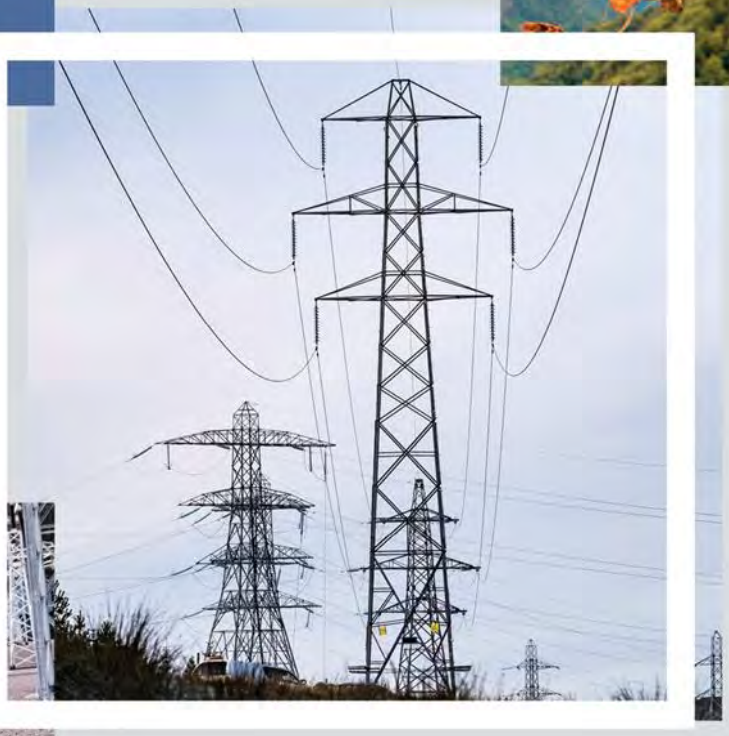
Report on consultation

Kintore to Tealing 400kV Overhead Line

August 2024



Scottish & Southern Electricity Networks

TRANSMISSION

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1. Introduction

1.1. Purpose of this document

The purpose of this Report on Consultation (RoC) is to document the proposed Kintore to Tealing 400 kV Overhead Line (OHL) route selection consultation process, and where appropriate, show how the routes that are being taken forward to the next stage of project development have been informed by this process. Please note:

- The first public consultation event for the OHL covered both Corridor and Route Options between Kintore and Tealing and was held from May to July 2023. The RoC for that consultation can be found here: Kintore to Tealing OHL RoC November 2023.
- This RoC relates to the second round of public consultation held from March to April 2024 which sought feedback on New Route Options proposed for parts of Sections D, E and F, see Route Consultation Document (see also **Figure 1.1** below for details of Route Sections).
- This RoC also discusses general feedback received on the Refined Routes[1] that were presented at the March to April 2024 consultation and which provided updates to project development (refer to **Section 1.3** and **Figure 1.2** below and see the Refined Routes maps here: Refined Route Maps Combined March 2024).

This RoC details the consultation undertaken, including details of consultation methods and advertising, those consulted and/or contributing to the process and it summarises the feedback received, including concerns and areas of support. This RoC confirms which Route Options are being progressed to the next stage of development and provides information on the next steps we will be implementing leading to the next round of public consultation events.

1.2. Project overview

Based on the requirements outlined in the National Grid Electricity System Operator's (NGESO) Pathway to 2030 Holistic Network Design, we have developed proposals to reinforce the transmission system by the construction of a new 400 kV OHL between Kintore and Tealing. This would also require two new 400 kV substations to be constructed, one at Fetteresso Forest, known as Hurlie, and one north of Dundee near Tealing, known as Emmock, to enable future connections and export routes to areas of demand. These substation proposals are being progressed as separate projects.

New SSEN Transmission projects between Kintore and Tealing

The project specific webpages for RoCs and Pre-Application Consultation (PAC) documents regarding the proposed Emmock and Hurlie substations can be found at the following links:

- Emmock Substation: ssen-transmission.co.uk/emmock
- Hurlie Substation: ssen-transmission.co.uk/hurlie

[1] Refined Routes were presented in the consultation to provide an update on work in progress within some parts of the Proposed Routes (see Section 1.3).

1.3. What we were consulting on

We understand the importance of involving communities and key stakeholders throughout each stage of our development process. Stakeholder feedback collected during consultations is critical to ensuring that our decision making is informed, and stakeholder concerns are taken into consideration at each stage of the project's development.

A combined Corridor and Route consultation for the OHL was previously undertaken from May to July 2023, following which, a decision was made by SSEN Transmission to revisit and extend the substation site selection exercise, with a view to seeking alternative substation site options to those previously presented for the original proposal at Fiddes. Following detailed assessment of environmental, technical, and cost factors, a new location for the preferred substation site was selected within Fetteresso Forest, approximately 7km west of Stonehaven, in Aberdeenshire. That site is now known as Hurlie Substation.

The change in preferred substation site necessitated a revised OHL routeing exercise to be implemented in Section D and in part of Section E of the Proposed Corridor. Four new OHL routes were identified to provide options for the connection of the proposed Kintore to Tealing 400 kV OHL with the new substation at Hurlie, namely New Route Options D4, D5, E2 and E3.

A New Route Option, F1.3, was also introduced following feedback received during the May to July 2023 consultation and following further collection and analysis of environmental data.

In summary, the New Route Options presented in the March to April 2024 consultation were:

- Section D - **New Route Options D4 and D5** which extend from Route C1 to connect into the proposed Hurlie 400 kV substation. Route D4 was the Preferred Route[2] on balance across the range of environmental and technical constraints.
- Section E - **New Route Options E2 and E3** which exit the proposed Hurlie 400 kV substation heading north to connect into the northern section of the Proposed Route, E1. Route E2 was the Preferred[3] Route on balance across the range of environmental and technical constraints.
- Section F - **New Route Option F1.3** extends to join Route F2. Route F2 was presented during the May to July 2023 consultation but is now proposed over Route F1 in the northern part of Section F. Route F1.3 is a New Route Option for Section F which has been identified following previous consultation feedback and route constraints and options appraisal reviews. This new route will combine elements of the previously Preferred Route F1 with parts of Route F2 to provide a continuous route through Section F. Route F1.3 is the Preferred[4] Option in Section F which is considered on balance to have less overall environmental and technical constraint than the options previously appraised in this section.

Additionally, the consultation set out the Proposed Routes to be taken forward to alignment by SSEN Transmission in Sections A, B, C and part of E and F. These had been subject to consultation previously and were set out in the November 2023 RoC:

- **Route A1** - This is the previously Preferred Route Option for Section A with no proposed changes.
- **Route B1.1** - This is a new Preferred Route for Section B which has been confirmed following consultation feedback and route appraisal reviews.
- **Route C1** - This is the previously Preferred Route Option for Section C with no proposed changes.

[2] The 'Preferred Route' refers to the option which we believe offers an appropriate balance of technical and environmental impact considerations identified through initial assessment. This is then subject to consultation with stakeholders, where local and previously unknown considerations may confirm or alter the initial preference.
[3] See 'Preferred Route' definition above.
[4] See 'Preferred Route' definition above.

- **Route E1** - This is a revised route option for Section E which includes only the northern section of the previously Preferred Route E1.
- **Route F2** - This is the previously Preferred Route Option for the northern section of Section F.

These Route Options are shown in **Figure 1.1** below (see also **Appendix C**). Details of the environmental, technical, and cost appraisals for the New Route Options were outlined in the consultation materials, and stakeholder feedback was sought on these.

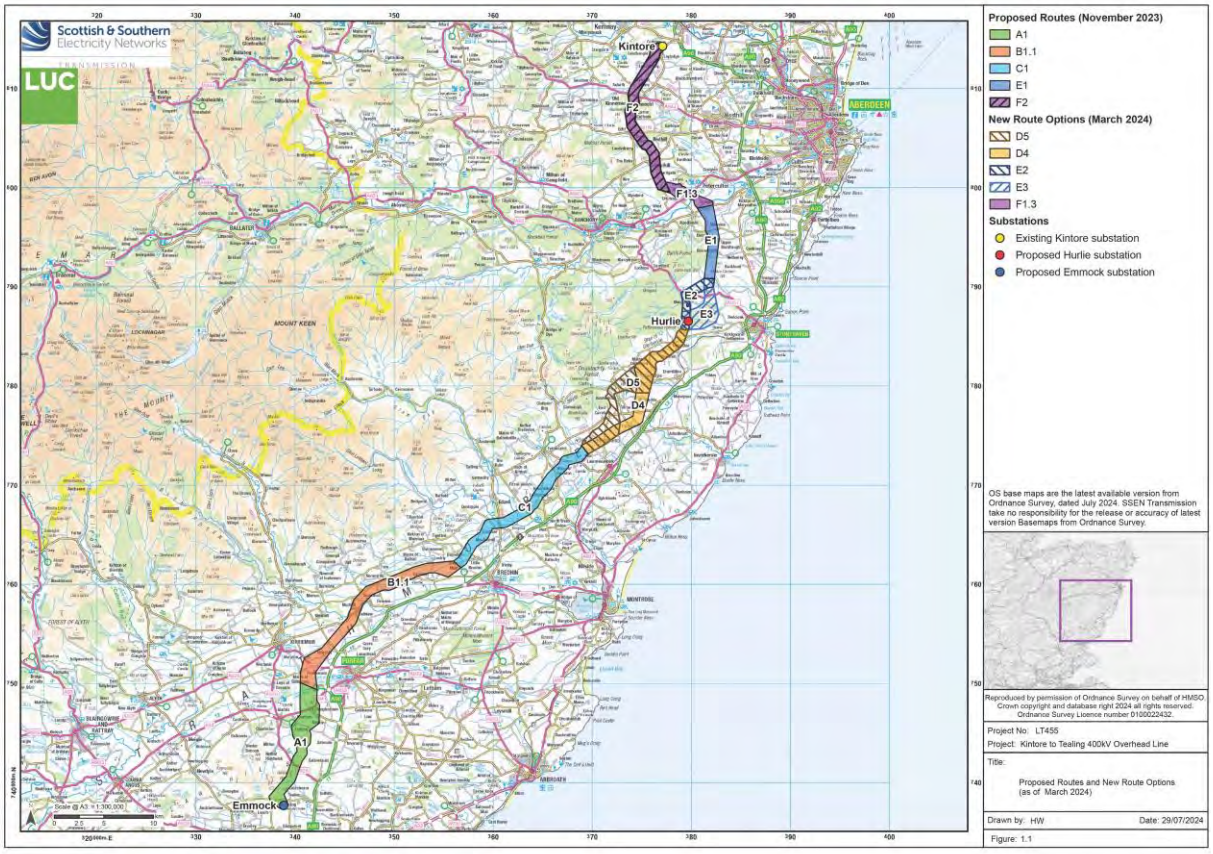


Figure 1.1: Proposed Routes and New Route Options (as of March 2024)

The Route Consultation Document provides the rationale for the Preferred Route Options in Sections D, E and F and sets out the Proposed Route (from the November 2023 RoC) in Sections A, B, C and part of E and F, and can be found here: Route Consultation Document.

Following the identification of Proposed Routes in some sections of the project, as described in the November 2023 RoC, we continued with our project development which involved a narrowing of the Proposed Route widths. They are referred to as 'Refined Routes' and are approximately 500 m wide, within which we aim to identify an optimal alignment for the OHL. These Refined Routes were also presented at the March to April 2024 consultation to provide an update on our work to date, see **Figure 1.2** below (see also **Appendix C**). It was highlighted during the consultation period that these were still subject to change as design and assessment work progresses (see: March 2024 OHL Update Pamphlet). Stakeholders were advised that they could provide feedback regarding the Refined Routes whilst we work to identify our alignments, or to highlight any comments or questions regarding the changes made in Sections B, D, E and F.

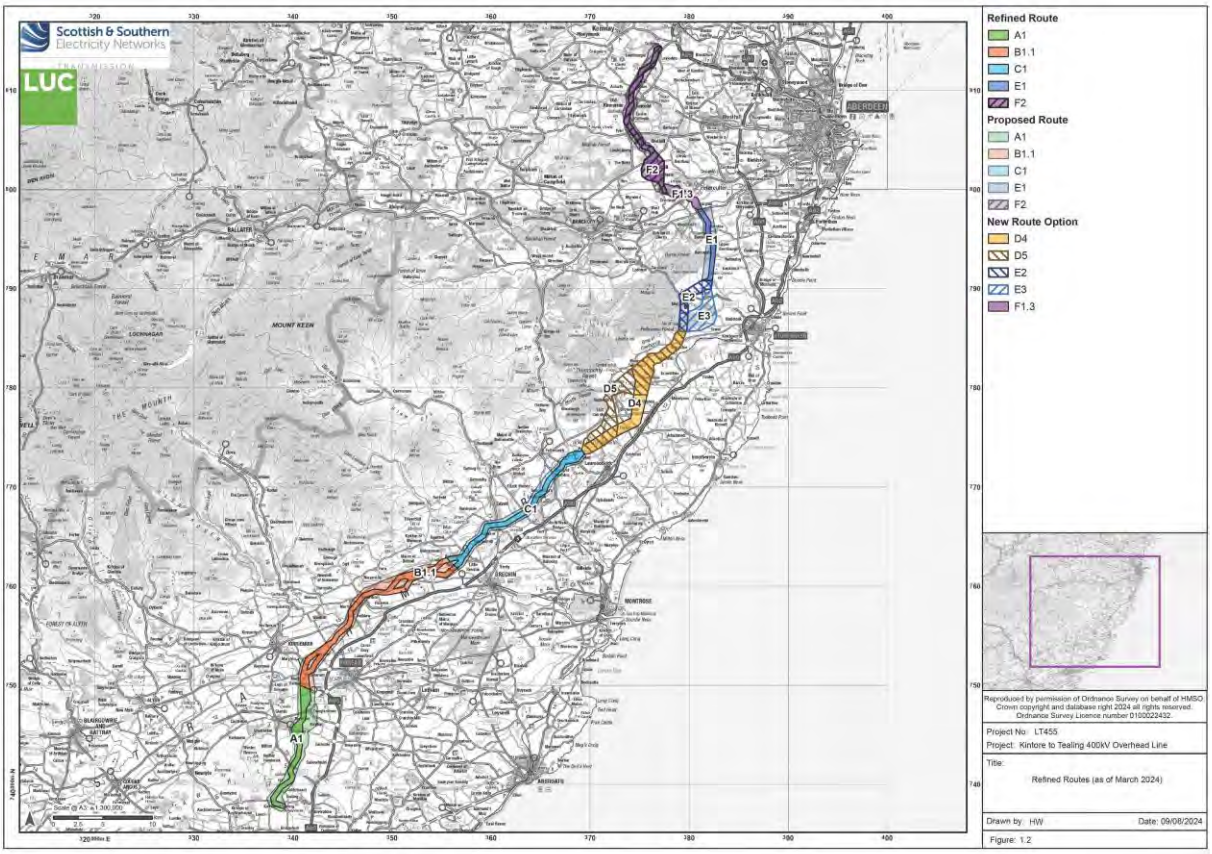


Figure 1.2: Refined Routes (as of March 2024)

1.4. Project timeline

The project timeline is set out below and may change as the project continues to develop.

Find out more about our 2030 projects here: www.ssen-transmission.co.uk/projects/2030-projects/.

2. The Consultation Process

2.1. Who we consulted with

Our consultation process sought to capture the views of anyone who had an interest in our proposals, and we invited comments from all. During our engagements we aimed to ensure that we captured the views of:

- statutory consultees;
- non-statutory consultees;
- residents, homeowners, community members and local organisations, including local elected members; and
- landowners and occupiers.

2.2. Consultation feedback period

The consultation period was open from 20 February 2024 and closed on 30 April 2024.

Statutory consultees were invited to provide feedback on the new route consultation document (please see Consultation Document links provided in **Section 1.3** above). Where possible, affected landowners were contacted ahead of the consultation period to discuss land related considerations or concerns.

2.3. The advertising process

The consultation events were advertised extensively using the following methods:

- The Angus County Press, The Courier and The Press and Journal.
- Our social media channels and the dedicated project webpage.
- Community Councillors and Local Elected Members were emailed in advance with information and a poster they could share within their local area.
- A mail drop consisting of a letter and a postcard insert was sent to 188,557 homes and businesses within communities potentially impacted by our proposals.

Please see **Appendix A** for an example of the advertisement.

2.4. Stakeholder participation

A series of in-person consultation events were held between 5 March and 21 March 2024, where local stakeholders could meet with the project team to discuss the proposals in more detail. The events are outlined in **Table 2.1** below.

Table 2.1 List of in-person consultation events

Date	Event	Recorded attendance
5 March 2024	Memus – Memus Community Hall	142
6 March 2024	Forfar – Reid Hall	201
7 March 2024	Tealing – Tealing Village Hall	135
11 March 2024	Stonehaven – Bowling Club	175
12 March 2024	Brechin – Brechin City Hall	213
13 March 2024	Echt– Echt Hall	264
14 March 2024	Laurencekirk – Dickson Memorial Hall	200
19 March 2024	Drumlithie – Drumlithie Village Hall	118
20 March 2024	Drumoak – Drumoak Bowling Club	357
21 March 2024	Auchenblae – Auchenblae Village Hall	107

Attendance figures reflect the number of people who had registered their attendance at a consultation event. For busier events, the number of attendees can often be considerably higher than recorded. For members of the public who were unable to attend the face-to-face consultation events, a virtual exhibition room was made available on the dedicated project website that contained all the project documentation.

Stakeholder Meetings

In the weeks before, during, and after the consultation events, various meetings were held with other key stakeholders such as statutory and non-statutory consultees, councillors, and community councils to discuss the project proposals, the list of meetings are outlined in **Table 2.2** below.

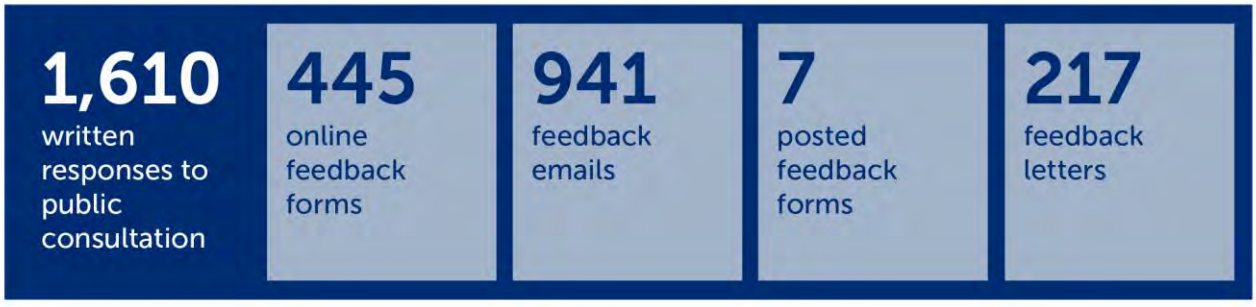
Table 2.2 List of stakeholder meetings

Date	Meeting Type	Stakeholder group in attendance
19 January 2024	Meeting	Andrew Bowie Member of Parliament (MP).
23 January 2024	Community Council requested public meeting	Crathes, Drumoak and Durris Community Council and community members.
15 February 2024	Community Council requested in person public meeting	Crathes, Drumoak and Durris Community Council and community members.
22 February 2024	Statutory consultee online meeting	Local Authorities, SEPA, NatureScot, HES and Scottish Forestry.
29 February 2024	Pre-consultation Webinar for Community Councils	Local Community Councils, 17 attendees over 7 Community Councils.
3 April 2024	Call with Project Manager	Grampian Forest Rally.
27 April 2024	Meeting	Infrastructure Services Committee Chair and Vice Chair, and representatives from Aberdeenshire Council planning team.
28 April 2024	Meeting	Members of the Kincardine & Mearns Area Committee.

2.5. Feedback volume

Feedback from our stakeholders was welcomed via a range of methods. For the public consultation responses in the form of letters, emails, phone calls, the feedback form submitted by post or email, or online, before the feedback period end date, have been included in the analysis undertaken for this RoC. Feedback received after the end date has been responded to and considered by the project team but has not formed part of the analysis presented in this RoC.

Responses to Public Consultation



Discussions with landowners regarding the new route options have also started and their feedback has been taken into account. Additionally, feedback provided in person to SSEN Transmission team members at the consultation events was recorded and has also been considered.

Responses from Statutory and Non-statutory Consultees

A total of 31 statutory organisations (including Community Councils) were contacted by us and asked to provide feedback on the proposals. A total of 13 statutory organisations responded, with a summary of their feedback discussed in **Section 3.3** below and the full responses set out in **Appendix B, Table B.1.**

A total of 32 non-statutory organisations were contacted by us and asked to provide feedback on the proposals. A total of 8 non-statutory organisations responded, with a summary of key feedback discussed in **Section 3.3** below and the full responses set out in **Appendix B, Table B.2**.

In addition, one Member of the Scottish Parliament (MSP, for the Angus and Mearns constituency), responded. A summary is included in **Section 3.3** below and the full response is set out in **Appendix B, Table B.2.**

Stakeholder Representations

A number of other non-statutory organisations that were not directly approached by us have responded to the consultation through the public consultation channels. Their comments have been taken on board and were analysed along with the public consultation responses. The list of consultees will be reviewed and updated for the next stage of the project.

3. Consultation Feedback and Our Response

3.1. Introduction

Consultation feedback covered a number of common themes (common to SSEN Transmission's Pathway to 2030 projects), as well as project specific themes relevant to the proposed Kintore to Tealing 400 kV OHL, and a number of themes relevant to the specific Kintore to Tealing 400 kV OHL New Route Options and Refined Routes.

Most of the consultation feedback related to the common themes and the proposed Kintore to Tealing 400 kV OHL project; a much smaller number of comments were specific to the New Route Options and Refined Routes.

Responses to the key common themes are provided in **Section 3.2** below, and **Section 3.3** summarises the project specific feedback and the feedback specific to the New Route Options and Refined Routes.

3.2. Common themes

We have developed a set of Frequently Asked Questions (FAQs) as well as 'Pathway to 2030 Projects - Additional Information' which comprises a series of booklets and leaflets to address the common themes being raised at our consultation events. This information can be found here:

- ssen-transmission.co.uk/2030faqs.

The key common themes identified are summarised below.

Project Need

The need for SSEN Transmission's Pathway to 2030 electricity transmission network reinforcements, which form part of a major upgrade of the electricity transmission system across Great Britain (GB), are underpinned by UK and Scottish Government energy policies and associated targets.

The independent GB Electricity System Operator (ESO), National Grid ESO (the ESO) has assessed the need for these projects as required and made recommendations that they proceed, including the proposed technology choice, through its Pathway to 2030 Holistic Network Design[5]. The independent GB energy regulator, Ofgem, has also approved the regulatory need for these projects through its Accelerated Strategic Transmission Investment (ASTI) framework.

The Scottish Government, in its Draft Energy Strategy and Just Transition Plan[6], has set a new target for an additional 20 GW of new low carbon renewable electricity generation by 2030, including 12 GW of new onshore wind. The Scottish Government has also consulted on increasing its current offshore wind target of 11 GW by 2030, with its final Energy Strategy and Just Transition Plan expected in summer 2024.

As well as delivering net zero and renewable targets, there is also a requirement to secure the country's future security of supply and reduce our dependence on volatile and often expensive global wholesale energy markets. In April 2022, the UK Government published its British Energy Security Strategy (BESS)[7]. This set out the UK Government's plans to secure the country's future energy independence by reducing dependence on, and price exposure to, volatile global wholesale gas markets. This will be

[5] A Holistic Network Design for Offshore Wind | ESO (nationalgrideso.com)
[6] Draft Energy Strategy and Just Transition Plan - gov.scot (www.gov.scot)
[7] British energy security strategy - GOV.UK (www.gov.uk)

achieved by accelerating the deployment of homegrown and affordable low carbon electricity generation, together with accelerating the enabling electricity network infrastructure required to connect and transport this power.

SSEN Transmission's responsibility is to develop this critical national infrastructure in line with these UK and Scottish Government targets and strategies as sensitively as possible, in a way which seeks to minimise and mitigate community and environmental impacts and maximise local and national economic opportunities and jobs.

A link is provided below to a paper that has been prepared to provide more information on the need for these projects, including links to the key source documentation and can be accessed via the link below:

- **Why the Pathway to 2030 Projects are needed**

Alternatives and Technology Choice

To successfully deliver the UK Government's ambition of 50 GW of offshore wind by 2030, this will require a combination of both new onshore and new offshore electricity transmission network being consented and delivered within this decade across the country. The need for both onshore and offshore solutions has been firmly established by the National Grid ESO, and SSEN Transmission are committed to working with stakeholders to find the right technology solution for each project which balances technical, operational, environmental and economic factors.

