internal and external - as part of your proposal. Our Gaelic Translation Officers are able to provide additional advice and help with translations, if required.

For further information and guidance, please contact gaelic@highland.gov.uk

To download a copy of the Council's 'Using Gaelic in Signs' advice note, please visit: https://www.highland.gov.uk/downloads/file/11857/guidelines_on_the_use_of_gaelic_in_highland_council_services

For details on grant funding for bilingual signage, please contact Comunn na Gàidhlig on (01463) 724287 or visit www.cnag.org.

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**Disclaimer**

This advice is based on the information submitted and is given without prejudice to the future consideration of and decision on any application received by The Highland Council.

Pre-application case files are not publicly available but can be the subject of Freedom of Information and Environmental Information Regulations requests.

**Useful Weblinks**

*The Highland Council Development Plans*

https://www.highland.gov.uk/info/178/local_and_statutory_development_plans

*Highland Council Supplementary and Development Guidance Listed by Category:*

https://www.highland.gov.uk/directory/52/development_guidance

*Siting and Design Quality:*

THC Sustainable Design Guide
https://www.highland.gov.uk/directory_record/683409/sustainable_design

*Roads/Access and Transport*

More information on access and parking standards (incl. small housing developments) can be found at:
https://www.highland.gov.uk/info/20005/roads_and_pavements/101/permits_for_working_on_public_roads/4

*Access Panel*

The Council encourages applicants at pre-application stage to engage with the local Disability Access Panel to consider accessibility improvements for physically disabled and sensory impaired people. The Highland Council have published a Planning Protocol for Effective Engagement with Access Panels, which you should take into consideration

Access Panels Contact Info-
https://www.highland.gov.uk/info/751/equality_diversity_and_citizenship/326/equality_and_diversity_contacts/4

*Scottish Government*

Scottish Government Building, Planning and Design Pages
https://www.gov.scot/building-planning-and-design/

Scottish Government Planning and Architecture Guidance
https://www.gov.scot/policies/planning-architecture/planning-guidance/

Scottish Planning Policy
https://www.gov.scot/publications/scottish-planning-policy/

*Scottish Water*

Contact Scottish Water for guidance on connections to the public water/drainage network:
https://www.scottishwater.co.uk/en/Business-and-Developers/Connecting-to-Our-Network/Pre-Development-Information/Planning-Your-Development

*SEPA*

You can find more information on SUDS at: https://www.sepa.org.uk/regulations/water/diffuse-pollution/diffuse-pollution-in-the-urban-environment/

You can view SEPA's small-scale developments guidance here:

https://www.sepa.org.uk/regulations/water/small-scale-sewage-discharges/

You can view SEPA's flood risk map here: https://www.sepa.org.uk/environment/water/flooding/flood-maps/

CAR Licensing - https://www.sepa.org.uk/media/34761/car_a_practical_guide.pdf

*Historic Environment*

The Highland Historic Environment Record (HER) contains detailed information about listed buildings, conservation areas and archaeological sites in the Highland area:
http://her.highland.gov.uk

General advice on development affecting historic designations can be found at:
https://www.historicenvironment.scot/advice-and-support/

*Protected Species -SNH*

More information on Scotland's protected species and areas can be found at:
https://www.nature.scot/professional-advice/safeguarding-protected-areas-and-species/protected-species

https://www.nature.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers/planning-and-development-protected-areas

*Trees and Woodland*

The Scottish Government's woodland strategy and associated polices can be found here:
https://forestry.gov.scot/support-regulations/control-of-woodland-removal

The Council's guidance on tree/woodland issues can be found here:
http://www.highland.gov.uk/info/1225/countryside_farming_and_wildlife/63/trees_and_forestry/