In terms of undergrounding, the use of High Voltage Direct Current (HVDC) systems is a technology that SSEN Transmission have deployed on their network in an offshore capacity to assist with the transfer of electricity over distance: the Caithness-Moray HVDC Link is operational, the Shetland HVDC link is on track for energisation this year, as well as planned links from Spittal-Peterhead, the Western Isles-Beauly in addition to two links leaving Peterhead to connect to National Grid's Transmission area which all form part of the proposed 'Pathway to 2030 Projects'.

In progressing the use of HVDC technology, our current proposed HVDC subsea links have been considered in conjunction with the use of onshore (High Voltage Alternating Current (HVAC)) Overhead Line technology via the assessments and recommendations set out in the Pathway to 2030 Holistic Network Design, run by the ESO to determine the most economic and efficient manner to transport significant volumes of renewable electricity and provide value to the end consumer. This has determined that both HVAC and HVDC technologies are required to achieve the increase in network capacity required for 2030 to support the connection of ScotWind, with these investments also independently assessed and approved by the energy regulator, Ofgem, as part of a single, integrated GB wide strategic network plan.

The selection of HVAC for onshore use in conjunction with offshore HVDC technology has been driven by a number of factors. These include:

- The current capacity of HVDC technology is 2 GW, whereas the equivalent HVAC technology operating at 400 kV is approximately 6 GW, offering close to three times the capacity. Therefore, to achieve the capacity of one 400 kV OHL, three HVDC systems would be required, with their substantial Convertor Stations required at either end of the system needed.
- The use of HVDC to achieve the same capacity would result in more substation infrastructure than HVAC with each system requiring its own Convertor Station (with a footprint of approximately 93000 m^2), that being three at either end, as opposed to the one substation site required for HVAC technology. This would result in more convertor stations with a larger number of buildings to house the equipment. The HVDC technology still requires to be connected to the AC network and so the use

of HVDC does not remove the need for AC substations and could lead to larger substations to enable the three HVDC systems to connect to the AC system. The HVDC converter stations would be required in addition to the current proposed AC substations.

- The current cost of HVDC systems is significantly higher than that of the equivalent HVAC OHL, therefore in addition to having substantially less capacity than HVAC there would be additional cost to the end consumer to install this technology to achieve the same capacity, resulting in higher energy bills.
- The onshore system within our network operates on HVAC with the system being interconnected across the different voltages to allow connections of generators to the system as well as to supply businesses and houses via our connections to the Distribution Network. With a HVDC system, additional Convertor Stations would be required at any point along the routes required to connect the system back to the existing network to either supply the Distribution Network or allow Generators or large Demand users to connect. These drive additional costs to the consumer (again increasing bills) to construct this additional infrastructure to allow connection to the existing HVAC network, as well as requiring additional land take on the routes to construct these and local impacts on where these are located.
- Whilst HVDC underground cable takes up a smaller footprint than equivalent HVAC underground cable when considered on an individual basis, when the number of HVDC cables required for the equivalent capacity, the required widths become similar for the temporary construction works taking up more geographical space. In particular, it may not represent the best solution for landowners due to the greater footprint and associated impact on agricultural land, the same issues with regards to operation and maintenance apply to the use of HVDC underground cables (UGC) as to HVAC. In the event of a fault on our network, it is significantly quicker to locate and repair a fault on an OHL than an UGC, which can take months to locate, identify the issue and conduct the required repair. Given the critical nature of the circuits being progressed it is important that operations can be restored in as short a time as possible to avoid wider issues across the network and ensure security of supply for communities on our network.

Our Pathway to 2030 Projects will progress both HVAC and HVDC projects in line with the assessments and recommendations from the Holistic Network Design, as the Network continues to develop post-2030 we will continue to work with the ESO and wider stakeholders to identify the most suitable technologies to deploy across our network to meet the needs of the Transmission Network.

Links are provided below to papers which have been prepared to explain why we need both onshore and offshore solutions and the difficulties with developing underground 400 kV transmission:

- **Why the Pathway to 2030 projects require both onshore and offshore solutions**
- **The challenges with undergrounding at 400 kV**

Electromagnetic Fields

We develop, build, and operate our infrastructure to meet all health and safety legislation and guidance set by relevant bodies including the UK Government, Scottish Government, the Health and Safety Executive (HSE) and our regulator, Ofgem – including that associated with Electric and Magnetic Fields (EMF). In respect of EMFs, we strictly follow the guidance as set by the UK Government, which in turn is informed by international guidance.

As well as setting exposure limits that protect against known established effects of EMF, the UK Government's guidance also includes precautionary measures to protect against possible effects below the exposure limits that have not been established by science. In addition to this, the UK Health Security Agency and Department of Health have a remit to review new research in this area and ensure that current guidelines and policies are reflective of that research.

With regard to the emergence of new research that has come to light after the UK Government's guidance was published, there is a process in place to ensure this is considered and that the Government policies in place are appropriate in light of any new research. Furthermore, the UK Government's latest policy on EMF is set out in National Policy Statement EN-5, (NPS EN-5)[8] which was reissued in November 2023 and came into force on 17 January 2024. This latest policy is reflective of that review process and in line with the NPS EN-5. The current UK Government guidance, informed by relevant international guidance, is therefore still considered appropriate by the UK Government and their public health experts. Whilst electricity consenting decisions are devolved to Scottish Ministers and the NPS EN-5 is therefore not all relevant in Scotland, we can confirm compliance with all EMF guidance as set out in the NPS EN-5.

There have been over four decades of research looking into whether EMF can cause health effects and there are no established effects below the exposure limits. When we design our OHL, substations, and cables, we do so to ensure they will not exceed those exposure limits, even when operating at 100% capacity. We also ensure that precautionary measures are also applied to the design where required. We will provide information on compliance as part of the consenting process, which will be publicly available.

The guidance we follow, which remains subject to ongoing review as required, ensures that safety measures will be applied to our 400 kV OHL infrastructure protecting us all against EMF exposure, keeping our network safe for the public.

A link is provided below to a leaflet that has been prepared to explain the effects of EMF and the separation distances we apply:

- **EMF Leaflet**

Option Selection Methodology

Our approach to routeing overhead lines is to seek to minimise the impacts of new infrastructure on both the environment (including a range of natural and cultural heritage features) and on communities who live, work and spend time in these areas. We seek to find the best balance between the range of constraints considered whilst also ensuring the proposal is technically feasible, economically viable and capable of achieving consent.

We follow internal guidance on route development and guidance, informed by the Holford Rules, to enable us to consistently and rigorously select routes and alignments. The optioneering process has a number of key stages, with an increasing focus on detail as development activities progress. As well as technical and environmental appraisals, consultation is also undertaken with the public, landowners, consenting authorities and statutory and other consultees. Feedback from this consultation helps to inform which option achieves the best balance and least overall constraint across environmental (including people and communities), technical and cost considerations. The selected option is then taken forward to the next stage.

During each stage, we undertake a comparative appraisal that seeks to distinguish between options, so that a chosen option can be identified. The appraisal considers which option achieves the best balance across environmental (including people and communities), technical and cost considerations. It may not always be necessary or possible to identify multiple alignment options, however it will be clearly stated how the decision has been reached on balance, with reference to the different considerations.
When undertaking comparative appraisals, environmental (including people and communities), engineering and cost considerations are assigned a Red/Amber/Green (RAG) rating, by specialist

[8] National Policy Statement for electricity networks infrastructure (EN-5) - GOV.UK (www.gov.uk)

technical teams using a range of criteria. The RAG ratings for each topic are used to examine differences between the options being considered. The appraisal compares the wider implications of each option on those topics (both individually and combined) and reaches a reasoned conclusion, on balance across all topics.

Links are provided below to papers that have been prepared to explain our optioneering process and the stages each project goes through:

- **Routeing Overhead Lines**
- **How Stakeholder feedback influences our proposals**

Socio-economic Impacts

We understand that there are concerns about the potential impact on properties and businesses within the vicinity of our proposed OHL. Our proposals are still under development and are subject to further consultation and design refinement. We will provide a socio-economic report as part of the consent application.

As a regulated business, we are obliged to follow a statutory legal framework under the *Electricity Act 1989* and *Land Compensation Act 1961*. If property owners are entitled to compensation under the legal framework, we will assess any claim on a case-by-case basis under the direction of this legal framework.

Following the UK Government announcement regarding community benefit in November 2023, SSEN Transmission expects over £100 m of wider community benefit funding to be available from our Pathway to 2030 programme to local communities across the north of Scotland. This fund will enable lasting legacies to be delivered across the region, helping communities prosper. As a stakeholder-led business, we will take account of feedback from our stakeholder consultation exercise from 2023[9], and guidance from the UK Government, expected during summer 2024, as well as Ofgem as we work up the details of the fund. Our ambitious investment plans and indications from the Government mean that we expect the value of the community benefit fund to be over £100 m. We will work with communities and partners to maximise the impact that this can have, with funds planned at both regional and local levels.

Applications for SSEN Transmission's initial £10 m community benefit fund will open by 1 September 2024. A first round of funding will see up to £2 m awarded to regional projects towards the end of the year. We will confirm more details on the launch of the local element of the initial fund in due course.

Links are provided below to papers which provide more information on our approach to community benefits and socio-economic impacts:

- **Delivering legacy benefits through Pathway to 2030 Projects**
- **Working with landowners and occupiers**

Cumulative Impacts

The proposals set out do not fall within the requirements of the *Environmental Assessment (Scotland) Act 2005* which implements the Strategic Environmental Assessment (SEA) Directive in Scotland. Public consultation was however undertaken by the Scottish Government on the plans and strategies which outline the need for the upgrades to the infrastructure transmission network (such as the Draft Energy Strategy and National Planning Framework), including SEA.

Following further public consultation on alignment development, the proposed development will be subject to a full Environmental Impact Assessment (EIA). The EIA will consider cumulative impacts of the

[9] community-benefit-fund-consultation-report-09.11.2023.pdf (ssen-transmission.co.uk)

Kintore to Tealing 400 kV OHL along with the proposed Hurlie and Emmock substations and will also consider the potential for cumulative impacts arising in combination with other planned connections, and other planned developments where impacts are anticipated. The scope of these assessments will be agreed with the Energy Consents Unit (ECU) following the submission of an EIA Scoping Report before being included in the EIA Report.

Human Rights

We do not consider that the proposals that we are promoting are in breach of the European Convention on Human Rights (ECHR) provisions. Our proposals are in pursuance of legitimate requirements to ensure energy security and in accordance with licence provisions and extensive consultation is being carried out with all affected stakeholders. Applications for consent which will be accompanied by Environmental Impact Assessment Reports (EIAR) will be submitted to the appropriate determining authority and will be subject to scrutiny and consultation as part of that process.

Consultation Process

SSEN Transmission take the views of stakeholders seriously and we are holding consultations at different stages of project development to ensure all feedback is captured. Feedback was recorded at the March 2024 events and has been reviewed by the relevant specialist project teams, with issues being followed up as required. The consultation material sought to outline the proposals as clearly as possible, with questions included in the main consultation booklet to gather opinions. Respondents were also able to submit responses in their own format using the SSEN Transmission contact details in the booklet, pamphlet and on the project website. The consultation material included a set of additional information leaflets covering those issues which were being raised frequently by stakeholders were available in hard copy and online.

The legislation governing the consenting of OHL projects in Scotland is the *Electricity Act 1989*. Applications for consent to construct and operate new OHLs are made under Section 37 of this Act and are referred to as 'Section 37 Consents'. Applications made under Section 37 of the *Electricity Act 1989* are submitted to the ECU of the Scottish Government for determination by Scottish Ministers. If the proposals meet certain criteria under the *Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017* ('2017 EIA Regulations'), the application may be classed as an Environmental Impact Assessment (EIA) Development. Applications for EIA Developments require an EIAR to be submitted with the application as an unbiased consideration of the potential environmental impacts of the proposals. The Pathway to 2030 OHL projects are EIA Developments as they meet the criteria for Schedule 1 development set out in the 2017 EIA Regulations.

For projects that are EIA Development, the ECU has published Good Practice Guidance for Applications under Section 36 and 37 of the *Electricity Act 1989* (July 2022). This details the voluntary good practice guidance that the ECU encourages developers to undertake in the pre-application stages of consent for EIA Developments. This broadly emulates the mandatory consultation required of National and Major development proposals under the *Town and Country Planning (Scotland) Act 1997*, including an expectation of at least two voluntary public consultation events being held. SSEN Transmission seeks to ensure that wherever possible, everyone has the opportunity to respond to our consultations prior to submission of any Section 37 application. In total, we will have undertaken four rounds of consultation at different stages of project development.

When the Section 37 application is submitted there will be an opportunity to make formal representations via the ECU's online portal, as well as by email and post. These representations are taken into account when the Scottish Ministers make a determination on the proposals.

The links below provide more information on the Section 37 and consultation processes:

- **The Section 37 Process**
- **How Stakeholder feedback influences our proposals**

Other Issues

For tower crossings, where the OHL may have to cross other existing transmission lines, the initial preference is to have the two lines cross over each other in what is called a diamond arrangement. This avoids the use of underground cable which can lead to additional land sterilisation and maintenance requirements. The alternative option is to place a short section of underground cable on the pre-existing circuit between the towers being crossed (which would be smaller towers rated 132 kV or 275 kV). It would then be necessary to establish a cable sealing compound at either end of the undergrounded cable section.

Where pipelines and underground cables require crossings, these are designed to be as close to 90 degree angles as possible whilst also placing towers outwith the assets safeguarded area to minimise any interaction. More information is available via the following link:

- **Tower crossings**

In relation to the protection of Private Water Supplies (PWS), all PWS located within 250 m of the proposed works (where excavations, such as tower foundations, are likely to be greater than 1 m deep) are identified by the project team during the design and environmental assessment of new infrastructure. A risk assessment is then undertaken to identify those PWS that have the potential to be affected by the works. Should the results of this assessment indicate a risk to the PWS source or infrastructure, then mitigation will be developed for inclusion in a site specific PWS Protection Plan that is discussed and agreed with the PWS owner. A report on potential PWS impacts and mitigation would also be included in the environmental assessments which support the application for consent. In a small number of cases there may need to be consideration of plans of an alternative water supply (on a temporary or permanent basis) in the event of an unforeseen problem with the existing supply. During construction, the contractor will be required to comply with and implement the PWS protection plan. More information is available via the following link:

- **Protecting Private Water Supplies**

3.3. Project specific feedback

Introduction

This section summarises the project specific feedback for the proposed Kintore to Tealing 400 kV OHL and sets out our responses to the key points raised.

Some of the feedback included in this section also refers to the **Common Themes** in **Section 3.2** and to the information papers which are available via the links in **Section 3.2.**

The project specific feedback is set out in tables under three themes:

- Community Impact – see **Table 3.2**
- Environmental Impact – see **Table 3.3**
- Economic Impact – see **Table 3.4**

Feedback was also provided by some consultees specifically on the New Route Options and Refined Routes, this is summarised in **Table 3.5**.and **Table 3.6**. Some revisions have been made to the Refined Routes within the areas covered by the route options in Sections A, B, C and F. These refinements reflect the ongoing process of OHL design development in response to increased understanding of technical,

land use and environmental constraints which has been undertaken by SSEN Transmission since the original Refine Route plans presented to stakeholders in March 2024. Key changes to Refined Routes are described where relevant in **Table 3.6**.

The stakeholders have been grouped into the categories outlined in the **Table 3.1** below:

Table 3.1 Stakeholder groups

Stakeholder Group	Examples
Statutory consultees	Local Authorities, Historic Environment Scotland (HES), Scottish Environment Protection Agency (SEPA), NatureScot (NS), Scottish Water, Community Councils
Non-statutory consultees	RSPB, National Trust for Scotland (NTS), Scotways
Community members and local organisations	Local residents and homeowners, local businesses, Residents Associations, elected members
Landowners and occupiers	Landowners, crofters, tenant farmers, occupiers of properties in closest proximity to substations

The full consultation responses from statutory and non-statutory consultees along with the response from the Member of the Scottish Parliament (MSP) for the Angus North and Mearns Constituency, are set out in the tables in **Appendix B** along with our responses to the points they raise.

Project Specific Feedback Tables

The project specific feedback is set out in **Tables 3.2, 3.3** and **3.4** below.

Table 3.2 Community Impact

Summary of Feedback	Contributing Stakeholder Group	Our Response
Landscape and Visual A number of points were raised by statutory consultees, including the community councils, concerning the potential for adverse impacts to landscape character, landscape designations and views. Aberdeenshire and Aberdeen City Council provided details of the assessment work they expected to be completed to support the consenting process including the assessment of the impact of the OHL and towers on the landscape and visual amenity. Aberdeenshire Council also provided details specific to a number of route sections which are set out in **Tables 3.5** and **3.6**. Concerns were raised by Crathes, Drumoak and Durris Community Council relating to the impact of the OHL on landscape character, designations and views. Members of the public raised concerns about the impact of the OHL on the landscape and countryside views, many considered that the proposals would be damaging to the visual amenity of the area and would diminish its natural beauty and scenic value. It was considered that the OHL would negatively affect the beauty of the landscape specifically the Braes of the Mearns designated as a Special Landscape Area (SLA). A number of respondents considered that the OHL would have a significant and unacceptable landscape and visual impact across a very large area of farmland, tourist areas and residential amenity areas. It was considered that the 'extra-large angular pylons' would overwhelm the character and aesthetic of the area and that the	Statutory Consultees Non-statutory consultees Community, organisations & officials Landowners and occupiers	**Landscape and Visual** It is acknowledged that with new transmission infrastructure there will be a change to the landscape setting. As such, consideration of the landscape is undertaken at the outset of the routeing study process. Wherever possible the OHL route options have avoided designated landscape areas, such as the SLA identified in the Aberdeenshire Local Development Plan (LDP), including the Braes of the Mearns SLA. However, the project would pass through the eastern edge of the Dee Valley SLA in route options E and F where the OHL crosses the River Dee. Due to a high number of properties which constrain the route options, it is not feasible to move the OHL further east to avoid the SLA. Where the route crosses the SLA in this location, further detailed consideration of landscape setting will be given to the alignment design, alongside other constraints. The development of the OHL alignment design will carefully consider key elements of landscape setting to integrate the project into the overall landscape to minimise its prominence as far as possible. This will be achieved through avoidance of ridges and the tops of hills, using hills as back drops to reduce skylining where possible, siting towers on lower areas of land, and avoiding the felling of woodland and trees which provide screening and will interrupt views of the project. The conductors will be a minimum height of 9 m above ground. The following ongoing work will be undertaken as the project develops:

Summary of Feedback	Contributing Stakeholder Group	Our Response
OHL would bear a heavy presence on the area and industrialise the landscape. It was also considered by members of the community that the impact of the OHL on individual properties, specific villages and the surrounding landscape had not been adequately assessed. It was noted that a number of Aberdeenshire villages would be significantly affected by the OHL and that the impact was not being given due weight in the assessment work presented by SSEN Transmission. It was felt that the project was not fully described in the information presented and project details were not provided such as construction sites and permanent access tracks, therefore the impacts could not be fully considered. A number of enquiries were made about the minimum height the conductor would be above the ground.		• Landscape and Visual specialists will be involved in the development of the alignment design. They have already undertaken, and will undertake, further appraisals of options which aim to minimise and mitigate landscape and visual concerns. • Viewpoints for detailed photography will be agreed with the relevant local authorities, NatureScot and HES. • An EIA Scoping Report will be issued to the Scottish Government's ECU. The Scoping Report will provide details on how we propose to complete the Landscape and Visual Impact Assessment (LVIA) as part of the EIA. • An EIAR will be prepared once the design has been finalised. This will include a specific chapter for the LVIA and will also consider the potential for wider cumulative impacts when viewed against the backdrop of other existing and planned infrastructure in the area. • The EIAR will be submitted with the Section 37 application to the ECU and will be subject to a separate consultation process.
Roads and Access A number of respondents raised concerns about the ability of local country roads and road verges to cope with the transportation of plant, kit and materials on large vehicles and Heavy Goods Vehicles (HGV). It was considered that the Class B and C roads would not be able to cope with the increase and size of vehicles and would cause ongoing transportation issues to those living and working in the area including famers, businesses, commuters, delivery and emergency vehicles. In particular, impacts would be felt by farmers accessing land, and in areas suffering from potholes and affected by flooding where the roads and verges are already in a poor / fragile condition.	Statutory Consultees Non-statutory consultees Community, organisations & officials Landowners and occupiers	**Roads and Access** It is acknowledged that there will be some impacts from road traffic movements during the construction of the project. Impacts on traffic and transportation will be assessed as part of the EIA process, and we will do all we can to mitigate and minimise the impacts. Access to OHL tower locations for construction and maintenance will seek to utilise existing roads and access tracks (upgrading where required) as far as practicable to reduce the need for new accesses. For projects of this scale, a Construction Traffic Management Plan (CTMP) will be produced. This will require approval from Transport

Summary of Feedback	Contributing Stakeholder Group	Our Response
		Scotland and local authorities. We will undertake specific liaison with Transport Scotland and Local Authority Roads Departments as the project develops to agree measures for public road improvements, temporary traffic management and other mitigation that may be required. A range of measures can be undertaken to reduce traffic impacts. In local communities these can include avoiding deliveries at peak travel times for local commuting; route planning to avoid schools, shopping areas, community hubs; and implementing public road improvement works (e.g. widening of roads, strengthening of bridges, repairing of road surfaces).
Construction Impacts A number of members of the public considered that not enough information or consideration had been given to the need for temporary areas required during construction for laydown and welfare and that impacts would be more significant and widespread than was being discussed. It was considered that noise, pollution, dust, light, visual and amenity impacts and general day to day disruption for multiple years were being under reported.	Statutory Consultees Non-statutory consultees Community, organisations & officials Landowners and occupiers	**Construction Impacts** The EIA will identify and assess the impacts of temporary areas required for construction and other construction arrangements included within the Section 37 application. Where any temporary works are required that are not included in the Section 37 application, and where consent is to be applied for separately, this will be clearly set out. Our contractors will prepare a Construction Environmental Management Plan (CEMP) prior to commencement of construction. The CEMP will ensure that best practice measures are employed during construction to control noise, dust, and prevent pollution. Within the EIAR, working hours for construction will be proposed. Whilst these have not been discussed in detail at this early stage of the project, working hours would normally be attached as a condition of the deemed planning permission that would accompany the

Summary of Feedback	Contributing Stakeholder Group	Our Response
		Section 37 consent, with any changes requiring local authority approval.
Noise Comments of concern were made about noise (during installation and operation), not only the impact on local residents but also the effects on livestock, wild animals, birds, insects as well as horses and pets.	Community, organisations & officials Landowners and occupiers	**Noise** Noise mitigation is a primary consideration within the design development process. Noise surveys will be undertaken to inform a noise impact assessment which will be reported in the EIAR. These will consider existing noise levels, potential noise impacts from the proposed infrastructure (construction and operation), cumulative noise impacts and any mitigation required to ensure acceptable levels of noise.
Open Space, Recreation and Rights of Way Concerns were noted by Aberdeenshire Council relating to the potential of the project to impact the Core Path Network. Specific areas of concern were at Echt, the Deeside Way, and a proposed path at Dunecht. Aberdeenshire Council also noted concern over the potential to impact access routes through forestry areas. Stonehaven & District Community Council noted concerns over the impact to Hill of Swanley which is used recreationally by the community. Members of the public raised concerns about the impact of the project temporarily and permanently on roads in the area that are popular cycle routes, specific concerns related to the increase in HGVs and the risk this poses to cyclists.	Statutory Consultees Non-statutory consultees Community, organisations & officials Landowners and occupiers	**Open Space, Recreation and Rights of Way** Core Paths, Rights of Way, National Cycle Networks, and areas of open space were considered during the routeing study process and were avoided wherever possible. They will continue to be considered during design development of the alignment. The potential for visual impacts on recreational users will be assessed as part of the EIA. The linear nature of the project and these features mean that it can be difficult to fully avoid crossing these assets. Where the OHL does require crossing of these assets, consideration will be given to project siting such that the amenity value will not be significantly affected wherever possible. During construction, an Access Plan will be implemented to protect footpaths, and diversions will be provided to ensure footpaths remain open for safe use wherever possible. Additionally, the project will be constructed to ensure safe clearances to ensure users can access footpaths that are oversailed by an OHL.

Summary of Feedback	Contributing Stakeholder Group	Our Response
Health and Safety The Angus North and Mearns Constituency MSP highlighted concerns over the potential damage to health, mental health, and wellbeing of those living in close proximity to the OHL. A large number of comments were also made by the community councils (Glamis and Area, and Crathes, Drumoak and Durris) and members of the public about the impact the OHL would have on physical health, mental health and wellbeing with a large number of respondents stating that their questions had not been answered by SSEN Transmission, and evidence had not been presented to allay their concerns. Crathes, Drumoak and Durris Community Council noted that SSEN Transmission had acknowledged that the OHL should not be located closer than 250 m to primary schools and queried why the OHL could be erected significantly closer than 250 m to residential properties. Glamis and Area Community Council noted that they consider that insufficient research has been carried out into the potential effects of OHL on human health, and they referred to SAGE (UK Department of Health's Scientific Advisory Group for Emergencies) advice. SAGE recommended in 2007 that due to the uncertainty around the health effects from OHL that the Precautionary Principle should be applied. Glamis and Area Community Council requested a comparative health analysis of using underground cables in place of OHL when passing close to homes and workplaces.	Statutory Consultees Non-statutory consultees Community, organisations & officials Landowners and occupiers	**Health and Safety** Please refer to the **Common Themes** discussed in **Section 3.2** – **Electromagnetic Fields** for responses regarding EMF from OHLs and associated health concerns. Underground cables do not emit electric fields above ground due to cable insultation however magnetic fields are generally several times higher directly above underground cables than directly below OHLs, depending on current, burial depth, cable design and net current. The following leaflet has been prepared to explain the effects of EMF and the separation distances we apply: • **EMF Leaflet** As part of the routeing process, we aim to maintain as great a distance as possible between OHL, residential properties and other sensitive receptors such as schools. The target distance that we are aiming to achieve across the length of the route as far as possible is 170 m. We are mindful of the uncertainty that our proposals can pose to communities who may be affected. Our process for project development seeks to identify options that provide an appropriate balance across a variety of considerations and interests. We aim to do this as swiftly as possible to minimise the duration of uncertainty for affected communities. However, we are also committed to providing sufficient time and opportunity for all stakeholders to feed into each stage of our project development process, so that views can be understood and wherever possible incorporated into design decisions. This is a balance which has to be carefully managed. We understand that everyone may be impacted in different ways and we

Summary of Feedback	Contributing Stakeholder Group	Our Response
Similarly, Crathes, Drumoak and Durris Community Council suggested that a review of the impacts of EMF should be undertaken given the size of the towers. Members of the public were concerned about the potential impact the high voltage OHL would have on health notably the health of children, and concerns extended to noting that the route goes near settlements and schools. Questions were raised by the public about how SSEN Transmission plans to honour their commitment to having no infrastructure within 170 m of properties when currently it appears that the proposals put the route through lines of houses with 150 m maximum gap between them. A number of respondents described the effect the OHL would have on their health and wellbeing and the negative psychological impact the presence of the OHL would bring causing anxiety, stress and depression. Respondents also noted concerns about safety, with a few citing national security concerns from having high voltage power supply OHL vulnerable to hostile attack.		would be interested in residents' views regarding any additional activities that would help to address their specific concerns
Community Viability Community councils (Crathes, Drumoak and Durris, and Echt and Skene) raised concerns over lack of information relating to compensation and the jobs that the project would create for local communities.	Statutory Consultees Non-statutory consultees	**Community Viability** Please refer to the **Common Themes** discussed in **Section 3.2 - Socio-economic Impacts.** As a regulated business, we are obliged to follow a statutory legal framework under the *Electricity Act 1989* and *Land Compensation Act 1961*. If property owners are entitled to compensation under the legal

Summary of Feedback	Contributing Stakeholder Group	Our Response
The public raised concerns about the OHL and the negative socio-economic impact on local communities. Points were raised indicating the communities' fears that the OHL would have a negative impact on house prices and local businesses and amenity viability, and it would make the area less attractive to residents and less desirable to business owners resulting in a slow decline of the community's population, facilities and services. This concern was also echoed by the community councils (Crathes, Drumoak and Durris, and Echt and Skene).	Community, organisations & officials Landowners and occupiers	framework, we will assess any claim on a case-by-case basis under the direction of this legal framework. We will provide a socio-economic report as part of the Section 37 application. We announced a Community Benefit Fund[10] which is the first of its kind for a transmission operator in Scotland. This will provide a direct opportunity for us to work with local communities that will be affected by the proposal on a variety of local initiatives. These will directly support communities across the North of Scotland will be community led. The following papers provide more information on these aspects: • **Delivering legacy benefits through Pathway to 2030 Projects** • **Working with landowners and occupiers**
Cumulative Impact Concerns were raised by members of the community about cumulative environmental impacts and that the consultation has not considered the overall assessment of the whole life of the OHL project on the environment, health, mental health or wellbeing. Including the impact the current consultation process is having on the mental health of community members. A number of comments were raised by members of the public indicating that they considered there was no joined-up thinking from SSEN Transmission about the long-term environmental, socio-economic and community impacts. It was considered that	Statutory Consultees Non-statutory consultees Community, organisations & officials Landowners and occupiers	**Cumulative Impact** Cumulative impacts will be assessed in the EIA and reported within the specialist chapters in the EIAR, taking account of other relevant existing and planned infrastructure in the area, including the proposed substations at Hurlie and Emmock. The scope of cumulative assessment in the EIA will be agreed with the ECU in conjunction with consultees. Please also refer to the **Common Themes** discussed in **Section 3.2 – Cumulative Impacts** including our response regarding cumulative impacts.

[10] Information on our Community Benefit Fund: https://www.ssen-transmission.co.uk/information-centre/Community-Benefit-Fund/

Summary of Feedback	Contributing Stakeholder Group	Our Response
the project was being presented and considered in a fragmented way which was underplaying the potential impacts the OHL would have especially on the landscape and communities and livelihoods.		
Mitigation It was noted by some respondents that no mitigation, such as screening or planting could reduce the long-term impact the OHL would have on the landscape and visual amenity. Also, no mitigation or compensation could reduce or minimise the effects of the project on the communities' health and wellbeing including from the stress and anxiety already created by SSEN Transmission's consultation process. It was also considered that no mitigation or compensation could offset the long-term permanent detrimental impacts on the socio-economics of the area, property prices or community viability.	Statutory Consultees Non-statutory consultees Community, organisations & officials Landowners and occupiers	**Mitigation** As noted above in Landscape and Visual, it is acknowledged that with new transmission infrastructure there will be a change to the landscape setting in the areas where the proposed Kintore to Tealing 400 kV OHL would be sited. We seek to avoid impacts in the first instance during the optioneering and routeing study processes for our projects, and then through the alignment and design processes. Where we cannot avoid impacts, mitigation will be applied through the EIA process. Specific mitigation measures will be discussed and agreed with relevant statutory consultees. In addition to mitigation, we will also deliver our commitments to compensatory planting and biodiversity enhancement and suggestions made by consultees will be considered by the project team and incorporated into the design where practical. **Section 3.2** in **Common Themes – Electromagnetic Fields** discusses health and EMF concerns, and **Section 3.2** in **Common Themes – Socio-economic Impacts** discusses community benefits and includes references to papers on these aspects: • **Delivering legacy benefits through Pathway to 2030 Projects** • **Working with landowners and occupiers**

Summary of Feedback	Contributing Stakeholder Group	Our Response
		Our Community Benefit Fund[11] is discussed in Community Viability above. As a regulated business, we are obliged to follow a statutory legal framework under the *Electricity Act 1989* and *Land Compensation Act 1961*. If property owners are entitled to compensation under the legal framework, we will assess any claim on a case-by-case basis under the direction of this legal framework. We will provide a socio-economic report as part of the consent application.
Electromagnetic Interference Some members of the public have raised concerns over the potential adverse impact of the OHL on phone signals, WiFi and the internet, particularly given that phone signals are already patchy in the area. Points were raised about the implications the OHL would have on high pressure gas pipeline corrosion as the proposed corridor is over land hosting five high pressure gas pipelines. It was considered that the corrosion of pipelines due to induced magnetic fields from OHL is documented and more information should be provided on the safety implications of OHL near to gas pipelines which are located close to homes.	Community, organisations & officials Landowners and occupiers	**Electromagnetic Interference** Once the tower positions have been defined (which will be subject to further public consultation), we will engage with mast operators to carry out relevant assessments. Tower repositioning may occur as a result as it is acknowledged that in some instances, the towers can cause interference. Our experience is that mitigation to avoid interference will be achievable. We are engaging with the owners of infrastructure along the routes, including high pressure gas pipelines, and we will discuss detailed consideration of potential interactions with their infrastructure and any necessary mitigation.

[11] Information on our Community Benefit Fund: https://www.ssen-transmission.co.uk/information-centre/Community-Benefit-Fund/

Table 3.3 Environmental Impact

Summary of Feedback	Contributing Stakeholder Group	Our Response
Forestry and Woodland Concerns were raised by respondents relating to the impact on forestry and woodland as a result of the project. Aberdeenshire Council advised that woodland removal should be minimised and compensatory planting would be required which must exceed the area of woodland removed. Aberdeenshire Council also noted that where felling will occur information must be provided relating to what is proposed for the timber. It was noted by a number of respondents that forests and woodlands are used for recreation and education by local schools.	Statutory Consultees Non-statutory consultees Community, organisations & officials Landowners and occupiers	**Forestry and Woodland** Potential impacts to forestry and woodland were considered in the routeing process that was undertaken to inform identification of the proposed routes. It is acknowledged that forestry and woodland is an important contributor to the area's uniqueness, and that national and local planning policy sets out a presumption against tree removal. We will aim to avoid tree removal wherever possible. Where it cannot be avoided, we will endeavour to keep woodland removal to an absolute minimum. In addition to avoiding and minimising tree removal, we will mitigate for any tree loss with compensatory planting and biodiversity enhancement measures which will be agreed with the statutory consultees at key stages in the consenting process. Forestry and woodland impacts will be assessed in detail in the EIA and factored into a number of the other specialised studies in the EIA (e.g. the landscape and visual impact assessments and natural and cultural heritage assessments).
Biodiversity, Habitats, Protected Species and Designated Sites Aberdeenshire Council noted that there is a potential risk associated with the spread of invasive non-native species due to the number of watercourse crossings. Aberdeenshire Council and NatureScot both noted that there are a number of designated sites which form a constraint to the new	Statutory Consultees Non-statutory consultees Community, organisations & officials	**Biodiversity, Habitats, Protected Species and Designated Sites** Wildlife and natural heritage aspects have been a key component in the route options study process undertaken to date. The large number and variety of natural heritage designations is noted. Wherever possible, the route options have avoided designated sites (such as SPAs) and ensured that buffers and clearance areas are left between the project and designated sites to reduce impacts.

Summary of Feedback	Contributing Stakeholder Group	Our Response
route options. These include: Fowlsheugh Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI), Montrose Bay SSSI, SPA and Ramsar Site, Loch of Lumgair SSSI, Eslie Moss SSSI, River Dee Special Area of Conservation (SAC), Loch of Park SSSI, Loch of Skene SPA, SSSI and Ramsar and Old Wood of Drum SSSI. They also provided details specific to a number of route sections which are set out in **Tables 3.5** and **3.6**. Aberdeenshire Council also highlighted a number of Local Nature Conservation Sites (LNCS) that could be adversely impacted by the project. These include: Barmekin Wood LNCS, Mergie LNCS and parts of Strathfinella LNCS. The Council also noted that the River Dee has an additional designation of LNCS which covers a wider area than the SAC designation. NTS indicated that they are seeking to extend the oak pasture woodland at the Old Wood of Drum and noted that the OHL may involve some removal of woodland to the west and north of Drum Castle. NTS stated that any loss of natural habitat should be fully compensated for. A number of members of the community considered that the impact on ecology, habitats and species has not been adequately assessed as no baseline information has been provided. Of particular concern is the impact on biodiversity and the fact that there are no details demonstrating how the project will result in biodiversity net gain as required by local policies. Comments were made about the lasting negative effect on nature and biodiversity that the OHL would have along the route and	Landowners and occupiers	Design of the OHL alignment and access tracks will endeavour to avoid and reduce impacts on habitats and species as far as possible, including areas of Ancient Woodland (AW). Mitigation measures will be identified where required and opportunities for compensatory habitat and biodiversity enhancement will be explored. We note the legislative requirements regarding protected ecological and ornithological sites. It is also recognised that national and local government planning policy has a number of policy objectives related to avoiding and minimising impacts on protected sites and species. We will continue to liaise with statutory consultees through the next stage of the project. This will involve ecologists considering the scope of the EIA in terms of ecological and ornithological surveys and assessments. The following work, which has already commenced, will be progressed as the project develops: • Fieldwork will be undertaken by ecologists and ornithologists to survey key habitats and species along the potential OHL route and provide a baseline understanding of the area's ecological importance. This includes invasive species. • Ecological specialists will be involved in the OHL alignment design and will undertake appraisals, which aim to avoid and mitigate ecological impacts on protected sites and species. • An EIAR will be prepared once the design is finalised (following further public consultation) which will include specific chapters reporting on the predicted ecological and ornithological impacts of the proposals. • There may be the requirement for Appropriate Assessment (under the *Conservation of Habitats and Species Regulations*

Summary of Feedback	Contributing Stakeholder Group	Our Response
beyond. It was considered that the proposed infrastructure posed a risk to local wildlife, habitats, and biodiversity which must be protected and preserved. The effect of EMF on wildlife was also raised, notably bee pollination behaviour. Species of concern noted included, amongst others, red kite, oystercatcher, red squirrel, bats, geese, and badgers.		*2017*) where there is a predicted likely significant effect on qualifying interests of an SAC or SPA. This requirement will be understood following the completion of the ecological and ornithological impact assessments, as part of the EIAR. • The EIAR along with an Appropriate Assessment, should this be required, would be submitted with the Section 37 application to the ECU. We will mitigate any further adverse ecological and ornithological effects with compensatory planting and biodiversity enhancement measures. Species Protection Plans (SPPs) will be agreed with NatureScot for all key protected species which have the potential to be adversely affected by the proposals. For projects of this scale, we will prepare a CEMP prior to construction commencing. Implementation of the CEMP will ensure that best practice measures are employed during construction to prevent pollution including preventing the spread of invasive species. SSEN Transmission has committed to biodiversity net gain (BNG). As the first electricity transmission developer to consult upon and implement an approach to deliver BNG on all new sites, we are already committed to deliver net gain on all projects gaining consent from May 2023 onwards. For the Kintore to Tealing OHL, a BNG assessment will be undertaken and discussions have been ongoing with potential partners for projects to deliver biodiversity-led enhancement projects. We will submit further details on our approach to BNG for this project along with the Section 37 application. Whilst BNG assessment does have a focus on habitats, opportunities to

Summary of Feedback	Contributing Stakeholder Group	Our Response
		provide enhancement for species, through habitat enhancements and/or species-led projects will also be fully explored and reported. The following papers have been prepared to outline SSEN Transmission's commitment to BNG, they can be accessed via the links below: • **Delivering a positive environmental legacy - Biodiversity Net Gain** • **Delivering a positive environmental legacy** In addition to our commitment to BNG, we have also committed to compensatory planting for any trees which require to be felled for the project. The compensatory planting plans are progressed separately to BNG proposals and will look to provide a greater proportion of the replanting as native woodland wherever possible.
Cultural Heritage Aberdeenshire Council agreed that in relation to built heritage, the main relevant factors have been suitably researched and considered. The Council requested that all historic assets are considered within a 5 km search area of the alignment. A number of designations where potential impacts could occur were noted by Aberdeenshire Council, including: conservation areas at Garlogie, Kirkton of Fetteresso and at Auchenblae; and Garden and Designed Landscapes (GDL) at Castle Fraser, Dunecht House, Drum Castle, Park House, Glenbervie House and Fasque House. HES noted a number of assets in the new route options where potential impacts could occur. These are set out in **Tables 3.5** and **3.6**. HES advised that they do not generally recommend	Statutory Consultees Community, organisations & officials Landowners and occupiers	**Cultural Heritage** We are aware of the large number and variety of cultural heritage designations or assets within the proposed route options based on extensive work already completed, and major sites have been avoided wherever possible. Indeed, following the outcome of the May 2023 corridor and route consultation, a decision was made by SSEN Transmission to revisit and extend the substation site selection exercise for the proposed new Fiddes substation, widening the area of search with a view to seeking alternative substation site options, in part due to impacts on cultural heritage assets. We will continue to liaise with statutory and non-statutory consultees through the next stage of the project which will involve cultural heritage specialists considering the scope of the EIA in terms of further cultural heritage surveys and assessments of the potential impacts of the of the project. The assessment on cultural heritage will

Summary of Feedback	Contributing Stakeholder Group	Our Response
forestry should be used as screening mitigation as they may be felled. A number of members of the public raised the social and cultural heritage of the area documented in novels by Lewis Grassic Gibbon who lived in the area and who wrote Sunset Song, along with other authors such as James H. Smythe who wrote The Blethers O'Barrowsgate. The childhood home of Lewis Grassic Gibbon is protected.		be closely aligned with the landscape and visual assessment in terms of character, setting, and reflecting the integrated landscape and cultural heritage importance of GDL designations and the settings of listed buildings. It is recognised that national and local government planning policy has a number of policy objectives related to avoiding and minimising impacts on cultural heritage assets.
Flooding and Water Resources Aberdeenshire Council noted that there are many PWS within the route boundary and SEPA guidance must be followed to avoid adverse impacts and also advised that information should be obtained from Environmental Health to ensure this. Where areas are at high risk of flooding or where areas may result in increased flood risk for nearby properties, Aberdeenshire Council advised that a Drainage Impact Assessment (DIA) will be required and a subsequent Flood Risk Assessment (FRA). SEPA noted that compensatory flood storage areas may be required where landraising occurs within the flood extent. SEPA also noted a number of areas of concern within the route options. These are set out in **Tables 3.5** and **3.6**. Scottish Water highlighted that the new routes fall under a drinking water catchment where an abstraction is located and which is designated as a Drinking Water Protected Area (DWPA). There are also multiple Scottish Water assets within the area.	Statutory Consultees Non-statutory consultees Community, organisations & officials	**Flooding and Water Resources** Areas at risk of flooding have been avoided where possible, although it is acknowledged that in some areas, the OHL may need to cross short sections of land prone to flooding. We note the legislative requirements regarding flood risk and water resources. It is also recognised that national and local government planning policy has a number of policy objectives related to avoiding and minimising impacts on the water environment. The requirement for flood risk assessments will be progressed considering future climate change predictions, and discussions with SEPA are being undertaken. Design development will aim to ensure that the project is not increasing the risk of flooding on project land or elsewhere. We will continue to liaise with consultees throughout the EIA process (notably SEPA, the local authorities and Scottish Water). Information provided during the consultation process (e.g. private water supplies, DWPA etc.) will all be taken into consideration by the project team during the next stage of the project development.

Summary of Feedback	Contributing Stakeholder Group	Our Response
Members of the public questioned the impact the project would have on flood plains, and the suitability of land for OHL which is regularly affected by flooding. It was considered that the impact on flood risk must take into account the impact of the OHL during construction and operation including access routes, laydown areas and foundations. Members of the public raised concerns over the loss of woodland which could then exacerbate flooding issues, as well as destabilising land near rivers causing land slips.		Suitable mitigation will be developed through collaboration with the project's specialist hydrogeology team, the project team, alignment design contractors and other environmental specialists. The assessment will consider construction and operation including methods of working and will take into account aspects such as any necessary tree removal. The prevalence of PWS in some areas of the route options is acknowledged and any potential impacts will be assessed in the EIA following further information gathering and impact assessment. The EIAR will set out mitigation measures required to maintain water supplies.
Contaminated Land Aberdeenshire Council noted that there are many areas of potentially contaminated land within the route boundary (Sections A-F), noting in particular former railway land, two former RAF airfields (Edzell and Fordoun) and several satellite bases which are associated with RAF Fordoun.	Statutory Consultees	**Contaminated Land** A small number of locations of potential contaminated sources have been identified by consultees. The OHL routeing process has sought to avoid these as far as possible. Development of the OHL alignment and any access tracks will take account of relevant information on former land uses, including areas of potential contamination. If avoidance is not possible, further investigations and risk assessments will be undertaken as part of the EIA process.
Cumulative Impact A number of members of the public considered that the project failed to consider the cumulative environmental impact of the entire OHL along with other SSEN Transmission's projects across Scotland which would have a significant impact on cultural heritage, woodlands, ecology and flood risk, and that future climate changes need to also be taken into account.	Community, organisations & officials Landowners and occupiers	**Cumulative Impact** These aspects are discussed in **Table 3.2 Community Impact** and also in **Section 3.2 Common Themes – Cumulative Impacts**.

Summary of Feedback	Contributing Stakeholder Group	Our Response
Mitigation Members of the public noted that impacts to cultural heritage setting must be mitigated, biodiversity net gain details need to be provided as well as details of the areas to be used for drainage, landscaping, screening and habitat enhancement.	Community, organisations & officials Landowners and occupiers	**Mitigation** Our approach to mitigation is discussed above in this table, and in **Table 3.2 Community Impact**. In addition to the proposed mitigation to be included in the EIA, we will set out our commitments to compensatory planting and biodiversity enhancement (see **Biodiversity, Habitats, Protected Species and Designated Sites** above in this table) and suggestions made by consultees will be fully considered by the project and incorporated into the design where practical.

Table 3.4 Economic Impact

Summary of Feedback	Contributing Stakeholder Group	Our Response
Agriculture and Farming Glamis and Area Community Council noted that Angus is nationally renowned for its potato growing industry and the project would present a real risk of the spread of disease. The MSP for Angus North and Mearns Constituency highlighted concerns over biosecurity measures not being adhered to by contractors and sub-contractors of SSEN Transmission in relation to the potato cyst nematode (PCN), as well as potential restrictions to irrigation of crops making some areas unviable for potato or vegetable production. Comments were made by members of the community concerning the damage the OHL would have on the farming industry with the loss of prime agricultural land, access disturbance and risk to food	Statutory Consultees Non-statutory consultees Community, organisations & officials Landowners and occupiers	**Agriculture and Farming** It is acknowledged that the proposed Kintore to Tealing 400 kV OHL will affect areas used for agriculture and farming. As part of the routeing appraisal, agriculture and farming were factored into the appraisal process, however, in some locations, all the route options considered would unavoidably need to cross some areas of prime agricultural land. As the OHL alignment and access tracks are designed, prime agricultural land will be avoided wherever possible. We are aware of the legislative requirements and policy regarding agricultural land, notably relating to avoiding the loss of, and minimising impacts on prime agricultural land. We appreciate the concerns raised and the impact poor biosecurity can have on agricultural activities. Strict biosecurity measures will be

Summary of Feedback	Contributing Stakeholder Group	Our Response
security. This extended to concerns about the impact the OHL would have on the floodplain which may increase the risk of flooding on farmed land. The details of the National Planning Framework 4 (NPF4) policies on soil were noted by a number of respondents. It was considered that land would be taken from farms making them less efficient and less viable. The OHL towers would cause disruption when spraying and irrigating crops, cultivating land, and harvesting crops, making it more dangerous and more difficult to access areas, and operate machinery especially in the dark. Comments were made by some members of the public raising concerns about the health aspect of the OHL and towers on livestock and cows in calf. However, it is also noted by Stonehaven & District Community Council that the construction of OHL would be less disruptive to farmers than if the 400 kV line was underground as the distance between towers means that relatively few will become obstacles to practical farming and they can be located primarily at field edges. The biggest concern from constructing an underground system would be the impacts on hydrology with concern about the impact on the water table flows. The risk of soil borne diseases would become much more significant during construction of an underground cable compared to OHL due to high numbers of plant operations and the quantity of earth moved. Also of concern would be the considerable damage to fields due to soil		required of all site staff, including those undertaking pre-construction surveys, enabling and construction work. Soil sampling for both PCN and Clubroot will be carried out before and after both ground investigation works and construction works. We also appreciate the impact the project may have on individual farms that may be affected, liaison with farmers will continue to understand their businesses and how they use their land. The following paper provides more information on this aspect: • **Working with landowners and occupiers** Comments on the impact of undergrounding on farming compared to OHL are noted. We have been undertaking land referencing to identify landowners along the route, and working with those landowners to identify if there are other interested parties to liaise with. We have been undertaking site meetings with those involved to seek their feedback on our proposals and help influence the design.

Summary of Feedback	Contributing Stakeholder Group	Our Response
compaction and the damage to the field drainage systems which can take 20 years to repair. Some tenant farmers raised concerns that they were not being made aware of the project proposals by their landowners and that their needs and views would not be taken into consideration.		
Tourism and Other Local Businesses Glamis and Area Community Council noted that Angus' economy depends on tourism (as well as farming). They considered that the OHL would damage the tourist appeal of the Vale of Strathmore and the entry to Glamis. Concerns were raised by Stonehaven and District Community Council over impacts to the aesthetic of Stonehaven which could impact the tourism business. Local community members considered that the OHL would damage tourism and local businesses with impacts spanning the construction and operational phases of the project. Concerns were raised about the potential impact of the OHL on the operation of airfields. A number of queries were raised regarding the effects of OHL and EMF on animals and what impact this would have on local businesses along the route.	Statutory Consultees Non-statutory consultees Community, organisations & officials Landowners and occupiers	**Tourism and Other Local Businesses** We note the concerns raised about impacts on local businesses notably tourism. A number of the concerns raised related to the likely impact on local businesses related to landscape, visual and amenity issues. The EIA work will consider these issues and aim to avoid and minimise environmental impacts and introduce mitigation measures to offset or compensate for any residual significant landscape and visual effects. This in turn should help ensure that the impact on businesses and tourism is minimised. We are actively committed to maximising opportunities to support local businesses and the economy throughout the construction phase and work with the main contractors to use local supply chains where possible. Project specific opportunities will be developed, and local partners identified as the project moves towards construction. We will engage with the owners and operators of any airfields to discuss potential impacts and any mitigation that may be required. The following leaflet has been prepared to explain the effects of EMF and the separation distances we apply: • **EMF Leaflet**

Summary of Feedback	Contributing Stakeholder Group	Our Response
		We will provide a socio-economic report as part of the consent application.
Property and Land Value A key concern raised by respondents (including the community councils) was the impact the OHL would have on the value of properties in the areas and their saleability. Comments related to the need for adequate compensation for those affected. Members of the public raised concerns about the impact on land and property values over the short and longer terms, including possible reductions in property prices created by the project already due to SSEN Transmission's consultation activities and decreased marketability due to uncertainty. Some residents considered that they already could not make investments in their property, or sell or remortgage, given the loss of house value and uncertainty in their property.	Statutory Consultees Non-statutory consultees Community, organisations & officials Landowners and occupiers	**Property and Land Value** As a regulated business, we are obliged to follow a statutory legal framework under the *Electricity Act 1989* and *Land Compensation Act 1961*. If property owners are entitled to compensation under the legal framework, we will assess any claim on a case-by-case basis under the direction of this legal framework. We will provide a socio-economic report as part of the consent application. Please refer to **Section 3.2** in **Common Themes – Socio-economic Impacts** and to the following papers which provide more information on these aspects: • **Delivering legacy benefits through Pathway to 2030 Projects** • **Working with landowners and occupiers**
Compensation Many respondents requested that full independent economic studies should be carried out including assessing the full financial implication for homeowners and businesses, and that financial losses should be fully compensated for. Comments were made by the local communities questioning the benefits for their local communities to offset negative impacts.	Statutory Consultees Non-statutory consultees Community, organisations & officials Landowners and occupiers	**Compensation** We understand that there are concerns about the potential impact on properties and businesses within the vicinity of our proposed OHL. Our proposals are still under development and are subject to further consultation and design refinement. During this period, we want to work closely with communities and will engage with property owners and seek to mitigate impacts. We will provide a socio-economic report as part of the Section 37 application. As a regulated business, we are obliged to follow a statutory legal framework under the *Electricity Act 1989* and *Land Compensation Act 1961*. If property owners are entitled to compensation under the legal

Summary of Feedback	Contributing Stakeholder Group	Our Response
		framework, we will assess any claim on a case-by-case basis under the direction of this legal framework. We announced a Community Benefit Fund (details are here: **Delivering legacy benefits through Pathway to 2030 Projects**) which is the first of its kind for a transmission operator in Scotland. This will provide a direct opportunity for us to work with local communities that will be affected by the proposal on a variety of local initiatives. These will directly support communities across the North of Scotland and will be community-led. Please refer to **Section 3.2** in **Common Themes – Socio-economic Impacts** and to the following papers which provide more information on these aspects: • **Delivering legacy benefits through Pathway to 2030 Projects** • **Working with landowners and occupiers**
Cumulative Impact A number of respondents raised concerns that no socio-economic impact assessment has been conducted to ascertain the cumulative impact of all of SSEN Transmission's Net Zero projects on Scotland looking at costs to industry, local businesses, facilities, services and land and property prices.	Community, organisations & officials Landowners and occupiers	**Cumulative Impact** We will provide a socio-economic report as part of the consent application. Please refer to the **Common Themes – Cumulative Impacts** in **Section 3.2** for further information on cumulative assessment at a plan level.

Project Specific Feedback Tables – New Route Options and Refined Routes

As set out in **Section 1.3**, the March-April 2024 consultation specifically sought feedback on:

- New Route Options in Section D (Route D4 and Route D5)
- New Route Options in part of Section E (Route E2 and Route E3)
- New Route Option in Section F (Route F1.3)

The feedback received on these New Route Options is summarised in **Table 3.5** below alongside our responses to the feedback.

As also set out in **Section 1.3**, Refined Routes around 500m wide, within which we aim to identify an optimal alignment, were also presented during the consultation to provide an update on work in progress. Stakeholders were advised they could provide feedback regarding the Refined Routes, which were developed following the November 2023 RoC (found here: Kintore to Tealing OHL RoC November 2023) whilst we work to identify our alignments, or to highlight any comments or questions regarding the changes made in Sections B, D, E and F as detailed in the November 2023 RoC.

These Refined Routes are:

- Route A1
- Route B1.1
- Route C1
- the northern part of Route E1
- the northern part of Route F2

The feedback received on the Refined Routes is summarised in **Table 3.6** below alongside our responses to the feedback. Where changes have been made to the Refined Routes by SSEN Transmission following review of feedback and our ongoing design development work, these are noted in the table. The latest Refined Routes are presented in the figures in **Appendix C** of this report.

Table 3.5 Summary of feedback on New Route Options D4 and D5, E2 and E3 and F1.3

New Route Option	Summary of Key Feedback	Our Response
New Route Options D4 and D5	• Location: - Route D5 too close to the village of Auchenblae and residential properties. - Pinch points at Fordoun in Route D4 particularly in relation to residential properties and the old Fordoun airfield. - the OHL should be as far away from properties and schools as possible. - Route D5 has less impact on people. - Route D5 may affect local businesses. - other developments including other OHL and windfarms should be shown on mapping and taken into consideration. • Landscape and visual – impacts on views from roads, paths, railway lines and residential properties in Routes D4 and D5. Route D5 would affect the Braes of the Mearns SLA. Route D5 likely to be more intrusive as it lies closer to the upland edge compared to Route D4. Cumulative effects on the landscape character from numerous large-scale infrastructure projects being undertaken in the Fetteresso Forest area. • Ecological designations – potential connectivity with **Routes D4** and **D5** and the Fowlsheugh SPA and Montrose Basin SSSI, SPA and Ramsar sites. Impacts from **Routes D4** and **D5** on the Loch of Lumgair and Eslie Moss SSSIs. Area of woodland on the Ancient Woodland Inventory affected. • Cultural heritage designations and interests – a number of Scheduled Monuments (SMs) in **Routes D4** and **D5** may be affected. A number of Category A Listed Buildings (LBs) and GDLs may also be affected although **Route D4** is unlikely to raise issues of national interest. **Route D5** may affect the Auchenblae Conservation Area.	• Having reviewed consultation feedback for this route section, we will take forward the Preferred Route identified in the Consultation Document, **Route D4.** This is because the information and responses provided and our subsequent review has not identified that any of the other route options would be less constrained from an environmental, community, technical or cost perspective. • A landscape and visual impact assessment will form part of the EIA including considering cumulative impacts in areas such as Fetteresso Forest. The EIA work will aim to avoid and minimise environmental impacts and introduce mitigation measures to offset residual significant landscape or visual effects where possible. • The potential connectivity with Fowlsheugh and Montrose Basin SPAs is noted and a HRA will be prepared and submitted alongside the EIAR. An assessment of potential impacts on SSSIs and areas of Ancient Woodland will also be included in the EIA where relevant. • Cultural heritage is being considered by specialist teams and potential impacts to designated and undesignated cultural heritage sites formed a key part of the routeing appraisal process. • Flood risk will be assessed in detail in consultation with SEPA and other consultees during the next stage of design development. Geomorphic Risk will also be assessed. • The former airfield was identified as a high-risk site for contamination and further site investigations will be undertaken. • The location of PWS and other assets will be taken into account in alignment design.

New Route Option	Summary of Key Feedback	Our Response
	• Flooding – wide flood extent associated with the crossing of Luther Water and its tributaries. **Route D5** has less impact on flooding compared to **Route D4**. • Potential Geomorphic Risk identified along the Bervie Water, with further studies advised. • Contaminated land – **Route D4** is within a 1km search area for radioactive substances at the former airfield at Fordoun. • PWS – a number of PWS are located within both **Routes D4** and **D5**. Ice cream factory in Glenbervie draws water supply from the hillside to the northwest of the village. • Infrastructure – **Routes D4** and **D5** cross over Scottish Water infrastructure assets. • BNG – the Bervie Water and Luther Water have been identified as opportunities for riparian planting. Suggestions also to plant hedgerows around fields and link them to watercourses and install barn owl boxes.	• Opportunities for BNG are being explored by SSEN Transmission as part of project development and in line with our BNG commitments.
New Route Options E2 and E3	• Location: - **Route E3** could limit future development in Stonehaven, particularly cumulatively with oil and gas pipeline corridors. - **Route E2** is in a less densely populated area than **Route E3**. - the OHL should be as far away from properties and schools as possible. - consented development should be taken into consideration. • Visual impacts – **Route E3** OHL towers would be highly visible from Stonehaven. • Ecological designations – potential connectivity with the **Route E2 and E3** route options and the Fowlsheugh SPA and the potential for construction impacts on Loch of Lumgair SSSI. **Route E2** passes through a narrow strip of Ancient Woodland.	• Having reviewed consultation feedback for this route section, we will take forward the Preferred Route identified in the Consultation Document, **Route Option E2.** This is because the information and responses provided and our subsequent review has not identified that any of the other route options would be less constrained from an environmental, community, technical or cost perspective. • In response to consultation feedback and subsequent studies undertaken within Section F (see below section on F1.3), a new route option was identified following the consultation period (**Route Option F3**). To provide a connection from option F3 into Section E, a new route option has also been identified within Section E (**option E4**) which would connect from the River Dee southwards through land west of Kirkton of Durris to connect with Route Option E2. Alignment options will be developed and

New Route Option	Summary of Key Feedback	Our Response
	• Cultural heritage designations and interests – **Route E3** is closer to Fetteresso Castle Doocot LB. **Route E2** has no A-Listed LBs or GDL which are likely to be significantly affected. • Soils – **Route E2** has the potential to have a greater impact on carbon-rich soils. • Potential Geomorphic Risk identified along the Cowie Water in **Route E3** with further studies advised. • Agriculture – **Route E2** routes the OHL away from quality farmland, prime agricultural land should not be developed on. • Contaminated land – Elf Hill possible WW2 Spitfire crash site. Potential to discover plane site during construction works. • PWS – a number of PWS are located within both route options. • Infrastructure – **Routes E2** and **E3** cross Scottish Water infrastructure assets. • Socio-economics – **Route E3** could impact the tourism business in Stonehaven due to OHL visibility. Recreation – **Route E3** passes over areas of recreational use, such as the Hill of Swanley. Potential impact on the recreational use of Fetteresso Forest from **Routes E2 and E3**. • BNG – the Cowie Water has been identified as high priority for riparian planting and biodiversity net gain opportunities.	appraised alongside options in Route Options E2 and E1 at the next stage of the project. • A landscape and visual impact assessment will form part of the EIA. The EIA work will aim to avoid and minimise environmental impacts and introduce mitigation measures to offset residual significant landscape or visual effects wherever possible. • The potential connectivity with Fowlsheugh SPA is noted and a HRA will be prepared and submitted alongside the EIAR. An assessment of potential impacts on SSSIs and areas of Ancient Woodland will also be included in the EIA where relevant. • Cultural heritage is being considered by specialist teams and potential impacts to designated and undesignated cultural heritage sites formed a key part of the routeing appraisal process. • The points regarding carbon rich soils and Potential Geomorphic Risk are noted and further consideration will be given to this issue during the next stage of design development. • The comments regarding agricultural land and contaminated land are noted. • The location of PWS and other assets will be taken into account in alignment design. • Potential impacts on recreational uses along the route including areas such as Fetteresso Forest will be assessed as part of the EIA. • Opportunities for BNG are being explored by SSEN Transmission as part of project development and in line with our BNG commitments.
New Route Option F1.3	• Environmental appraisal – no environmental appraisal prior to the announcement of the proposed **Route F1.3**. • Location:	• The development of **Route F1.3** followed the consideration of feedback from the May to July 2023 consultation and further assessment work, as detailed in the March 2024 consultation

New Route Option	Summary of Key Feedback	Our Response
	- **Route F1.3** too close to Drumoak. - multiple alternative routes available that would avoid the villages, properties and schools e.g. to the west of Drumoak and Park villages. - the OHL should be as far away from properties and schools as possible, and 200 m buffer at least should be achieved. - **Route F1.3** affects areas with existing planning allocations / permissions. - **Route F1.3** is shown on old base mapping and the size of some communities e.g. Drumoak are under-represented. - **Route F1.3** would affect a greater number of homes, families, and individuals than the previously proposed routes. • Landscape – **Route F1.3** is in an SLA, and has a significant impact due to its location on high land. • Visual impacts – impacts on local views including visual impact on salmon fishery. • Ecological designations – **Route F1.3** is located at a further distance from the Loch of Skene SPA, SSSI and Ramsar sites than the previously preferred option Route F1 but there is still potential connectivity. Impact of **Route F1.3** on the River Dee SAC, Loch of Park and the Old Drum of Wood SSSIs, Ancient Woodland Inventory (Long-established woodlands of plantation origin (LEPO)) and woodland close to Drum Castle. A number of trees with Tree Preservation Orders (TPO) are present along the eastern edge of Drumoak. • Soils – an area of peatland within **Route F1.3** is nationally important. Opportunities for peatland restoration suggested. Possible impact on salmon fishery from silt / run-off.	booklet and document. Route F1.3 was appraised prior to the March 2024 consultation and the results of the environmental, technical and cost appraisals were set out within the consultation booklet and document. • Following a comprehensive review of stakeholder responses and further information from field surveys, we intend to take forward **Route F1.3** to the alignment stage (see **Section 4** for more information). • In addition, an alternative **Route F3,** located to the west of Drumoak, has been identified following a review of stakeholder feedback and further information from field surveys, and this will also be taken forward to the alignment stage - see **Section 4** and our press release from 1 May 2024 (found here: SSEN Transmission commits to consider community and landowner proposed alignments on Kintore-Tealing 400 kV project - SSEN Transmission (ssen-transmission.co.uk)) for further information. • All consultation feedback comments relating to routeing are noted. Our proposals are still under development and are subject to further consultation and design refinement. The alignment taken forward will be developed to take account of key constraints and issues highlighted from consultation including proximity to properties and schools and land designated for future development. • A landscape and visual impact assessment will form part of the EIA. The EIA work will aim to avoid and minimise environmental impacts and introduce mitigation measures to offset residual significant landscape or visual effects where possible. • The potential connectivity with the Loch of Skene SPA and the River Dee SAC is noted and a HRA will be prepared and submitted alongside the EIAR. An assessment of potential

New Route Option	Summary of Key Feedback	Our Response
	• Cultural heritage designations and interests – a number of SMs in **Route F1.3** may be affected e.g. Normandykes Roman camp. An appraisal of the impacts on Park House, Drum Castle LB and GDL are required. Impacts on other cultural heritage assets e.g. Keith's Tower, Drumoak Castle grounds and other LBs along the route. **Route F1.3** would pass to the west of Drum Castle which is preferable to the previously preferred option. • Flooding – wide future flood extent associated with the River Dee crossing. • Agriculture – the effect on flood plains may have a consequential effect on prime agricultural land and affect drainage patterns. • PWS – a number of PWS are located within the route. • Infrastructure – **Route F1.3** lies in the Mannofield catchment and crosses over a number of Scottish Water infrastructure assets including distribution main aqueducts and trunk mains. **Route F1.3** also lies on two oil and gas pipelines. • Socio-economics – **Route F1.3** is too close to the village of Drumoak with significant detrimental impacts on the socio-economics of the communities (loss of property value, depopulation). • Health – **Route F1.3** is too close to properties and schools (and recreational areas used by schools) in the village of Drumoak with significant detrimental impacts on health and well-being. A 250 m buffer should be applied between the OHL and homes as well as schools. The SSEN Transmission specified 170 m safe distance from occupied properties is not met.	impacts on SSSIs and areas of Ancient Woodland will also be included in the EIA where relevant. • The points regarding carbon rich soils are noted and further consideration will be given to this issue during the next stage of design development. • Cultural heritage is being considered by specialist teams and potential impacts to designated and undesignated cultural heritage sites formed a key part of the routeing appraisal process. • Flood risk will be assessed in detail in consultation with SEPA and other consultees during the next stage of design development. • Points regarding possible impacts on agricultural land will be considered as part of the flood risk assessment. • The location of PWS and other assets will be taken into account in alignment design. • Concerns about the potential impact of the OHL on properties and communities are noted. The alignment design and EIA work will aim to avoid and minimise environmental impacts. This in turn, along with our new Community Benefits Fund (see **Common Themes** in **Section 3.2 – Socio-economic Impacts**) should help ensure that the impact on communities is minimised and communities gain local benefits. • Please refer to **Common Themes** in **Section 3.2 – Electromagnetic Fields** for responses regarding EMF from OHL and associated health concerns. The 170 m separation distance between OHL and occupied properties is a target but it may not be practically feasible at all locations. • Opportunities for BNG are being explored by SSEN Transmission as part of project development and in line with our BNG commitments.

New Route Option	Summary of Key Feedback	Our Response
	• BNG – the River Dee has been identified as high priority for riparian planting and biodiversity net gain opportunities. Other suggestions included removing weirs and increasing recreational opportunities along watercourses.	

Table 3.6 Summary of feedback on Refined Routes - Route A1, Route B1.1, Route C1, the northern part of Route E1 and the northern part of Route F2

Refined Route	Summary of Key Feedback	Our Response
Refined Route A1	• Clarity sought on why the Preferred Route was categorised as not requiring any changes. • Location – the OHL should be located on the eastern side of Ironside, Kincaldrum and Finlarg Hills alongside the existing line. • Landscape – the preferred route would result in towers being visible on the skyline resulting in an impact to the landscape character of the area including the approach to Glamis village and Glamis Castle. • Visual impacts – impacts on views, specific areas of concern: from A928, Lumley Den, Strathmore, Glamis, the Angus Glens, Cairngorms, Kirriemuir, Ironside Hill, Kincaldrum, Finlarg Hills and Charleston. • Recreation – the area is used recreationally by locals and visitors who would be affected.	• **Route A1** was the Preferred Route in the May 2023 consultation and was confirmed as the Proposed Route in the November 2023 RoC. As set out in the RoC, compared with Route A1.1, Route A1 was assessed as likely to give rise to fewer conflicts with key characteristics of the landscape and, as it avoids more settlements, would be less visible overall. Thus, on balance, **Route A1** was the marginally preferred option over Route A1.1 in terms of environmental, technical and cost criteria. • The information and responses provided to the May 2023 route consultation and our subsequent review of these did not identify that any of the other route options would be less constrained from an environmental, community, technical or cost perspective. • A landscape and visual impact assessment will form part of the EIA. The EIA work will aim to avoid and minimise environmental impacts and introduce mitigation measures to offset residual significant landscape or visual effects where possible. • Impacts on recreational uses will be assessed as part of the LVIA and reported in the EIAR. • An alignment will be developed within the proposed **Route A1** that will consider the consultation feedback received on the Refined Route including key landscape and visual receptors. • The Refined Route has been amended slightly to reflect the requirement to connect with the proposed Emmock Substation at the southern end, and at the northern end to avoid constraints including areas of land subject to flooding (see **Figure C1.2** in **Appendix C**).
Refined Route B1.1	• Questions raised about how property constraints have been determined between **Route B1** and Refined **Route B1.1** i.e. in 2023 B1 was reported to have less properties affected but in 2024 B1.1 was reported to have less properties affected.	• **Route B1.1** was not the Preferred Route in the May 2023 consultation but was confirmed as the Proposed Route in the November 2023 RoC. As set out in the RoC this was because, following review of feedback on the 2023 route consultations, Route

Refined Route	Summary of Key Feedback	Our Response
	• Location: - preference for Route B1.1 better than Route B1 as it takes the OHL away from houses. - preference for a northern alignment in vicinity of Careston Route B1.1. - Route B1.1 may affect local businesses. - Route B1.1 close to gas pipeline. • Landscape – **Route B1.1** has more significant impacts on Angus Council landscape area[12]. Northern route considered less visible. • Cultural heritage designations – impact on Tannadice village Conservation Area. • Habitat / ecological designations – **Route B1.1** crosses an area located on the River South Esk that contains very good habitat for fish and invertebrates. **Route B1.1** has more significant impacts on the SAC. • BNG – **Route B1.1** has fewer biodiversity net gain opportunities. • Flooding – **Route B1.1** is in a low-lying area which floods regularly. Significant flooding and river route changes at River Noran/Vayne Castle/Hilton of Ferne. Road over bridge near Blackhall is impassible in flooding. Opportunities to avoid Noran Water should be explored. • Agriculture – **Route B1.1** has more significant impacts on the highest quality agricultural land and it also severs agricultural land rendering farms unviable.	B1.1 was considered to have slightly less environmental constraint than Route B1 and has greater potential to avoid proximity to the River South Esk SAC (both Route Options B1 and B1.1 cross the River South Esk SAC however a tributary of the river, the Lemno Burn, which forms part of the SAC designation, runs for approximately 5 km through the centre of the southern part of Route B1. Also, the central part of Route B1 incorporates sections of the main river in its northern fringes, with approximately another 6km section running very close to the river) and other areas of flood risk associated with watercourses. Route B1.1 was also considered, on review, to have slightly lower levels of property constraints than those encountered along Route B1 as there are fewer 'pinch point' locations between groups of properties and/or between properties and other key constraints. • Following comprehensive review of feedback from community representatives and landowners, and further information from field surveys, we intend to widen part of **Route B1.1** around Careston to take forward to the alignment stage **see Section 4** and our press release from 1 May 2024 (found here: SSEN Transmission commits to consider community and landowner proposed alignments on Kintore-Tealing 400 kV project - SSEN Transmission (ssen-transmission.co.uk)) for further information. • A landscape and visual impact assessment will form part of the EIA. The EIA work will aim to avoid and minimise environmental impacts and introduce mitigation measures to offset residual significant landscape or visual effects where possible. • The comments noting that Route B1.1 has more significant impacts on the SAC and fewer opportunities for BNG are noted and will be

[12]A consultation was held by Angus Council between November 2023-January 2024 into four proposed Local Landscape Areas. The consultation is now closed and the final report had not yet been published for final committee approval – for details see Local Landscape Areas in Angus | Engage Angus

Refined Route	Summary of Key Feedback	Our Response
		considered further by the specialist teams during the next stage of the project. • Flood risk will be assessed in detail in consultation with SEPA and other consultees during the next stage of design development. • The comments regarding agricultural land are noted and will be considered further by specialist teams during the next stage of the project. • An alignment will be developed within the proposed **Route B1.1** that will consider the consultation feedback received on the Refined Route. • The Refined Route has been amended to provide flexibility to consider alignment options at Justinhaugh and Careston and to connect with **Route A1** at the southern end (see **Figure C2.2** in **Appendix C**).
Refined Route C1	• Location: - Route C1 may affect local businesses. - other developments including windfarms should be shown on mapping and taken into consideration. • Landscape – **Route C1** would be likely to have less of an effect on landscape character or the surrounding landform. • Visual impacts – significant effects on views from a range of receptors (roads, paths, residential properties) within the route section. • Ecological designations – new proposed LNCS. • Flooding – Westside in **Route C1** is a floodplain and north of Inchbare. Field behind Edzell Woods floods and Westwater floods regularly. • Recreation – Capo Plantation is used for recreation.	• The information and responses provided to the May 2023 route consultation and our subsequent review of these did not identify that any of the other route options would be less constrained from an environmental, community, technical or cost perspective. • A landscape and visual impact assessment will form part of the EIA. The EIA work will aim to avoid and minimise environmental impacts and introduce mitigation measures to offset residual significant landscape or visual effects where possible. Notably at key prominent views along the route. • We will ensure we keep our records up to date with any new designations. • Flood risk will be assessed in detail in consultation with SEPA and other consultees during the next stage of design development. • Impacts on recreational uses will be assessed as part of the LVIA and reported in the EIAR.

Refined Route	Summary of Key Feedback	Our Response
		• An alignment will be developed within the Proposed **Route C1** that will consider the consultation feedback received on the Refined Route. • The Refined Route has been amended slightly at the northern end to avoid key constraints including residential properties and designated woodland (see **Figure C3.2** in **Appendix C**).
Refined Route E1 (northern part)	• Landscape – potential impacts on the special qualities of the Dee Valley SLA where the route crosses the River Dee. • Ecological designations – potential connectivity with **Route E1** and the Fowlsheugh SPA and the potential for impacts on Loch of Lumgair SSSI. **Route E1** contains an area of Ancient Woodland. • Cultural heritage designations and interests – SMs in **Route E1** may be affected e.g. Clochanshiels cairns, houses and field systems, Glenton Hill house etc. • Agriculture – **Route E1** would affect prime agricultural land. **Route E1** would also have a direct detrimental effect on a number of farms which would take many years to recover rendering them unviable. • PWS – a number of PWS are located within **Route E1.** • Infrastructure – **Route E1** cross Scottish Water infrastructure assets. • Recreation – crossing of the River Dee, located to the north of **Route E1** would have impacts on recreational routes within the valley.	• The information and responses provided to the May 2023 route consultation and our subsequent review of these did not identify that any of the other route options would be less constrained from an environmental, community, technical or cost perspective. • In response to consultation feedback and subsequent studies undertaken within Section F (see section on **Route Option F1.3** in **Table 3.5**), a new route option was identified following the consultation period (**Route Option F3**). Due to the distance between Refined Route E1 and the new Route Option F3 in the southern part of Section F, we needed to identify another route option which would connect to Route F3 and provide an alternative crossing of the River Dee. A new route option has been identified (**Route Option E4**) which would connect from the River Dee southwards through land west of Kirkton of Durris to connect with Route Option E2. This option is close to and follows the existing overhead line through commercial forestry, which may allow use of existing access tracks and the opportunity to follow the existing overhead line operational corridor. • Alignment options will be developed and appraised alongside options in Route Options E2 and E1 at the next stage of the project. • A landscape and visual impact assessment will form part of the EIA. The EIA work will aim to avoid and minimise environmental impacts and introduce mitigation measures to offset residual significant landscape or visual effects where possible.

Refined Route	Summary of Key Feedback	Our Response
		• The potential connectivity with the Fowlsheugh SPA is noted and a HRA will be prepared and submitted alongside the EIAR. An assessment of potential impacts on SSSIs and areas of Ancient Woodland will also be included in the EIA where relevant. • Cultural heritage interests are being considered by specialist teams and potential impacts to designated and undesignated cultural heritage sites formed a key part of the routeing appraisal process and will be considered as part of the alignment process. • The comments regarding agricultural land are noted and will be considered further by specialist teams during the next stage of the project. • The location of PWS and other assets will be taken into account in alignment design. • Impacts on recreational uses will be assessed as part of the LVIA and reported in the EIAR. • An alignment will be developed within the Proposed **Route E1** that will consider the consultation feedback received on the Refined Route. • The Refined Route has not been amended in this section.
Refined Route F2 (northern part)	• Questions raised about selection of **Route F2**, including that people in Route F2 had not fed back in 2023 because it was indicated Route F1 was preferred. Assertion that the differences between Routes F1 and F2 were narrow and that environmental issues taken more seriously than impacts on people/communities. • Location: - **Route F2** too close to the villages of Echt and Dunecht. - **Route F2** too close to new housing that has been built in Corskie Park Dunecht and other consented developments (not yet shown on OS base mapping).	• A preferred route was consulted on in 2023 however feedback was also invited on all route options initially considered in Section F. Following receipt of consultation feedback in 2023 and further survey work, the route option appraisals were reviewed and on balance **Route F2** was considered to have less overall technical and environmental constraint than the equivalent section of **Route F1**. The appraisals take account of a range of land use, property and community and environmental constraints. • Following the review of stakeholder responses, we intend to widen **Route F2** at two locations, Schoolhill (which was shown on the Section F Refined Route map during the March to April 2024 consultation) and in the area east and southeast of Echt see

Refined Route	Summary of Key Feedback	Our Response
	- the OHL should be as far away from properties and schools as possible. - the affordable housing allocation on land north of Forbes Park may now be lost due to the proximity of **Route F2**. - multiple alternative routes are available that would avoid the villages, properties and schools e.g. to the back of / west of Echt. - access from the east is constrained by flooding and gas pipelines. - **Route F2** affects Echt show car parking field. - encirclement of properties to the north of Barmeckin Hill Fort, pinch point with properties and the existing OHL. • Landscape – **Route F2** would affect the character of the landform and landcover pattern of the wider Dunecht/Barmekin Hill area. • Visual impacts – significant visual impacts in **Route F2.** • Ecological designations – potential connectivity with the route option and the Loch of Skene SPA, SSSI and Ramsar site. The section contains Ancient Woodland Inventory woodland. • Cultural heritage designations and interests –an appraisal of the impacts on Dunecht House GDL is required. Other impacts on cultural heritage assets caused by the alignment east of Echt closest to the Barmekin Hill Fort and other LBs along the route. • Flooding – Potential for flooding in **Route F2** notably to the southeast of Echt, in Peterculter from the Gormack Burn and west of Dunecht. OHL would change hydrology and increase flooding and drainage patterns. • Agriculture – Impacts on **Route F2** flood plains may have a consequential effect on prime agricultural land and affect drainage patterns.	**Section 4** and our press release from 1 May 2024 (found here: SSEN Transmission commits to consider community and landowner proposed alignments on Kintore-Tealing 400 kV project - SSEN Transmission (ssen-transmission.co.uk)) for further information. The widened route will be taken forward to the alignment stage. • All consultation feedback comments relating to routeing are noted. Our proposals are still under development and are subject to further consultation and design refinement. The alignment taken forward will be developed to take account of key constraints and issues highlighted from consultation including proximity to properties and schools and land designated for future development. • A landscape and visual impact assessment will form part of the EIA. The EIA work will aim to avoid and minimise environmental impacts and introduce mitigation measures to offset residual significant landscape or visual effects where possible. • The potential connectivity with the Loch of Skene SPA, SSSI and Ramsar site is noted and a HRA will be prepared and submitted alongside the EIAR. An assessment of the potential impact on Ancient Woodland will also be included in the EIA where relevant. • Cultural heritage interests are being considered by specialist teams and potential impacts to designated and undesignated cultural heritage sites formed a key part of the routeing appraisal process and will be considered as part of the alignment process. • Flood risk will be assessed in detail in consultation with SEPA and other consultees during the next stage of design development. Points regarding possible impacts on agricultural land will be considered as part of the flood risk assessment. • The location of PWS and other assets will be taken into account in alignment design. • Concerns about the potential impact of the project on properties and communities are noted. The EIA work will aim to avoid and minimise

Refined Route	Summary of Key Feedback	Our Response
	• PWS – a number of PWS are located within the route option. • Socio-economics – **Route F2** too close to the villages of Echt and Dunecht with significant detrimental impacts likely on the socio-economics of the communities (loss of property value, depopulation). • Health and amenity – OHL too close to properties and schools (and recreational areas used by schools) in the villages of Echt and Dunecht with significant detrimental impacts health and well-being. A 250 m buffer should be applied between the OHL and homes as well as schools. The SSEN Transmission specified 170 m safe distance from occupied properties is not met. Specific concerns were raised about **Route F2** and the impact it would have on the demographics of the area caused by health effects. • Recreation – impacts to recreational uses such as walking routes around the Dunecht area and Barmekin Hill, which are located in the north of **Route F2**. **Route F2** crosses core paths.	environmental impacts. This in turn, along with our new Community Benefits Fund (see **Common Themes** in **Section 3.2** – **Socio-economic Impacts**) should help ensure that the impact on communities is minimised and communities gain benefits. • Please refer to **Common Themes** in **Section 3.2 – Electromagnetic Fields** for responses regarding EMF from OHL and health concerns. The 170 m separation distance between OHL and occupied properties is a target but it may not be practically feasible at all locations. • Impacts on recreational uses will be assessed as part of the LVIA and reported in the EIAR. • The Refined Route has been amended to provide flexibility to consider alignment options in the vicinity of Echt and to allow for potential connection with new Route F3 at the southern end (see **Figure C6.2** in **Appendix C**).

Alongside the specific responses for each section discussed above in **Tables 3.5** and **3.6** the following points are also noted and will be taken into consideration at the next stage of the project:

- PWS – investigations into PWS are ongoing and a PWS impact assessment will be included as part of the EIA.
- Scottish Water infrastructure – assets will be avoided wherever possible and further liaison with Scottish Water will be undertaken during the next stage of the project.
- Third party infrastructure – we are engaging with the owners of infrastructure along the routes, including high pressure gas pipelines, and we will discuss detailed consideration of potential interactions with their infrastructure and any necessary mitigation.
- Potential BNG – opportunities and suggestions for BNG such as riparian planting, woodland planting, peatland restoration, habitat restoration etc. will be explored further.

4. Summary of Key Decisions

4.1. Introduction

This section sets out the key decisions that we have made following analysis and review of consultation feedback. The information presented confirms the Route Options being taken forward to the next stage of OHL development, outlines where decisions have been made in relation to the route options and identifies the reasons. The aim of this section is to provide clarity on the Route Options being taken forward and those no longer being considered.

As set out in Section 1 of this report, the public consultation held from March to April 2024 sought feedback on New Route Options proposed for parts of Sections D, E and F. This was a result of SSEN Transmission having decided to seek alternative substation site options to those previously presented (in the May to July 2023 consultation) for Fiddes. In addition, following the identification of Proposed Routes in some sections of the project following the May to July 2023 consultation (as described in the November 2023 RoC), Refined Routes, approximately 500 m wide, were presented at the March to April 2024 consultation. The Refined Routes provided an update on our work to date and stakeholders were advised that they could provide feedback on these.

After the consultation period closed, we analysed the feedback including comments received specifically on the Route Options D4, D5, E2, E3 and F1.3 which are summarised in **Section 3** of this report. The consultation also received feedback on Refined Routes for Route Options A1, B1.1, C1, E1 and F2 and this has been used to inform the development and appraisal of alignment options which will be presented for consultation in Autumn 2024. In some cases, the Refined Routes have been amended following feedback and from SSEN Transmission's updated information on constraints within each route option. These amendments will allow for thorough consideration of alignment options in key areas of the proposed route.

4.2. Outcome of consultation on New Route Options D4, D5, E2, E3 and F1.3

Five new Route Options were presented for consultation in March to April 2024: Routes D4 and D5 in the northern part of Section D and Routes E2 and E3 in the southern part of Section E, and Route F1.3 in the southern part of Section F.

The Preferred Options[13], following SSEN Transmission's appraisal process, were Routes D4, E2 and F1.3. The Route Options to be taken forward for alignment design development are presented below.

Route D4. The key findings of the appraisal for this option are:

- With respect to environmental criteria, Route D4 is slightly more constrained by proximity to residential dwellings (primarily due to a constrained 'pinch point' near Fordoun), however, Route D5 is constrained to a greater extent by natural heritage designations, landscape designations and cultural heritage designations. It is considered that Route D5 may compromise the conservation status of the Strathfinella LNCS, the special qualities of the Braes of the Mearns SLA and the setting of the Auchenblae Conservation Area through which part of the route option passes. The environmental constraints identified for Route D5 relating to the potential for greater alignment impact on landscape,

[13] The Preferred Option is that which SSEN Transmission has identified as the best balance of technical and environmental impact considerations identified through initial appraisal. This is then subject to consultation with stakeholders, where local and previously unknown considerations may confirm or alter the initial preference. Once confirmed, this becomes the Proposed Option to take forward to the next stage of project development.

natural heritage and cultural heritage designated sites than for Route D4 would be difficult to mitigate at later alignment stages and contribute to the preference for the option which avoids these areas.

- With respect to technical criteria, Route D5 is considered to have a marginally lower level of technical constraints particularly the ability to maintain further distance from residential properties, maintaining minimum separation distances to wind turbines and avoiding potential contaminated land risk at the former RAF Fordoun site. However, Route D5 encounters much steeper terrain and would require more angle towers than Route D4 to achieve required changes in direction of any alignment. Angle towers are considered to have a greater visual impact when compared to line towers and they are also more expensive and complex to construct and maintain. The technical constraints identified for Route D4 can be managed through the OHL alignment design process including through the application of mitigation (e.g. to address any land quality issues so that these do not constrain tower placement) and wherever possible through avoidance of property constraints.
- With respect to cost considerations, Route D4 is likely to be the lower cost option but broadly comparable to Route D5. However, the environmental and technical considerations noted above are the key drivers of route preference.

On balance across environmental, technical and cost considerations Route D4 was considered to represent the least constrained option. The feedback from consultation has not identified any significant issues which suggest the Preferred Route option should be changed. Route D4 will therefore be taken forward as the Proposed Route[14] in Section D. This is shown in **Figure 4.1** and **Appendix C**, **Figure C4.1.**

Route E2. The key findings of the appraisal of this option were:

- With respect to environmental criteria, both routes are considered largely comparable. Route E2 is slightly more constrained due to the requirement to cross a small strip of Ancient Woodland (listed on the Ancient Woodland Inventory) located within the route. Route E3 is more constrained for land use due to the extent and areas of commercial forestry present within the route option at Fetteresso Forest. Route E3 is considered slightly less preferred on balance to Route E2 because the commercial viability of the forestry operations could be compromised. The potential for Route E2 to impact on the area of Ancient Woodland could also be mitigated through sensitive OHL alignment design.
- With respect to technical criteria, Route E2 is considered to have a lower level of technical constraint and provides the opportunity to utilise the operational corridor of the existing Kintore to Fetteresso XS2 & XS1 OHL, which is currently being uprated to 400 kV as part of the East Coast 400 kV Phase 1 project[15]. Route E2 is slightly more constrained by the elevation of the land, but Route E3 is more constrained by the number of minor roads to be crossed and the number of angle towers that will be required.
- Route E2 is the least constrained option from a technical perspective and it is considered feasible through OHL alignment design to mitigate potential impacts on the small strip of Ancient Woodland e.g. by using a natural gap in the canopy to reduce and avoid tree felling.
- With respect to cost considerations, Route E2 is likely to be the lower cost option but broadly comparable to Route E3. However, the environmental and technical considerations noted above are the key drivers of route preference.

On balance across environmental, technical and cost considerations Route E2 was therefore considered to represent the least constrained option. The feedback from consultation has not identified any significant issues which suggest the preferred route option should be changed. Route E2 will therefore be

[14] A route taken forward following stakeholder consultation to the alignment selection stage of the overhead line routeing process.
[15] Information available at: https://www.ssen-transmission.co.uk/projects/project-map/east-coast-400kv-ohl-upgrade/

taken forward as the proposed route in the southern part of Section E. This is shown in **Figure 4.1** and in **Appendix C**, **Figure C5.1**.

Route F1.3. Route F1.3 was presented for consultation in the southern part of Section F. This was considered to have fewer environmental and land use constraints than the previously preferred option (Route F1) including:

- The crossing of the River Dee to the west of Drumoak Church would help to avoid listed buildings and scheduled monuments and properties in what is a very constrained location. A crossing to the west of the church would also span a narrower section of the flood risk area associated with the River Dee
- A river crossing downstream of Drumoak allows the position of the OHL route to be maintained from previous consultation and to pass through the eastern edge of the Dee Valley Special Landscape Area (SLA).
- The river crossing location for Route Option F1.3 would avoid passing through designated areas at the Loch of Park SSSI and Park House GDL which significantly constrain the southern part of more westerly route options also previously considered (F2 and F2.1).
- North of Drumoak, Route Option F1.3 would pass to the southwest of Drum Castle GDL which would help to avoid constraints associated with the setting of the castle and the sensitive area of woodland to the east of the GDL.
- In the central part of Section F, following Route Option F1.3 would help to avoid areas important for protected birds (including raptor species) and would avoid land close to the western edge of populous communities at Westhill and Peterculter which includes areas used by the community for amenity and recreation. It would also avoid passing through part of the Aberdeen Green Belt.
- Route Option F1.3 also relieves some of the technical constraints when crossing the River Dee in comparison to the other proposed routes. In practice this is likely to mean a reduced number of, and size of, angle towers to navigate these constraints.

On balance across environmental, technical and cost considerations Route F1.3 is considered less constrained than the previously preferred option (Route F1). Feedback from consultation has identified it would be desirable for an additional option to be considered, further from Drumoak. Route F1.3 will therefore be taken forward for OHL alignment design development, alongside a further option referred to as F3 (see below section titled 'Additional options identified following consultation'). Route F1.3 is shown in **Figure 4.1** and **Appendix C**, **Figures C6.1** and **C6.2.**

4.3. Amended Refined Routes

Feedback from consultation with communities and landowners indicated that it would be desirable to consider revisions to some areas of the Refined Routes (that were presented in the March to April 2024 consultation) to provide for sufficient consideration of alignment options in positioning the OHL in parts of the routes in Section A, B, C and F. These are briefly highlighted below.

Route Option A1. The route option has been refined slightly at the southern end to facilitate an OHL alignment connection with the proposed Emmock Substation, and at the northern end to avoid areas of key land use and environmental constraint including land at risk of flooding. The amended Refined Route is shown in more detail in **Appendix C, Figure C1.2**.

Route Option B1.1. This route option has been refined in two locations:

- at Justinhaugh, where the route option crosses the River South Esk, to allow for consideration of alignments which have greater potential to avoid environmental and property constraints; and

- in the area between Tannadice and Careston, providing the opportunity (through consideration of alignment options at the next stage of design development) to take the overhead line further from land use and environmental constraints, properties and to provide a more preferable route from a technical perspective.

The updated route is shown in **Figure 4.1** and **Appendix C**, **Figure C2.1.** The amended Refined Route area is shown in more detail in **Appendix C, Figure C2.2**.

Route Option C1. The route option has been refined slightly at the northern end to avoid key constraints including residential properties and designated woodland. The amended Refined Route is shown in more detail in **Appendix C, Figure C3.2**.

Route Option F2. An area has been identified to the east of the settlement of Echt in the northern part of Section F which provides the opportunity to develop an OHL alignment with greater separation from the village compared with that available within the original boundary of Route Option F2 previously consulted on. This widened Route Option F2 (see **Appendix C**, **Figure C6.2**) will provide greater flexibility to develop alignment options.

The appraisal of alignment options to be developed within the widened areas at Justinhaugh, between Tannadice and Careston and near Echt will be compared with the constraints associated with other potential alignments within the respective route option areas. The findings of these appraisals will be presented as part of the proposed alignment consultation in Autumn 2024.

4.4. Additional options identified following consultation

Additional options have been identified to take forward to alignment development based on the feedback from the March to April 2024 consultation.

We have identified further options which have been introduced in response particularly to feedback from stakeholders on various environmental and community sensitivities in the Drumoak area. An option, referred to here as **F3**, has been identified in Section F to the west of the village of Drumoak, primarily located within the southern section of the previous Route Option F2.1. This option would provide the potential for an OHL connection, approximately 3.5 km in length, from the River Dee near West Park to link with Route Option F2 northwest of Drumoak (see **Figure 4.1** and **Appendix C, Figures C6.1 and C6.2**).

To provide a connection from option F3 into Section E, option **E4** has been also identified within an area to the west of the former Route Option E1.2. The option would connect from the River Dee southwards through land west of Kirkton of Durris then through the upland area of Durris Forest to connect with Route Option E2. This option is approximately 8.5 km in length running broadly in parallel with, and west of, Route Option E1 (see **Figure 4.1** and **Appendix C, Figures C5.1 and C5.2**).

These options are narrower than route options identified previously as survey and appraisal work undertaken to date has allowed constraints to be identified to rationalise the available width for a potential alignment in these areas. The options will continue to be evaluated in line with SSEN Transmission's Routeing Procedure. The findings of the environmental, technical and cost appraisal of them will be considered alongside potential OHL alignments within comparative sections of Route Options E1 and F1.3 and the findings will be presented as part of the proposed alignment consultation in Autumn 2024.

4.5. Route Options being taken forward to alignment

Following the outcomes of the consultation described above, we can confirm the Route Options to be taken forward to the OHL alignment design stage in Sections A to F are:

- **Route Option A1**. This is the previously preferred route option for Section A, initially presented in May 2023. The information and responses provided at consultation, and our subsequent review, has not identified that any further changes are required from an environmental, community or technical perspective. The Refined Route has been slightly amended at the southern and northern ends to allow for connection with Emmock Substation and respond to identified constraints respectively. The route is shown in **Figure 4.1** and in **Appendix C**, **Figure C1.1**. A refined route is shown within the proposed route, see **Appendix C**, **Figure C1.2.** 'Refined routes' around 500 m wide, within which we aim to identify an optimal alignment, are provided as an update on work in progress and are still subject to change as design and assessment work progresses.
- **Route Option B1.1**. This is the previously preferred route for Section B which has been further refined following consultation feedback and representations from landowners. In response to community feedback this route option has been refined at Justinhaugh and widened in the area between Tannadice and Careston, providing the opportunity (through consideration of alignment options) to take the overhead line further away from environmental receptors, properties and to find a more preferable alignment from a technical perspective. The updated route is shown in **Figure 4.1** and **Appendix C**, **Figure C2.1**. The updated refined route is shown within the proposed route, see **Appendix C**, **Figure C2.2.** 'Refined routes' around 500 m wide, within which we aim to identify an optimal alignment, are provided as an update on work in progress and are still subject to change as design and assessment work progresses.
- **Route Option C1**. This is the previously preferred route option for Section C. The information and responses provided at consultation, and our subsequent review of these, has not identified that any further changes are required from an environmental, community or technical perspective. The Refined Route has been slightly amended at the northern end to respond to identified constraints. This is shown in **Figure 4.1** and in **Appendix C**, **Figure C3.1**. A refined route is shown within the proposed route, see **Appendix C, Figure C3.2**. 'Refined routes' around 500 m wide, within which we aim to identify an optimal alignment, are provided as an update on work in progress and are still subject to change as design and assessment work progresses.
- **Route Option D4**. Following the decision set out above to adopt Route Option D4 as the proposed route, this option will be taken forward for OHL alignment design development. The route is shown in **Figure 4.1** and **Appendix C**, **Figure C4.1**.
- **Route Option E1.** This is the previously preferred route option in the northern part of Section E. The information and responses provided at consultation, and our subsequent review, has not identified that any further changes are required from an environmental, community or technical perspective. This option will be taken forward for OHL alignment design development, alongside consideration of Option E4 (see above section titled 'Additional options identified following consultation'). This option is shown in **Figure 4.1** and in **Appendix C**, **Figures C5.1** and **C5.2**.
- **Route Option E2**. Following the decision set out above to adopt Route Option E2 as the proposed route in the southern part of Section E, this option will be taken forward for OHL alignment design development, alongside consideration of Option E4 (see above section titled 'Additional options identified following consultation'). This is shown in **Figure 4.1** and in **Appendix C, Figure C5.1**.
- **Route Option E4**. An additional option identified from stakeholder consultation (see above section titled 'Additional options identified following consultation') for which an alignment will be identified and appraised alongside Route Options E2 and E1. This is shown in **Figure 4.1** and in **Appendix C, Figure C5.1**.
- **Route Option F1.3.** This route option in the southern part of Section F is considered to have fewer environmental and land use constraints than the previously preferred option (Route Option F1), as

discussed in Section 4.2 above. This option will be taken forward for OHL alignment design development, alongside **Option F3** (see above section titled 'Additional options identified following consultation'). This option is shown in **Figure 4.1** and **Appendix C**, **Figure C6.1** and **C6.2**.

- **Route Option F2**. This is the previously preferred route in the northern part of Section F which has been further refined following consultation feedback to allow for consideration of OHL options at the alignment stage. In response to community feedback this route option has been widened in the area east of Echt (see section above on 'Amended refined route options'), to provide opportunities to develop and appraise alignments which avoid key property and settlement constraints. This route option is shown in **Figure 4.1** and **Appendix C**, **Figure C6.1** and **C6.2**.
- **Route Option F3**. An additional option identified from stakeholder consultation (see above section titled 'Additional options identified following consultation') for which an alignment will be identified and appraised alongside Route Option F1.3. This is shown in **Figure 4.1** and in **Appendix C, Figure C6.1**.

We will undertake an alignment consultation in Autumn 2024. The consultation will present an update on the development and comparative appraisal of alignment options in Sections A to F within the proposed Route Options listed above.

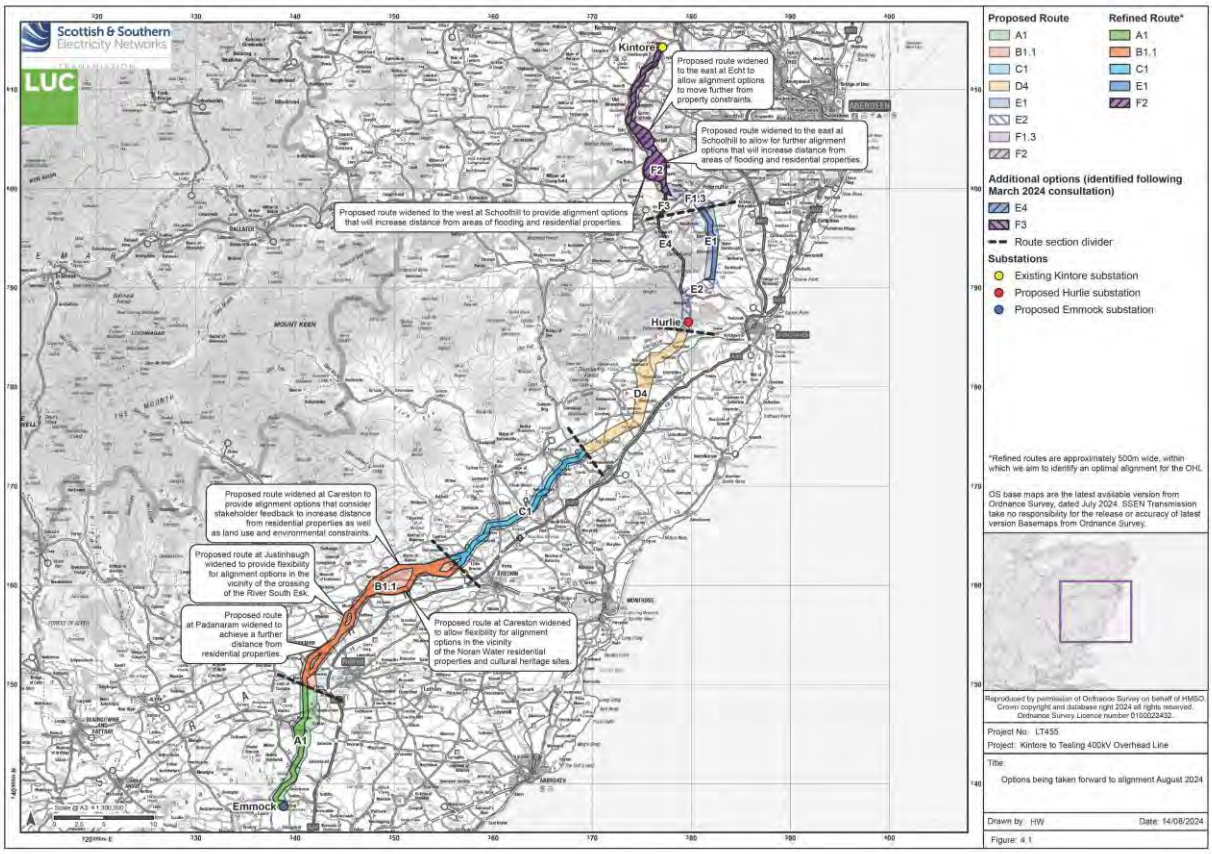
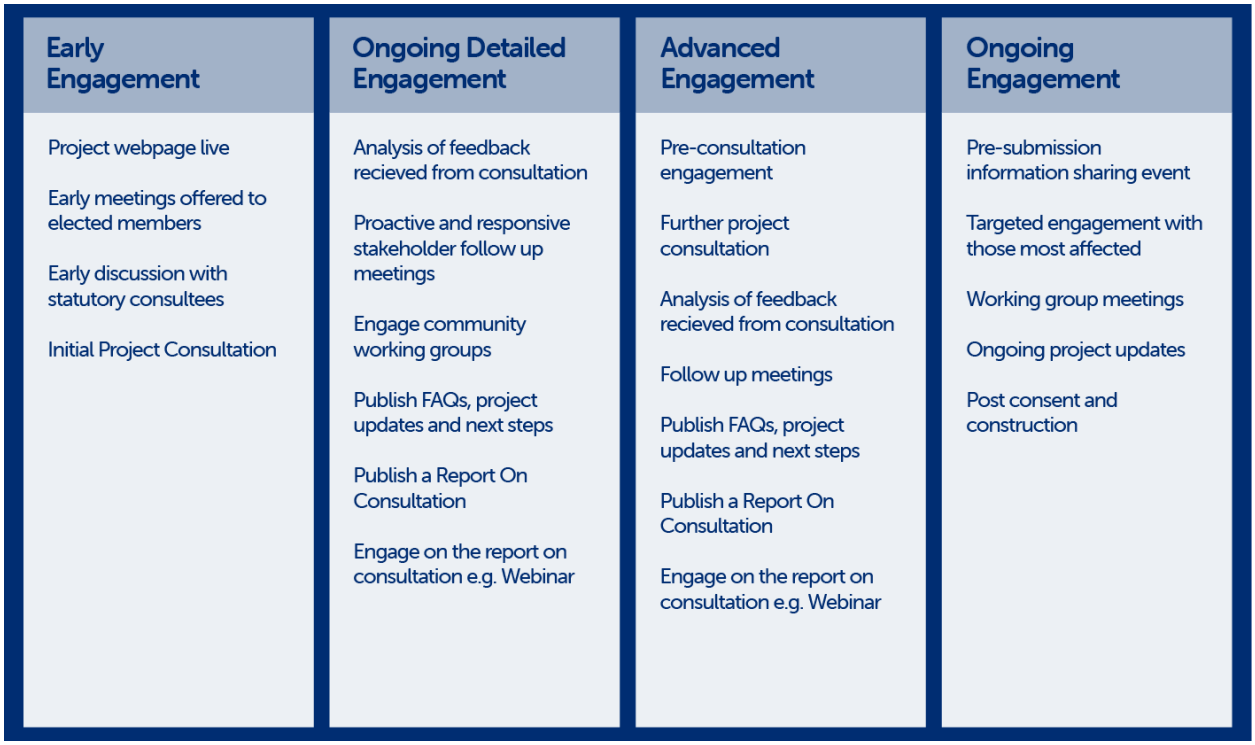


Figure 4.1: Options being taken forward to alignment August 2024 (see also Appendix C)

5. Next Steps

5.1. Ongoing engagement

The period of consultation described in this report is part of an ongoing engagement process that spans the full development cycle for the project, where feedback is sought at different stages and engagement with stakeholders is continuous as we refine our proposals.



Following publication of this RoC, we, alongside specialist consultants and contractors, will further develop the design of the OHL to find an acceptable alignment through the proposed route sections shown in **Figure 4.1**. In Autumn 2024, we will hold our next public consultation. At this consultation stakeholders will be provided with alignment options for the OHL accompanied by the environmental, technical, and cost appraisals.

A request for an EIA Scoping Opinion is also being made to The Scottish Government Energy Consents Unit and an EIA Scoping Report has been prepared and is being submitted to support the request. The request for a Scoping Opinion is made to identify the scope of impacts to be addressed and the method of assessment to be applied in the Environmental Impact Assessment Report which is prepared and submitted with the Section 37 application for consent. Once validated, the Scoping Report will be available here: Scottish Government - Energy Consents Unit.

5.2. Feedback

Feedback on this Report or about the project is welcome via our Community Liaison Team who can be contacted using the details below. If you wish to receive project updates and event information, please also contact us using the details below to request to join the mailing list.

Community Liaison Manager
TKUP@sse.com
Scottish and Southern Electricity Networks Transmission
10 Henderson Road,
Inverness
IV1 1SN

Further information about the project is available on the project website.

6. Glossary

Term	Definition
400 kV	400 kilovolt (400,000 volt) operating voltage electrical circuit
AIS Substation	An Air Insulated Switchgear (AIS) substation is constructed with switchgear which relies on open air components, which can require large clearance areas for operation and safety, which takes up a larger area of land than Gas Insulated Switchgear (GIS).
Alignment	A centre line of an overhead line OHL, along with location of key angle support structures.
Amenity	The natural environment, cultural heritage, landscape and visual quality. Also includes the impact of SSEN Transmission's works on communities, such as the effects of noise and disturbance from construction activities.
Ancient Woodland	Defined in National Planning Framework (NPF) 4 as "land that has maintained continuous woodland habitat since at least 1750".
AWI	Ancient Woodland Inventory (AWI) is a provisional guide to the location of Ancient Woodland. It contains three main categories of woodland, all of which are likely to be of value for their biodiversity and cultural value. These include Ancient Woodland, Long-established woodlands of plantation origin (LEPO), and other woodlands.
Area of Search (Study Area)	A broad geographical area within which possible sites might be capable of identification within approximately 5 km of the required connectivity point; usually determined by geographical features such as coastlines or hill/mountain ranges, or designation boundaries, such as National Park boundaries.
ASTI	Accelerated Strategic Transmission Infrastructure is a regulatory framework. This framework will assess, fund and incentivise the accelerated delivery of the large, strategic onshore transmission projects required to deliver the government's ambition to connect up to 50 GW of offshore wind generation to the network by 2030.
AWI	Ancient Woodland Inventory (AWI) is a provisional guide to the location of Ancient Woodland. It contains three main categories of woodland, all of which are likely to be of value for their biodiversity and cultural value. These include Ancient Woodland, Long-established woodlands of plantation origin (LEPO), and other woodlands.
BNG	Biodiversity Net Gain (BNG) is an approach to development that aims to leave the natural environment in a measurably better state than it was pre-development. It focuses on the change in the biodiversity value of a site,

Term	Definition
	comparing the pre and post construction biodiversity values to ensure a positive impact overall.
Conductor	A metallic wire strung from support structures, to carry electric current.
Consultation	The dynamic process of dialogue between individuals or groups, based on a genuine exchange of views and, normally, with the objective of influencing decisions, policies or programmes of action.
Corridor	A linear area which allows a continuous connection between the defined connection points. The corridor may vary in width along its length; in unconstrained areas it may be many kilometres wide. A corridor should also take into account any pinch points along its length where subsequent design development of the OHL may be subject to fundamental restrictions which may limit the eventual viability of a project or gaining consent.
Cumulative Effect	Cumulative effects assessment is a key part of the EIA process and is concerned with identifying circumstances in which a number of potential and/or predicted effects from separate existing or future development projects could combine to cause a significant effect on a particular receptor.
Double circuit	A double circuit transmission line comprises of two independent circuits each made up of three sets of conductors (cables).
EIA	Environmental Impact Assessment. A formal process codified by EU directive 2011/92/EU, and subsequently amended by Directive 2014/52/EU. The national regulations are set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 as amended. The EIA process is set out in regulation 4(1) of the regulations and includes the preparation of an EIA Report by the developer to systematically identify, predict, assess and report on the likely significant environmental impacts of a proposed project or development.
Engagement	The establishment of effective relationships with individuals or groups.
ESO	National Grid is the Electricity System Operator (ESO) for Great Britain. The ESO balances electricity supply and demand to ensure the electricity supply.
GDLs	The Inventory of Gardens and Designed Landscapes (GDLs) lists those gardens or designed landscapes which are considered by a panel of experts to be of national importance.
GIS Substation	A Gas Insulated Switchgear (GIS) substation is constructed with switchgear with gaseous reliant components which allows operation and safety clearances to be reduced compared to an AIS substation.

Term	Definition
Habitat	Term most accurately meaning the place in which a species lives, but also used to describe plant communities or agglomerations of plant communities.
Holford Rules (as modified)	Principles used to inform the routeing of OHL and siting of substations.
Kilovolt (kV)	One thousand volts.
LCT	Landscape Character Type (LCT) is a distinct, recognisable and consistent pattern of elements in a landscape that differentiate the area from another.
Listed Building	Building included on the list of buildings of special architectural or historic interest and afforded statutory protection under the 'Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997' and other planning legislation. Classified in three categories: A, B C(S).
Micrositing	The process of positioning individual structures to avoid localised environmental or technical constraints.
Mitigation	Term used to indicate avoidance, remediation or alleviation of adverse impacts.
NSA	National Scenic Area is a national level designation applied to those landscapes considered to be of exceptional scenic value.
Offshore Integrated Link	Offshore cable connection between the onshore network and offshore network being developed as part of the Coordinated Offshore Network. This is being developed as a result of the Holistic Network Design (HND) publication in summer of 2022 produced by National Grid Electricity System Operator (NGESO) to facilitate greater co- ordination and efficiency for offshore windfarms. In the Autumn of 2022 Ofgem published their Asset Classification findings which in turn meant SSENT were tasked with delivering large parts of the Coordinated Offshore Network.
OHL	Overhead line. An electric line installed above ground, usually supported by lattice steel towers or wooden poles.
Planning Application	An application for planning permission under the Town and Country Planning (Scotland) Act 1997, as amended by the Planning etc. (Scotland) Act 2006. It should be noted that consent under section 37 of the Electricity Act 1989 usually carries with it a direction from the Scottish Ministers under Section 57 of the Town and Country Planning (Scotland) Act 1997 that planning permission be deemed granted
Plantation Woodland	Woodland of any age that obviously originated from intentional planting.
Preferred Option	The option which SSEN Transmission has identified as the best balance of technical and environmental impact considerations identified through initial

Term	Definition
	appraisal. This is then subject to consultation with stakeholders, where local and previously unknown considerations may confirm or alter the initial preference. Once confirmed, this becomes the Proposed Option to take forward to the next stage of project development.
Proposed Route	A route taken forward following stakeholder consultation to the alignment selection stage of the overhead line routeing process.
RAG Rating	A Red, Amber, Green rating provided to allow for a comparison between different options being appraised.
Refined Route	A route approximately 500 m wide, within which we aim to identify an optimal alignment.
RLB	Red Line Boundary (RLB). This area should include all land necessary to carry out the Proposed Development.
Riparian Woodland	Natural home for plants and animals occurring in a thin strip of land bordering a stream or river.
Route	A linear area of approximately 1 km width (although this may be narrower/wider in specific locations in response to identified pinch points / constraints), which provides a continuous connection between defined connection points.
Routeing	The work undertaken which leads to the selection of a proposed alignment, capable of being taken forward into the consenting process under Section 37 of the Electricity Act 1989.
Scheduled Monument	A monument which has been scheduled by the Scottish Ministers as being of national importance under the terms of the 'Ancient Monuments and Archaeological Areas Act 1979'.
Section 37 application	An application for development consent under section 37 of the Electricity Act 1989.
Semi-natural Woodland	Woodland that does not obviously originate from planting. The distribution of species will generally reflect the variations in the site and the soil. Planted trees must account for less than 30% of the canopy composition
SSSI	Site of Special Scientific Interest. Areas of national importance designated by NatureScot under the Nature Conservation (Scotland) Act 2004. The aim of the SSSI network is to maintain an adequate representation of all natural and semi-natural habitats and native species across Britain.
Span	The section of overhead line between two tower structures.

Term	Definition
SAC	Special Area of Conservation - designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as - The Habitats Directive), to ensure that rare, endangered or vulnerable habitats or species of community interest are either maintained at or restored to a favourable conservation status.
LLA	Local Landscape Areas are designated by local planning authorities for sites which are considered to be of regional/local importance for their scenic qualities.
SPA	Special Protection Area – designated under Directive 2009/147/EC on the Conservation of Wild Birds (the Birds Directive) to protect important bird habitats.
Stakeholders	Organisations and individuals who can affect or are affected by SHE Transmission works.
Study Area	A defined area for the consideration of effects (including direct, indirect and cumulative) on each relevant factor listed under Regulation 4(3) of the EIA regulations
Substation	A node on the network to allow safe control of the electricity network. This could include convergence of multiple circuits, transformation of voltage or other functions to maintain and operate the electricity network.
Substation Site Area	Site area identified as necessary to deliver all the substation infrastructure requirements e.g. platform, access tracks, temporary construction area, drainage including SUDS, landscaping.
SUDS	Sustainable Urban Drainage Systems (SUDS) are drainage solutions that provide an alternative to the direct channelling of surface water through networks of pipes and sewers to nearby watercourses.
Terminal Structure	A structure (tower or pole) required where the line terminates either at a substation or at the beginning and end of an underground cable section.
The National Grid	The electricity transmission network in Great Britain.
UK BAP	The UK Biodiversity Action Plan (UK BAP) was published in 1994 after the Convention on Biological Diversity. It summarised the most threatened species and habitats in the UK and gave detailed plans for their recovery.
Volts	The international unit of electric potential and electromotive force.
Wayleave	A voluntary agreement entered into between SSEN Transmission and a landowner upon whose land an overhead line is to be constructed for the installation and retention of the transmission equipment.

Term	Definition
WLA	Wild Land Area, as classified by NatureScot.
Works	Constructing new transmission infrastructure such as substations, overhead lines, underground cables; major refurbishment of these; the dismantling and removal of any parts of the system; and associated works, which may include formation of access tracks, bridge and road improvements, tree cutting, drainage etc.

Appendix A - Example of Advertisement

Scottish & Southern Electricity Networks
TRANSMISSION

Kintore to Tealing 400kV Projects

Pre-application consultation events

We are holding statutory pre-application consultation events for our proposed substations; Hurlie in Fetteresso Forest and Tealing (Emmock). The pre-application process is a key first step in the Town and Country planning process for national planning applications.

During our drop-in events you will be able to view further information about our proposed substation sites, meet the team, ask questions and share feedback ahead of our second public events. We will also be consulting on new routes proposed following the publication of our Report on Consultation in December 2023 as well as the sections of existing overhead line that require to be upgraded between Alyth to Tealing and Tealing to Westfield.

The overhead line reconductor events will be held on:

Monday 4 March, 2–7pm
Errol Village Hall, Errol

Tuesday 5 March, 2–7pm
Tayside Institute Community Centre, Newburgh

Wednesday 6 March, 2–7pm
Alyth Town Hall, Alyth

Thursday 7 March, 2–7pm
Tealing Village Hall, Tealing

The substation and new overhead line events will be held on:

Tuesday 5 March, 2–7pm
Memus Community Hall, Memus

Wednesday 6 March, 2–7pm
Reid Hall, Forfar

Thursday 7 March, 2–7pm
Tealing Village Hall, Tealing

Tuesday 12 March, 2–7pm
Brechin City Hall, Brechin

Wednesday 13 March, 2–7pm
Echt Village Hall, Echt

Thursday 14 March, 2–7pm
Dickson Hall, Laurencekirk

Tuesday 19 March, 2–7pm
Drumlithie Village Hall, Drumlithie

Wednesday 20 March, 2–7pm
Drumoak Bowling Club, Drumoak

Thursday 21 March, 2–7pm
Auchenblae Village Hall, Auchenblae

If you have any questions, please do not hesitate to contact our Community Liaison Manager:

Rhiannon Merritt
SSEN Transmission, 10 Henderson Road, Inverness, IV1 1SN
Email: tkup@sse.com
@ssentransmission @SSETransmission

Hurlie 400kV:

Tealing 400kV:

Find out more and register for project updates, visit the project website by scanning the QR code, or use the following URLs:
https://bit.ly/3HFQOw1
https://bit.ly/48W3BX7

Appendix B - Statutory and Non-statutory Consultee Responses and SSEN Transmission's Replies

Appendix B - Statutory and Non-statutory Consultee Responses and SSEN Transmission's Replies

Table B.1 Statutory consultee feedback

Organisation	Statutory Consultee Feedback	Our Response
Statutory Consultees – excluding Community Councils		
Aberdeen City Council	As the proposed line does not enter Aberdeen City Council area, our comments are restricted to those made previously – that there should be LVIA viewpoints produced from within the City looking westwards towards the line - near to the River Dee and Little Eddieston are suggested.	Aberdeen City Council's comments regarding required viewpoints have been received and are being included in the surveys to inform the Landscape and Visual Impact Assessment (LVIA).
Aberdeenshire Council	**1 Principle of Development** Principle of Development The proposal qualifies as a national development within the context of National Planning Framework 4 as strategic renewable electricity generation and transmission infrastructure and therefore receives broad support in principle under Policy 11 of NPF4, subject to compliance with a number of factors. At a local level Policy C2 of the ALDP 2023 also offers broad general support for the provision of renewable energy infrastructure so long as they are appropriately sited and adopt a suitable design. Further considerations include but are not limited to renewable energy targets, landscape and visual aspects, natural heritage, traffic and transport, noise and historic environment. In principle the Development Plan provides high level support for development of this nature, subject to detailed assessment and consideration of the likely environmental impacts; and avoidance of unacceptable significant impacts. Mitigation will be expected in terms of noise and visual impact whilst the proposal will also have to demonstrate Biodiversity Net Gain (BNG). Natural Heritage and Landscape Impact on Trees The first consideration for all woodland removal decisions should be whether the underlying purpose of the proposals can reasonably be met without resorting to	1 We acknowledge Aberdeenshire Council's Local Development Plan 2023 Planning Policies as well as the Scottish Government's National Planning Framework (NPF) 4 policies relevant to the proposed development and note that the project qualifies as a national development. Design development will continue and an Environmental Impact Assessment (EIA) will be undertaken which will consider site and design, landscape and visual aspects, natural heritage, traffic and transport, noise and historic environment. Mitigation will be considered for all potential significant impacts and will be detailed in the Environmental Impact Assessment Report (EIAR). Biodiversity enhancement measures will be discussed with consultees and opportunities to develop habitat enhancement projects will be explored. The following papers have been prepared to outline SSEN Transmission's commitment to biodiversity net gain (BNG):

Organisation	Statutory Consultee Feedback	Our Response
	woodland removal. Scottish Government's Policy on Control of Woodland Removal clearly sets out a strong presumption in favour of protecting Scotland's woodland resources. https://forestry.gov.scot/support-regulations/control-of-woodland-removal In line with Scottish Government's wider objective to protect and expand Scotland's woodland cover, applicants are expected to develop their proposal with minimal woodland removal. Woodland removal should be allowed only where it would achieve significant and clearly defined additional public benefits. The following criteria for determining the acceptability of woodland removal should be considered relevant to this application: • **Woodlands with a strong presumption against removal.** Only in exceptional circumstances should the strong presumption against woodland removal be overridden. Proposals to remove these types of woodland should be judged on their individual merits and such cases will require a high level of supporting evidence. Where woodland removal is justified, the Compensatory Planting (CP) area must exceed the area of woodland removed to compensate for the loss of environmental value. • **Woodland removal with a need for compensatory planting.** Design approaches that reduce the scale of felling required and/or converting the type of woodland to another type (such as from tall conifer plantation to low-height, slow growing woodland), must be considered from the earliest stages, rather than removing the woodland completely. The purpose of any required CP is to secure, through new woodland on site (replanting) or off site (on appropriate sites elsewhere), at least the equivalent woodland-related net public benefit embodied in the woodland to be removed. Adopted and published by Scottish Ministers on Monday 13 February 2023, National Planning Framework 4 - Policy 6 Forestry, Woodlands and Trees identifies several themes that should be considered relevant to this application: • 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.	• **Delivering a positive environmental legacy - Biodiversity Net Gain** • **Delivering a positive environmental legacy** We acknowledge the Scottish Government's NPF4 Policies on the control of woodland removal and other Scottish Government strategies for forestry and biodiversity. We will apply the mitigation hierarchy in the development of the OHL and we will seek to minimise woodland loss and, where this may be required, we will seek to reduce that loss through the sensitive siting of the OHL. Detailed ecology and woodland surveys have commenced, and data collected has been fed into the appraisals. Surveys are on-going and will continue to inform alignment design development. Forestry and woodland impacts will be assessed in detail in the EIA and factored into other specialised studies in the EIA (e.g. the landscape and visual impact assessments, the noise and vibration assessments, and natural and cultural heritage assessments). In addition to avoiding and minimising tree removal, we will mitigate for any tree loss with compensatory planting and biodiversity enhancement measures which will be discussed with the statutory consultees at key stages in the consenting process. See the above linked BNG papers which outline SSEN Transmission's commitment to BNG:

Organisation	Statutory Consultee Feedback	Our Response
	• 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. The wider Scottish Government environmental strategies must be considered in relation to this application, including but not limited to: • 1) 'Biodiversity Strategy to 2045: tackling the nature emergency'. The Scottish Government Biodiversity Strategy's Vision and Outcomes directly references Riparian Woodland and Woodland Connectivity. • Strategic Vision And Outcomes - Biodiversity strategy to 2045: tackling the nature emergency - draft - gov.scot (www.gov.scot) • 2) 'Scotland's Forestry Strategy 2019-2029' Scotland Forestry Strategy Strategic Drivers includes; 'Natural assets, environmental quality and biodiversity', in which the importance of native and semi natural woodland is specifically referenced and includes the below extract: "All Scotland's forests, woodlands and associated open ground habitats provide some biodiversity value. However, suitably managed native, and in particular ancient and seminatural woodlands, including appropriately restored plantations on ancient woodland sites (PAWS), will contribute the most." Strategic drivers - Scotland's Forestry Strategy 2019–2029 - gov.scot (www.gov.scot) • Scottish Forestry advises the developer to consider the policies and strategies outlined in this letter when selecting routes and aligning the operating corridors within a preferred route. • Scottish Forestry advises the developer to include a specific chapter on Forestry in future consultation documents and provide detailed information on the types and areas of forestry to be felled and restocked as a result of the proposed development. Detailed information on any compensatory planting proposals should also be provided. All felling, restocking and compensatory planting proposals must be compliant with the UK Forestry Standard (5th Edition).	All required consents and approvals are noted and will be sought at the appropriate stage of the project. Further information on woodland can be found in **Table 3.3 Environmental Impact**. 2 SEPA's comments on Route E2 are noted. 3 Wildlife and natural heritage aspects have been a key component of the route options study process undertaken to date, and the large number and variety of natural heritage designations is noted, from international sites to local wildlife sites, and including areas of woodland identified on the ancient woodland inventory for Scotland. We note NatureScot's continued engagement regarding the collection of information to inform the HRA. Detailed ecology surveys have commenced, and data collected from the surveys as well as data collected from desk-top sources has been fed into the appraisals and will continue to be used to inform the projects' development. It is noted that some Local Nature Conservation Sites (LNCS) are identified to protect geological and geomorphological features. Measures to avoid the spread of invasive non-native species (INNS) will be managed through a Construction Environmental Management Plan (CEMP) prior to construction commencing. Implementation of the CEMP will ensure that best

Organisation	Statutory Consultee Feedback	Our Response
	https://forestry.gov.scot/sustainable-forestry/ukfs-scotland • Scottish Government's policy on control of woodland removal: implementation guidance February 2019 https://forestry.gov.scot/supportregulations/ control-of-woodland-removal provides guidance on the level and detail of information Scottish Forestry will expect within the EIA Report, to help us reach an informed decision on the potential impact of the proposed development. • Any additional felling which is not part of the planning application will require permission from Scottish Forestry under the Forestry and Land Management (Scotland) Act 2018 (the Act). For areas covered by an approved Long Term Forest Plan (LTFP), the request for additional felling (and subsequent restocking) areas needs to be presented in the form of LTFP amendment. https://forestry.gov.scot/support-regulations/felling-permissions • The applicant should note that any compensatory planting required as a result of the proposed development, may also need to be considered under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017. https://forestry.gov.scot/support-regulations/environmental-impactassessment and should follow the process for preparing a woodland creation proposal, as set out in our guidance booklet: Woodland Creation Application Guidance. https://forestry.gov.scot/supportregulations/woodland-creation Consider impact on TPO trees.	practice measures are employed during construction to control pollution and INNS spread. As noted above we will mitigate for any tree loss with compensatory planting and biodiversity enhancement measures which will be agreed with the statutory consultees at key stages in the consenting and construction process. 4 We note the policies on design and sense of place and the comments provided by Aberdeenshire Council on landscape and visual matters in relation to the Route Sections which are set out in **Tables 3.2 Community Impact.** All details will be passed on to the project EIA team. 5 All impacts on / from contaminated land will be fully considered as part of the EIA and detailed risk assessments will be undertaken where required. Aberdeenshire Council's comments on waste, construction noise and dust will be addressed in the EIA and any subsequent CEMP prior to construction commencing. Implementation of the CEMP will ensure that best practice measures are employed during construction to control pollution minimise environmental impacts and manage waste and materials. Consultation will be undertaken with key stakeholders including Aberdeenshire Council at the time of preparation. We note SEPA's guidance on private water supplies (PWS) and we will seek information from Aberdeenshire Council's Environmental Health
	2 Impact on Peat SEPA has commented that Route E2 has potentially more impact on carbon rich soils although with careful siting of infrastructure this likely impact could be significantly reduced.	
	3 Impact on Habitats In terms of habitats, given the number of watercourse crossings and area involved consideration of risk associated with spread of INNS should be considered early in the route selection process.	
	Impact on Protected Species Habitat Regulation Appraisal (HRA) NatureScot will continue to engage with SSEN on the gathering and production of information to inform the HRA.	

Organisation	Statutory Consultee Feedback	Our Response
	Impact on Ornithology NatureScot have stated that there are many protected sites in proximity with the proposed routes and due to the nature of their interests (primarily birds) may be impacted by the proposals. These will need to be fully taken into account as alignment decisions and the potential impacts robustly assessed.	department to ensure that the proposals do not adversely affect any existing private water supplies. Appropriate mitigation will be applied to any supplies found in the vicinity of the site. The requirement for borrow pits will be considered at a later stage. Borrow pits are usually identified by the construction contractor and relevant permissions for borrow pits are sought by them. All details will be passed on to the project EIA team. 6 An abnormal loads assessment will be completed and used to inform the access strategy for the project and the EIA in due course. It is acknowledged there will be some impacts from road traffic movements during the construction and operation of the project and as a responsible developer we will do all we can to minimise and mitigate traffic impacts which will be assessed as part of the EIA process and managed through requiring the contractor to implement a Construction Traffic Management Plan (CTMP). Access to OHL tower locations for construction and maintenance will seek to utilise existing roads and access tracks (upgrading where required) as far as practicable to reduce the need for new accesses and the disruption that may cause. Provision for permanent access and parking for maintenance purposes will be part of the project design. We intend to produce a CTMP and note the requirements you set out including in relation to
	Designated Sites A number of ecological constraints are identified in the new route options and include the following: Fowlsheugh Special Protection Area (SPA); Montrose Basin Site of Special Scientific Interest (SSSI), SPA and Ramsar; Loch of Lumhair SSSI; Eslie Moss SSSI; River Dee Special Area of Conservation (SAC); Loch of Park SSSI; Loch of Skene SPA, SSSI and Ramsar; and Old Drum of Wood SSSI. All designated sites must be taken into account and potential impacts robustly assessed. We are aware that NatureScot has provided detailed comments on each of the above so will not provide more detailed comments at this stage. In addition to the above, the Council's Natural Environment Team have highlighted a number of Local Nature Conservation Sites (LNCS) which could be impacted by the proposed development and include Barmekin Wood, Mergie and parts of Strathfinella. The River Dee is also and LNCS for a broader range of interests and with a wider margin than the SAC and the Loch of Park LNCS covers a wider area than the SSSI. LNCS information can be found here Local Nature Conservation Sites - Scotland - Dataset - Spatial Hub Scotland. NESBReC hold the data for these and will be able to provide habitat date and full species list for each site. It should be noted that some LNCS are identified to protect geological and geomorphological features.	
	Biodiversity enhancement The requirement for biodiversity enhancement is currently being discussed separately with the SSEN BNG team and this approach is welcomed.	
	4 Siting and Design Layout siting and design should be carefully considered to minimise its prominence in the landscape and should comply with Policy 14 Design, quality and place of NPF4 and Policy P1 Layout, Siting and Design of the LDP.	

Organisation	Statutory Consultee Feedback	Our Response
	Landscape Impact Comments on landscape and visual matters were provided by the Council on the corridor selection for the proposed 400 kV transmission line (set out in Consultation Document May 2023). This response on the revised alignment and general route options is based on review of the route maps for Sections C-F and on the Consultation Document produced by SSEN dated March 2024. Key concerns in relation to potential effects on landscape character and on valued landscapes are set out for each section of the route below: • Section C: Route C1 appears likely to minimise effects on the character of the prominent and dramatic upland edge and the more complex and diverse landform and landcover pattern characteristic of the lower slopes and foot of the uplands (where distinctive settlements, historic buildings and designed landscapes are present). • Section D: Route D4 is aligned through an area with a rolling landform where sky-lining of towers may be unavoidable. This may increase intrusion and adverse effects on landscape character and careful design will be necessary. Route D5 lies closer to the upland edge and is likely to be more intrusive than D4 due to its potential effects on the perception of the vertical scale and character of this prominent scarp and the smaller hills which lie at the foot of the uplands. Cumulative effects on landscape character are also likely to occur due to the concentration of large-scale infrastructure developments in existence and proposed in the Fetteresso Forest area and the design of the proposal should aim to minimise these and provide appropriate mitigation and wider landscape enhancement as compensation. • Section E: The crossing of the Dee, which is likely to involve the removal of woodland and the introduction of large towers, causes most concern in this section of the route. Potential effects on the special qualities of the Dee Valley SLA will need to be fully considered in the detailed design of the proposal and mitigation measures should be robustly investigated including potential undergrounding of the line to avoid the most significant adverse effects. • Section F: The effects of the proposal on the Dunecht Inventory listed Garden and Designed Landscape and on the character of the smaller scale rolling landform and diverse landcover pattern of the wider Dunecht/Barmekin Hill area. Careful route alignment and thorough exploration of mitigation measures will be necessary to minimise effects on landscape character (see also mitigation measures under 'visual' topic below).	parking during the construction phase. The CTMP will require approval from Transport Scotland and the local authorities. We will undertake specific liaison with Transport Scotland and Local Authority Roads Departments as the project develops to agree measures for public road improvements, temporary traffic management and other mitigation that may be required. A range of measures can be undertaken to reduce traffic impacts. In local communities these can include avoiding deliveries at peak travel times for local commuting; route planning to avoid schools, shopping areas, community hubs; and implementing public road improvement works (e.g. widening roads, strengthening bridges, repairing road surfaces). We would apply for road closures only as needed and through our community liaison team, we will monitor any traffic concerns from local communities and act to resolve them. Core paths and Rights of Way have been considered in the appraisal work to date and will continue to be taken into consideration. All details will be passed on to the project EIA team. 7 We note SEPA's requirements to use their Future Flood Maps extents and will endeavour to adhere to their guidance and NPF4 policy in liaison with SEPA. As part of the EIA a Drainage Impact Assessment (DIA) and / or a Flood Risk Assessment (FRA) will be undertaken in liaison with SEPA.

Organisation	Statutory Consultee Feedback	Our Response
		We note SEPA's comments regarding potential geomorphic risk and their identified areas for riparian planting and improvement. SEPA's comments on the Route Sections are set out in **Tables 3.5 and 3.6**. All details will be passed on to the project EIA team.
	Visual Impact Key visual issues that need to be addressed in the detailed design and mitigation of the proposal are set out for each section of the route below: • Section C: Significant effects on views from roads, paths and residential properties are likely to occur and planting of woodlands and hedgerows/tree lines on surrounding farmland should be considered to help provide screening and mitigate some of these effects. • Section D: The rolling landform in the northern part of this route section may increase intrusion of towers and careful design will be needed to minimise effects on views from roads, paths, the railway line and residential properties. Off-site mitigation should also be considered as above. • Section E: A key concern is the crossing of the River Dee and the potentially significant effects which may occur on people using recreational routes within the valley. Careful routeing of the line will be necessary with the size of towers minimised where possible. Thorough investigation of a full range of potential mitigation measures should also be undertaken including the retention of vegetation, new planting and also possible undergrounding of the line. • Section F: Significant adverse effects could arise on people using promoted and popular walking routes in the Dunecht area, including on views to and from Barmekin Hill. Careful route alignment and thorough exploration of mitigation measures will be necessary. In terms of general landscape and visual mitigation, it is recommended that planting of trees, woodlands and hedgerows should be undertaken in the broad area of the proposed route of the transmission line to provide additional screening from roads, recreational routes and residential properties in advance of construction of the line. These measures would additionally enhance biodiversity and landscape character. Consideration should be given to undergrounding sections of the line to minimise effects on the most sensitive landscape and visual interests.	8 From extensive work completed already, we are aware of the large number and variety of cultural heritage designations or assets within the proposed route options. This includes a number of nationally important cultural heritage designations such as Listed Buildings, Conservation Areas, Scheduled Monuments and Garden and Designed Landscapes (GDL). The route option assessments undertaken to date has considered these key constraints and avoided designated sites where possible. The consultation process has provided a wealth of detailed national, regional and local information which will be included at the next stage of the project as the OHL alignment is designed so that areas of cultural heritage (including for some sites their locality or setting) are avoided as far as possible. We note the comments provided and we will continue to liaise with statutory and non-statutory consultees (including HES and the local authorities) through the next stage of the project which will involve cultural heritage specialists
	5 Amenity	
	Contaminated Land	

Organisation	Statutory Consultee Feedback	Our Response
	Though the proposals are for an overhead power line, the transmission towers, any associated ground-based structures and those parts where the line runs underground have the potential to be built on land contaminated by previous site uses. Outwith risk to construction workers, risk arising to the proposals from contaminated land is likely to be low and limited to interaction with the construction materials. Though for ground-based structures in which workers are expected to work for repeatedly and for some time will need to be risk assessed. Within the Aberdeenshire part of the site boundary, there are over 110 potentially contaminated land sites within the site boundary. Of these PCL sites the following are of note in respect of the proposals: • Former railway land crosses the site. • There are two former RAF airfields (Edzell and Fordoun) intersect the site. • Several satellite bases associated with RAF Fordoun are also present within the site boundary. Should the proposals be the subject of a planning application, or a scoping exercise or environmental impact assessment be carried out contamination issues will require assessment.	considering the scope of the EIA in terms of further cultural heritage surveys. We note the legislative requirements regarding protected cultural heritage sites. It is also recognised that national and local government planning policy has a number of policy objectives related to avoiding and minimising impacts on cultural heritage assets. The EIA assessment on cultural heritage will be closely aligned with the landscape and visual assessment in terms of character, setting, and reflecting the integrated landscape and cultural heritage importance of GDL designations. The teams involved in these assessments, and others such as the ecology specialists, will work together to understand the overall effect on the environment including cumulative effects, and mitigation measures will be developed by the project's specialists wherever possible. All details will be passed on to the project EIA team. 9 We note NPF4's policy requirements under Policy 11c and 25 for an Economic Statement / Assessment of Economic Need which will be provided along with the Section 37 application to the Energy Consents Unit.
	Waste Management **Forest removal and forest waste** Any route that avoids large scale felling is preferred as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality. If relevant, the submission must include a map with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS.	
	Noise Impacts: construction and operational A Noise Impact Assessment would be required and should form part of the Construction Environmental Management Plan (CEMP). Methodology and noise criteria to be agreed in writing with Environmental Health at Aberdeenshire Council.	
	Construction Impacts A Dust Impact Assessment due to construction works to form part of the CEMP.	
	Impact on Private Water Supplies	

Organisation	Statutory Consultee Feedback	Our Response
	There are a number of private water supplies within the proposed corridor routes. SEPA guidance should be followed to ensure proposals do not adversely affect the private water supplies that arise on or near the proposed sites. Information to be obtained from Environmental Health to ensure that the proposal does not adversely affect any existing private water supplies. Appropriate mitigation to be applied to any supplies found in the vicinity of the site.	
	Borrow Pits It is not clear whether any borrow pits will be required for this proposal. Further information on this should be provided.	
	6 Transportation and Wider Access	
	Abnormal Loads An abnormal loads assessment may be required but this is subject to further information being provided on the final route and the work involved.	
	Transport Assessment Not required.	
	Impact on the Local Road Network Access to the proposal will be via many roads within Aberdeenshire, these roads will have contrasting road makeup and road widths, as part of any subsequent applications full details should be provided of construction traffic to each site from the adjoining trunk road network. Full details should be provided of the following, vehicle types and frequency of the access and egress, junction dimensions, drainage, gradients, materials, swept path analysis, visibility splays, and proposed construction traffic routes. The internal construction traffic route should be detailed from the public road including the turning and passing provisions.	
	Impact on the Truck Road Network and Transport Scotland Potential impacts not known at this stage.	
	Impacts on Public Access Potential impacts not known at this stage. More detail required on specific locations.	
	Core paths and Rights of Way	

Organisation	Statutory Consultee Feedback	Our Response
	There is the potential to impact on the Core Path Network at Echt in particular, also Deeside Way and proposed path at Dunecht. Potential to impact core path network around Auchenblae and various other access routes through forestry to be considered.	
	Construction Impacts Full details of how the construction traffic interaction with the existing public roads will be managed, passing provision, visibility windows, road widening, and any associated improvements should be provided. An appraisal of the roads from the trunk road network will also be required as part of any future applications.	
	Parking Parking will be required within each site as appropriate during the construction period, following delivery parking provision will be required in perpetuity for operation and maintenance as appropriate to the specific piece of infrastructure. This information should be detailed as part of any formal Planning application.	
	7 Water Environment	
	Flood Risk SEPA highlights the applicant should use the SEPA Future Flood Maps extents rather than referring to 'High', 'Medium', 'Low' events on their constraints maps to be compliant with NPF4. Any future planning application must demonstrate compliance with NPF4 Policy 22. SEPA is likely to request a planning condition for storage of materials and construction compounds to be located outwith the future flood extent. Compensatory storage may be required for any landraising associated with essential infrastructure such as pylon platforms within the flood extent. In terms of flood risk, SEPA has highlighted the following: • Route F - the future flood extent associated with the River Dee is potentially over 350 m wide at this location. This will need careful consideration in terms of infrastructure location and access if this route is taken forward. • Route D4 - the future flood extent associated with the Luther Water and its tributaries southwest of Fordoun House is complex and potentially over 600 m wide. This will need careful consideration in terms of infrastructure location and access if this route is taken forward.	

Organisation	Statutory Consultee Feedback	Our Response
	Drainage Developers will need to provide a DIA for areas which are at high risk of flooding or areas which may result in increased flood risk for nearby properties. However, if the DIA does not adequately address the risk of overland flow routes, then an FRA may be requested.	
	Protection of the Water Environment SEPA have identified potential Geomorphic Risk along the Bervie Water and Cowie Water and recommend a 20 m buffer minimum on each side of this watercourse. Further geomorphic studies may be advisable for this crossing to ensure long term viability of the infrastructure if close to this buffer. SEPA have identified potential Geomorphic Risk along the River Dee and recommend a 160 m buffer minimum on each side of this watercourse. Further geomorphic studies may be advisable for this crossing to ensure long term viability of the infrastructure if close to this buffer. The Bervie Water, Cowie Water, Luther Water and River Dee have been identified as High priority for Riparian planting. SEPA would welcome the investigation into providing riparian planting along these watercourses in the biodiversity net gain opportunities for this development.	
	8 Built and Cultural Heritage	
	Impact on historic environment Setting is important in the way historic and cultural assets are experienced, appreciated and understood. The planning service has a duty to consider the setting of conservation areas, gardens and designed landscapes and listed buildings when assessing the potential impact of development. The overriding premise is to ensure that any proposal does not undermine important views to and from the historic asset or impact negatively on their immediate surroundings. Having studied the corridor appraisal I can confirm that the main factors relevant to built heritage have been suitably researched and considered by desk-based assessment. The comments provided at this stage are by no means exhaustive and relate only to the information provided and the discussions undertaken at the above meeting.	

Organisation	Statutory Consultee Feedback	Our Response
	The following guidance from Historic Environment Scotland: Managing Change in the Historic Environment Setting - should be used to aid the identification and assessment of setting impacts along the proposed route. https://www.historicenvironment.scot/archives-andresearch/publications/publication/?publicationId=80b7c0a0-584b-4625-1fda60b009c2549 We would ask that all historic assets within a 5 km search area of the proposed alignment route be considered. Given the nature of the development it is critical that the exact locations of the pylon structures are identified, this is essential for considering required viewpoints. Mitigation must be included where there is the potential for impact on setting. Clear methodology and conclusions within the scoping report must be provided, including the rational for dismissing what may appear to be more appropriate solutions, for example grounding areas of cabling. It is extremely important that viewpoints and photomontages demonstrating the impact of the proposed development on the historic assets show the historic assets in the context of the proposed development. Not simply views to and from it e.g. does the proposed development impact negatively on a key viewpoint to the historic asset or does the scale of development undermine the prominence of the historic asset. Direct impacts on a historic asset must be avoided. Moving forward with the proposal I would wish to note that all listed structures should be given equal consideration and not just the Category A listed buildings. **Conservation Area** There will be several conservation areas which may be impacted upon by the development, they include Garlogie, Kirkton of Fetteresso and Auchenblae.	

Organisation	Statutory Consultee Feedback	Our Response
	Given the indicative nature of the proposal a setting assessment should be carried out to identify any setting impacts on the conservation areas identified. This should include viewpoints looking from the conservation areas out towards the development as well as from the development to the conservation areas. It should also consider individual listed buildings within the conservation area as detailed in the previous Topic. Kirkton of Fetteresso and Auchenblae both have supporting information accessible on the Aberdeenshire Council website. http://publications.aberdeenshire.gov.uk/dataset/conservation-areas **Garden and Designed Landscapes** The following garden and designed landscapes (GDLs) fall within close proximity of the proposed route - Castle Fraser, Dunecht House, Drum Castle, Park House, Glenbervie House and Fasque House. Given the indicative nature of the proposal a setting assessment should be carried out to identify any setting impacts on the GDLs identified. This should include viewpoints looking from the GDLs out towards the development as well as from the development to the GDLs. It should also consider individual listed buildings within the GDLs as detailed in the previous Topic. https://www.historicenvironment.scot/archives-andresearch/publications/publication/?publicationId=83214207-c4e7-4f80-af87-a678009820b9 The Council are aware that Historic Environment Scotland has provided advice direct to SSEN Transmission and so the information provided will not be repeated here.	
	Impact on cultural heritage A Cultural Heritage Assessment of the proposed route should be undertaken in advance of a full application. The limited information provided to date does not allow an assess of the proposals for potential historic environment impacts. Advice on appropriate archaeological mitigation will be provided but is dependent on the results of the Cultural Heritage Assessment and the provision of more detailed information about the nature and extent of proposed works. It is also recommended that public benefit opportunities linked to proposed archaeological works are factored in, in line with NPF 4 policies.	

Organisation	Statutory Consultee Feedback	Our Response
	9 <u>Economic</u> Economic Statement/Assessment of Economic Need should be included within any formal submission in accordance with Policy 11c (Energy) and Policy 25 (Community Wealth Building) of NPF4.	
Angus Council	No response.	
Dundee City Council	No response.	
Historic Environment Scotland (HES)	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 Aberdeenshire Council and Angus Council's archaeology and conservation services for matters including unscheduled archaeology and category B and C-listed buildings. <u>Section D – Laurencekirk to Hurlie Substation</u> **Scheduled Monuments** Both routes have the potential for impacts on scheduled monuments. However, providing that direct/ physical impacts are avoided, neither appear to raise issues of national interest based on the current information. *Droop Hill, cairns 1250 m SW of Inches (SM4778)* The monument comprises a group of at least 30 well preserved clearance cairns on the summit of Droop Hill. This location on elevated ground affords good outwards views in most directions. There is some existing development in the vicinity including a large OHL to the west and some wind turbines to the north-east. As the monument is located within the route option, direct/physical impacts must be avoided in line with national policy. Scheduled monuments are legally protected sites under the Ancient Monuments and Archaeological Areas Act 1979. Most works within the scheduled area of a monument requires scheduled monument consent (SMC), obtained in advance through Historic Environment Scotland. Based on the current information, it is unlikely that SMC would be granted for any works to the monument that are associated with this scheme. Should the development be permitted, we advise that all contractors working at the site are made aware of the extent of the legally	This information has been passed to our relevant project teams and will be used to inform ongoing project development, with the points raised taken on board and further detailed appraisals undertaken to inform HES's understanding of the impacts. Please refer to the response provided in **Table 3.3 Environmental Impact** under **Cultural Heritage**. In addition, HES' comments on the Route Sections are noted and are summarised in **Tables 3.5 and 3.6**. See also our response to Aberdeenshire Council's comments regarding cultural heritage above.

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	protected scheduled area. Therefore, as well as this being marked on a map, the scheduled area should also be marked out on the ground by some form of freestanding temporary fencing with an appropriate buffer around it around this to avoid any inadvertent damage to the scheduled area of the monument. The extent of this is marked in red in a map from the relevant scheduled document which is available here: https://portal.historicenvironment.scot/designation/SM4778 There is likely to be an impact on the setting of the monument due to the proximity of the route. As the main relationship appears to be between the monument and the Bervie Valley to the south, we welcome that mitigation to reduce this is being considered by keeping the alignment to the west of Droop Hill where the existing OHL is located. *Fordoun, homestead moat (SM2231)* The monument comprises a settlement site which is located on flat agricultural ground. There are presently some trees covering the site and a wind turbine is situated to the east. There is likely to be an impact on the setting of the monument due to the proximity of the route being located 250 m to the east. However, as long-distance views do not appear to be a key factor in terms of the setting of the monument, we are broadly content that no mitigation is proposed in this particular case. **Category A Listed Buildings and Inventory Gardens & Designed Landscapes** In principle, we consider that the newly preferred OHL Route Option D4 could be proposed without raising issues of national interest. Route Option D4 passes the western edge of Glenbervie House (GDL00194), unlike the previously preferred southeast route(s). The designation record explains there are no significant views out of the designed landscape, except to the east across the parkland, and we consider that D4 is unlikely to have a greater impact than the previously preferred option. We consider that similar is true of Phesdo House (LB9646). In Appendix A, Table A.1 describes the potential impacts of the OHL on the setting of Glenbervie House (GDL00194). We agree that OHL alignment to the west of Droop Hill could reduce the potential for impacts on views from the designed landscape and would welcome this mitigation.	

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	Route Option D4 is considerably further from Arbuthnott House (LB31 & GDL00016) than the previously preferred route. It is unlikely to have any significant impact on the setting of the A-listed house or the designed landscape, which we welcome. Route Option D5 would be a comparable distance from Phesdo House (LB9646) and Glenbervie House (GDL00194) as Route Option D4 and would likely have a similar impact on these assets. However, it would be significantly closer to Drumtochty Castle (LB9664) and St Palladius Episcopal Church (LB9634). If Route Option D5 is taken forward, the assessment should include these additional two assets.	
	Section E – Hurlie substation to River Dee **Scheduled monuments** Both routes have the potential for impacts on scheduled monuments. However, providing that direct/ physical impacts are avoided, neither appear to raise issues of national interest based on the current information. *Clochanshiels, cairns, houses and field systems (SM4857)* The monument comprises well preserved examples of prehistoric round houses and field systems. It is located on a gentle north facing slope, just north of some commercial forestry plantations and with an existing OHL running north/south to the east. As the monument is located within the route option, direct/physical impacts must be avoided in line with national policy. Scheduled monuments are legally protected sites under the Ancient Monuments and Archaeological Areas Act 1979. Most works within the scheduled area of a monument requires scheduled monument consent, obtained in advance through Historic Environment Scotland. Based on the current information, it is unlikely that SMC would be granted for any works to the monument that are associated with this scheme. Should the development be permitted, we advise that all contractors working at the site are made aware of the extent of the legally protected scheduled area. Therefore, as well as this being marked on a map, the scheduled area should also be marked out on the ground by some form of freestanding temporary fencing with an appropriate buffer around it around this to avoid any inadvertent damage to the scheduled area of the monument. The extent of this is marked in red in a map from the relevant scheduled document which is available here: https://portal.historicenvironment.scot/designation/SM4857	

Organisation	Statutory Consultee Feedback	Our Response
	There is likely to be an impact on the setting of the monument due to the proximity of the route. However, as long-distance views do not appear to be a key factor in terms of the setting of the monument, we are broadly content that no mitigation is proposed in this particular case. *Glenton Hill, house, enclosure and field system (SM4873)* The monument comprises several prehistoric round houses and parts of various overlapping field systems including clearance cairns, lynchets and field banks. It is located on Glenton Hill and there is an existing OHL running north/south through the site. As the monument is located within the route option, direct/physical impacts must be avoided in line with policy. Scheduled monuments are legally protected sites under the Ancient Monuments and Archaeological Areas Act 1979. Most works within the scheduled area of a monument requires scheduled monument consent, obtained in advance through Historic Environment Scotland. Based on the current information, it is unlikely that SMC would be granted for any works to the monument that are associated with this scheme. Should the development be permitted, we advise that all contractors working at the site are made aware of the extent of the legally protected scheduled area. Therefore, as well as this being marked on a map, the scheduled area should also be marked out on the ground by some form of freestanding temporary fencing with an appropriate buffer around it around this to avoid any inadvertent damage to the scheduled area of the monument. The extent of this is marked in red in a map from the relevant scheduled document which is available here: https://portal.historicenvironment.scot/designation/SM4873 There is likely to be an impact on the setting of the monument due to the proximity of the route. However, as long-distance views do not appear to be a key factor in terms of the setting of the monument, we are broadly content that no mitigation is proposed in this particular case. *Cowie Line, pillboxes and anti-tank blocks NE of Whitehill (SM6575)* The monument comprises four sections of this Second World War anti-invasion 'stop-line' dating from 1940. The monument is not within the route but is located just to the north. We note that consideration has not been given in the assessment to the potential	

Organisation	Statutory Consultee Feedback	Our Response
	impact on its setting and any potential mitigation that might be necessary. We would therefore suggest that this potential impact is assessed further. **Category A Listed Buildings and Inventory Gardens and Designed Landscapes** In principle, we consider that the newly preferred OHL Route Option E2 could be proposed without raising issues of national interest. Route Option E2 appears comparable to the previously preferred option with no A-listed buildings or Inventory Garden and Designed Landscapes likely to be significantly affected. Route Option E3 would be closer to Fetteresso Castle Doocot (LB9371). If Route Option E3 is taken forward, the assessment should include the doocot.	
	Section F: new section F1.3 **Scheduled monuments** *Normandykes, Roman camp (SM2478)* The monument comprises a Roman marching camp which is situated on top of the broad hill above the old ford across the River Dee and there are good views from and towards the monument. There is an existing OHL running north-south to the west. As the proposed route would be located just to the south-west, there is likely to be an impact on the setting of the monument. We therefore welcome that mitigation to reduce this is being considered. *Bogton, cairn, field system and trackway 250m NE of (SM7877)* The monument comprises a prehistoric burial cairn, some clearance cairns and a field system. It is located on flat agricultural ground and there is an existing OHL running north-south to the east. As the proposed route would be located just to the south-west, there is likely to be an impact on the setting of the monument. We therefore welcome that mitigation to reduce this is being considered. **Category A Listed Buildings and Inventory Gardens and Designed Landscapes** Our response to the Section F route consultation in February 2024 focused on the supplementary appraisal of Park House (GDL00309) and Dunecht House (GDL00153). We have no additional comments on these designed landscapes at this stage.	

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	We advised assessing Drum Castle (LB3113) and Drum Castle (GDL00141) in our response to the proposed route options in July 2023. Figure 6.3 demonstrates that route option F1.3 could intersect or closely pass the southwest corner of the designed landscape. Appendix C, Table C.1 suggests mitigation could be adopted to ensure that pylons are not in key views to and from it. We would welcome this mitigation and encourage the production of the visualisations we suggested in our response to the associated viewpoint consultation. General Comments Some of the assessments in the appendices refer to planting as screening. If screening provided by forestry is considered as part of an assessment, plans for the forestry should be established by consulting long-term forest plans. Trees may be subject to felling, which affects the level of screening they may provide. We do not generally recommend that forestry is used as screening mitigation. Our Managing Change guidance note on Setting gives advice on vegetation as mitigation on page 12.	
NatureScot (NS)	**1 Protected Areas** There are a number of protected areas that are within or have potential connectivity to the route options. Where alignment is unable to avoid direct or indirect effects on protected areas, we are likely to object if these affects will be adverse and cannot be mitigated satisfactorily. We request that where alignment is unable to avoid protected areas site-specific plans, detailing all aspects of construction, operation, maintenance, and mitigation needed to avoid adverse effects, are produced. Operation and maintenance have the potential to impact on protected areas. For example, ongoing wayleave management can impact habitats and maintenance activity on towers or conductors can damage habitats and cause disturbance to species. A site-specific plan for each affected protected area which spans the lifetime of the infrastructure will ensure that any impact is minimised and helps avoid the risk of compromising the integrity of protected sites in the long-term. The table in the annex to this letter provides advice on individual protected areas. **2 Habitats Regulations Appraisal (HRA)**	1 This information has been passed to our relevant project teams and will be used to inform ongoing project development. Our approach to designated sites and biodiversity is discussed in **Table 3.3 Environmental Impact – Biodiversity, Habitats, Protected Species and Designated Sites.** 2 We will continue to liaise with NatureScot throughout the EIA process and will provide the information requested by NatureScot as part of the consultation process on the EIAR. 3 Peat surveys are being undertaken to inform ongoing project development and will include areas within Sections E and F. It is anticipated that in some locations areas of peat can be over-sailed by the OHL and towers and access tracks can be designed to avoid areas of deep peat, as far as possible. 4 We acknowledge NatureScot's Standing Advice and Enhancing Biodiversity guidance.

Organisation	Statutory Consultee Feedback	Our Response
	In order to carry out an HRA the competent authority must have sufficient details about all aspects of the proposal and how this will be carried out. 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 sources for qualifying interests are: QUIL (Qualifying Interest List) for Special Areas of Conservation (SACs); and Citation for Special Protection Areas (SPAs) (always use the SiteLink version and refer to the covering notes where the citations await revision). Conservation objectives can also 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 recent assessed condition (and, if unfavourable, the reasons for this), and any recommended conservation measures. We 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.	5 Noted. 6 Our approach to compensatory planting and Ancient Woodland is presented in **Table 3.3 Environmental Impact – Biodiversity, Habitats, Protected Species and Designated Sites.** 7 The following papers have been prepared to outline SSEN Transmission's commitment to BNG and biodiversity enhancement: • **Delivering a positive environmental legacy - Biodiversity Net Gain** • **Delivering a positive environmental legacy** We are actively investigating opportunities for biodiversity-led enhancement projects. NatureScot's comments on the Route Options are noted and are summarised in **Tables 3.5 and 3.6**.
	3 Peatland and Carbon-Rich Soils The consultation document states that Section F1.3 includes an area identified on our Carbon and Peatland 2016 map as nationally important peatland. In addition to surveys helping to identify sensitive areas to avoid, there may also be opportunities for peatland restoration as part of the project. A valuable source of information about peatland restoration is the Peatland ACTION project webpage.	
	4 Ecological and ornithological interests not associated with protected areas To help plan for other protected species and wildlife, we have standing advice and guidance on minimising impacts on nature and securing the benefits that nature can provide available online here. In relation to Schedule 1 birds, the EIA should include a full assessment on the impact of the development on the birds in the natural heritage zone (NHZ) including breeding raptor surveys. If construction is being carried out during bird breeding season, pre-construction survey area required to ensure disturbance is avoided. If surveys find active nests of Schedule 1 birds within 500 m of the development, then work within this	

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	area may be restricted until after the breeding season. Scottish Forestry or the North-East Raptor Study Group may also have further information on raptors in the forestry areas.	
	5 Landscape and Visual Interests All updated routes identified are likely to avoid impacts on National Scenic Areas (NSAs) and Wild Land Areas (WLAs). Some of the route options affect Special Landscape Areas (SLAs). NatureScot do not intend to offer advice on the effects on SLAs as the respective local authorities are best placed to comment on these.	
	6 Woodland In terms of the Ancient Woodland Inventory (AWI), the Scottish Government's policy on control of woodland removal should be adhered to. Development should not result in the loss of ancient woodland, or adversely impact upon their ecological condition, directly or indirectly. Opportunities should be taken to deliver enhancement to the woodland and to increase habitat connectivity.	
	7 Biodiversity Enhancement National Planning Framework 4 (NPF4) sets out requirements for development to deliver positive effects, primarily under Policy 3: Biodiversity. This includes restoring degraded habitats and building and strengthening nature networks and the connections between them. Biodiversity enhancement should be an integral part of the project and considered from the outset. We understand SSEN are exploring opportunities for delivering this.	
	Section D (D4 (preferred) and D5) Fowlsheugh SPA is designated for breeding seabirds including herring gull that may forage inland. There is potential connectivity with this route option and the SPA. The route is also within connectivity distance with for foraging geese (15 – 20 km) that could be associated with Montrose Basin SSSI, SPA and Ramsar. Geese surveys will need to be carried out to establish whether there are any feeding concentrations in the area. If there are, we request markers on lines in these areas, as SSEN have detailed in the consultation booklet. Ongoing surveys will enable an assessment of the impact on the integrity of the SPAs and inform the HRA process.	

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	Loch of Lumgair SSSI is in close proximity to Routes E2 and E3. The SSSI is designated for its wet woodland and basin fen. Construction on or near to the SSSI could impact on these habitats and the hydrology that supports them. If for any reason this option is pursued and it is not possible due to other constraints to avoid the SSSI, we would need more detailed information about the routeing and construction of the towers on this site before we are able to offer further comment on the level of impact. Eslie Moss SSSI is within 5km of both route options and is designated for its wetland interest (basin fen). Construction near to the SSSI could impact on its habitats and the hydrology that supports them. If for any reason this option is pursued, and it is not possible due to other constraints to avoid the SSSI we would need more detailed information about the routeing and construction of the towers on this site before we are able to offer further comment on the level of impact.	
	Section E (E2 (preferred) and E3) Fowlsheugh SPA is designated for breeding seabirds including herring gull that may forage inland. There is potential connectivity with this route option and the SPA. Loch of Lumgair SSSI is in proximity to Routes E2 and E3. The SSSI is designated for its wet woodland and basin fen. Construction on or near to the SSSI could impact on these habitats and the hydrology that supports them. If this option is pursued and where it is not possible due to other constraints to avoid the SSSI we would need more detailed information about the routing and construction of the towers on this site before we are able to offer further comment on the level of impact.	
	Section F (F1.3) Route F1.3 crosses the River Dee SAC at Craiglug Wood. Direct and indirect effects could arise during construction and the risk should be addressed through an appropriately prepared method statement which takes account of the need for measures to avoid the risk of harm or disturbance to these species and their habitats from pollution or biodiversity issues. Any temporary infrastructure may also impact the river banks and riparian habitats and so should also be considered. Loch of Park SSSI is in close proximity to Route F1.3. The SSSI is designated for its wet woodland and basin fen. Construction on or near to the SSSI could impact on these habitats and the hydrology that supports them. If for any reason this option is pursued and where it is not possible due to other constraints to avoid the SSSI we would need	

Organisation	Statutory Consultee Feedback	Our Response
	more detailed information about the routing and construction of the towers on this site before we are able to offer further comment on the level of impact. We note that Route Option F1.3 links to Section F2 which allows the OHL to be at a greater distance from the Loch of Skene SPA, SSSI and Ramsar site than the previously preferred route. However, there is still some potential connectivity between Section F and the SPA. SSEN's ornithological survey work in this area will be essential in helping to understand the likely patterns of movements of birds and assessing the risks and impacts on bird populations as a whole. This must inform the decisions made in the next stages about detailed design, alignment and mitigation. It will also inform the HRA process. Old Drum of Wood SSSI is designated for upland woodland oak and wood pasture and parkland. The route is within 500 m of the SSSI and will need to ensure that there are no impacts on the designation, including indirect effects.	
	Designated Sites There are many protected sites that are in proximity from the proposed routes but due to the nature of their interests (primarily birds) may still be impacted by the proposals. These will need to be fully taken into account as alignment decisions and the potential impacts robustly assessed. Where alignment is unable to avoid direct or indirect effects on protected areas we are likely to object if these effects will be adverse and cannot be mitigated satisfactorily. In our previous response to SSEN, we requested that where alignment 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. Operation and maintenance has 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. Section D	

Organisation	Statutory Consultee Feedback	Our Response
	Fowlsheugh SPA is designated for breeding seabirds including herring gull that may forage inland. There is potential connectivity with the route options and the SPA. This Section includes areas of woodland in the Ancient Woodland Inventory. Section E Fowlsheugh SPA is designed for breeding seabirds including herring gull that may forage inland. There is potential connectivity with the route options and the SPA. This Section includes areas of woodland in the Ancient Woodland Inventory. Section F Route F1.3 crosses the River Dee SAC at Craiglug Wood. Direct and indirect effects could arise during construction and the risk should be addressed through an appropriately prepared method statement which takes account of the need for measures to avoid the risk of harm or disturbance to these species and their habitats from pollution or biosecurity issues. Any temporary infrastructure to safely achieve the crossing may also impact on river banks and riparian habitats and should also be considered. Loch of Park SSSI is within 1 km of option F1.3. The SSSI is designated for its wet woodland and basin fen. Construction on or near to the SSSI could impact on these habitats and the hydrology that supports them. If for any reason this option is pursued and where it is not possible due to other constraints to avoid the SSSI we would need more detailed information about the routing and construction of the towers on this site before we are able to offer further comment on the level of impact. Old Wood of Drum SSSI is approx. 400m from option F1.3. This SSSI is designated for its Upland Oak Woodland. This Section includes areas of woodland in the Ancient Woodland Inventory.	
Network Rail	No response.	
Scottish Environment Protection	**1 <u>Pre-app Procedures and Guidance</u>** SEPA directs the applicant to their standard advice – which is available from www.sepa.org.uk/media/594101/sepa-triage-framework-and-standing-advice.pdf. This	1 We note SEPA's general guidance and advice. SEPA's comments on the Route sections are noted and are summarised in **Tables 3.5 and 3.6.**

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Agency (SEPA)	advice covers most of the issues in relation to SEPA's interests for this development and they provide limited site specific advice in this case below. SEPA also directs the applicant to where they can obtain further information and data on the issues highlighted below: www.sepa.org.uk/environment/environmental-data <u>Design – General</u> SEPA have already provided initial comments on various route options for this proposal and attend, when possible, the regular stakeholder group meetings. It notes several new routes are now proposed and the following observations are specific to these. However, detailed, site-specific comments cannot be made until detailed proposals come forward showing location of all proposed temporary and permanent infrastructure. Route D – D4 and D5 • D4 - the future flood extent associated with the Luther Water and its tributaries southwest of Fordoun House is complex and potentially over 600 m wide. This will need careful consideration in terms of infrastructure location and access if this route is taken forward. • D4 –passes through the 1 km search area for Radioactive substances (Radium-226) associated with the historical use of the former airfield at Fordoun (NO 75500 77500). If this remains the case a Phase 1 desk study will be required to be submitted to identify the potential for radioactive contamination within the cable route boundaries and establish whether any further detailed assessment is required. This desktop study should be accompanied by a walk over survey by an experienced practitioner. • A number of PWS appear to be within both corridor routes – SEPA guidance will need to be followed. • SEPA have identified potential Geomorphic Risk along the Bervie Water and recommend a 20 m buffer minimum on each side of this watercourse. Further geomorphic studies may be advisable for this crossing to ensure long term viability of the infrastructure if close to this buffer. • Both the Bervie Water and Luther Water have been identified as High priority for Riparian planting. SEPA would welcome the investigation into providing riparian planting along these watercourses in the biodiversity net gain opportunities for this development. Route E – E2 and E3	We will continue to liaise with SEPA throughout the EIA process and will provide the information requested by SEPA as part of the consultation process on the EIAR. 2 We can confirm that Future Flood Maps have been used in the appraisals and this mapping along with climate change scenarios will be included in any flood risk assessment required in accordance with NPF4 Policy 22. 3 We note the comments about forest removal and waste management. 4 We note the requirements for specialist environmental assessments which will be reviewed and undertaken as required alongside the EIA.

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	• E2 has potentially more impact on carbon rich soils although with careful siting of infrastructure this likely impact could be significantly reduced. • A number of PWS appear to be within both corridor routes – SEPA guidance will need to be followed. • E3 – SEPA have identified potential Geomorphic Risk along the Cowie Water within this route corridor and recommend a 20 m buffer minimum on each side of this watercourse. Further geomorphic studies may be advisable for this crossing to ensure long term viability of the infrastructure if close to this buffer. • The Cowie Water has been identified as High priority for Riparian planting. SEPA would welcome the investigation into providing riparian planting along these watercourses in the biodiversity net gain opportunities for this development. Route F – F1.3 • Flood risk - the future flood extent associated with the River Dee is potentially over 350 m wide at this location. This will need careful consideration in terms of infrastructure location and access if this route is taken forward. • SEPA have identified potential Geomorphic Risk along the River Dee and recommend a 160 m buffer minimum on each side of this watercourse. Further geomorphic studies may be advisable for this crossing to ensure long term viability of the infrastructure if close to this buffer. • Several PWS appear to be within this new corridor route – SEPA guidance will need to be followed. • The River Dee has been identified as High priority for Riparian planting. SEPA would welcome the investigation into providing riparian planting along these watercourses in the biodiversity net gain opportunities for this development.	
	2 <u>Water – Flood Risk</u> SEPA highlights the applicant should use the SEPA Future Flood Maps extents rather than referring to 'High', 'Medium', 'Low' events on their constraints maps to be compliant with NPF4. Any future planning application must demonstrate compliance with NPF4 Policy 22. SEPA is likely to request a planning condition for storage of materials and construction compounds to be located outwith the future flood extent. Compensatory storage may be required for any landraising associated with essential infrastructure such as pylon platforms within the flood extent.	

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	3 <u>Amenity – Waste Management</u> **Forest removal and forest waste** Any route that avoids large scale felling is preferred as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality. If relevant, the submission must include a map with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS. **4 <u>Assessments to be carried out and/or submitted with application</u>** • Contaminated Land Report • Flood Risk Assessment • Peat Management • Private Water Supplies	
Scottish Forestry	No response.	
Scottish Water	<u>Drinking Water Protected Area</u> A review of our records indicates that the proposed activity falls within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. River Dee supplies Mannofield Water Treatment Works (WTW), River Tay supplies Perth WTW and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number 0800 0778 778. Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm. An Annex was provided which includes information on precautions to protect drinking water and Scottish Water assets during development activities.	This information has been passed to our relevant project teams and will be used to inform ongoing project development. We acknowledge the specific mitigation requirements to protect water quality. Our project teams will liaise with Scottish Water as the project develops to identify Scottish Water Assets and to ensure their protection. Scottish Water's comments on the Route Sections are noted.

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	Scottish Water Assets A review of our records indicates that there are Scottish Water assets in the area. F1.3 lies in the Mannofield catchment and passes over many assets including distribution main aqueducts and trunk mains Routes D4, D5, E2 and E3 are mostly out with the catchment or on the border of the catchment and also pass over many assets. The corridor options eventually enter the River Tay catchment affecting Perth WTW and again pass over many assets including raw water main and distribution main. This should be confirmed however through obtaining plans from our Asset Plan Providers. Details of our Asset Plan Providers are included in the SW list of precautions for assets, which can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm. All Scottish Water assets potentially affected by the activity should be identified, with particular consideration being given to access roads and pipe crossings. If necessary, local Scottish Water personnel may be able to visit the site to offer advice. All of Scottish Water's processes, standards and policies in relation to dealing with asset conflicts must be complied with. In the event that asset conflicts are identified then early contact should be made with the Highway Authorities and Utilities Committee (HAUC) at Hauc.diversions@scottishwater.co.uk. All detailed design proposals relating to the protection of Scottish Water's assets should be submitted to the HAUC for review and written acceptance. Works should not take place on site without prior written acceptance by Scottish Water. Scottish Water have produced a list of precautions for a range of activities. The list of precautions for assets details protection measures to be taken if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. The document/s and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm. It should be noted that the proposals will be required to comply with Sewers for Scotland and Water for Scotland 4th Editions 2018, including provision of appropriate clearance distances from Scottish Water assets.	

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Transport Scotland	We understand that the current consultation relates to new route options D4 and D5, E2 and E3, and F1.3. Having reviewed these options, we note that none cross the Trunk Road Network. Instead, the entire route now broadly lies west of the A90(T), following its line from Tealing to Kintore. We would comment, therefore, that any of these options would be acceptable to Transport Scotland in terms of impact on the A90(T). We would, however, state that should any further options be proposed which require a trunk road crossing and/or temporary construction access, we would reiterate our previous comments that these would require to be discussed and agreed with the Area Manager for the route.	Noted.
Community Councils		
Aberlemno & District Community Council	No response.	
Arbuthnott Community Council	No response.	
Brechin Community Council	No response.	
Catterline, Kinneff and Dunnottar Community Council	No response.	
Cluny, Midmar & Monymusk Community Council	No response.	
Crathes Drumoak & Durris Community Council	Crathes, Drumoak & Durris Community Council (CDDCC) objects to the SSEN proposals for the East Coast 400 kV OHL and associated facilities. **1 <u>The Need</u>**	We note the objection from Crathes, Drumoak and Durris Community Council. Feedback from communities is carefully considered at every stage of the project development process and, where possible, acted upon. The concerns raised by

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(excluding the sub-section on Hurlie Substation)	Currently, Scotland's electricity peak demand amounts to approximately 4 GW. National Grid ESO predict that this will increase to around 5GW by 2030 and 7 GW by 2040. The Kintore to Tealing 400 kV OHL is designed to carry 6 GW of power, a scale unprecedented in this country, and with more than 70 GW of planned electricity by 2040, it is clear to see that this new infrastructure is not for the benefit of Scotland. Entrusted to upgrade the UK's electricity transmission in our area, SSEN must finance the appropriate transmission of power, even if that comes at a cost to its shareholders initially. National Grid documents, 'Pathway 2030' and 'Beyond 2040' detail offshore transmission lines to and from Scotland to wind farm installations in the North Sea at various points using HVDC cables. Offshoring the Kintore to Tealing line is the only option to protect; landscape visual impacts, physical and mental health, farming, wildlife and recreation. **2 Alternatives** As we move to an entirely electricity-based economy, we need to do this in a way that does not destroy our rural environment. We cannot support the application of 20th century solutions to a 21st century problem when it means the destruction of our countryside. SSEN have not provided factual assessments of the full costs of alternative methods of transmission, instead they solely present the overground transmission as the only option when underground and offshore routing exist as realistic solutions. When comparing costs of alternative solutions, costings must take into account aesthetic, social, health and environmental costs as well as actual monetary costs. Overhead power transmission lines cause external costs including aesthetic impacts on the landscape. The social benefits of avoiding these negative impacts on the landscape may exceed the costs of burying the lines offshore or onshore as underground cables. Estimates of the aesthetic benefits from burying the power lines have been shown to exceed the associated costs. Impacts of overhead power lines on wildlife and human health make burial of power lines even more attractive. **3 Environmental** Aberdeenshire Council has designated, the Dee Valley, running from Peterculter in the east to Dinnet in the west, as a Special Landscape Area. This includes the River Dee	Crathes Drumoak & Durris Community Council, and the information provided, have been passed to our relevant project teams and will be used to inform ongoing project development. We will continue to provide project updates and information on upcoming consultation events to Crathes, Drumoak and Durris Community Council. 1 Please refer to **Section 3.2 Common Themes – Project Need**, which outlines the need for the project. The following paper has been prepared to provide more information on the need for the Pathway to 2030 Projects, including links to the key source documentation: • **Why the Pathway to 2030 Projects are needed** 2 Please refer to **Section 3.2 Common Themes – Alternatives and Technology Choice**, which discusses alternatives. The following papers have been prepared to explain why we need both onshore and offshore solutions and the difficulties with developing underground 400 kV transmission: • **Why the Pathway to 2030 projects require both onshore and offshore solutions** • **The challenges with undergrounding at 400 kV** 3 Please refer to **Table 3.5** which outlines the assessment of Route F1.3. Please also refer to **Table 3.3 Environmental Impact** for detail on the range of environmental impacts being assessed.

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	and associated landscapes, taking in adjoining hills, riverside towns and villages. It provides people within the area with a fantastic green space, linking the developed areas of Aberdeen to the recreational facilities in Aberdeenshire and the Cairngorms National Park. This area must not be destroyed by industrial construction, such as overhead lines. Put simply, there is no doubt, the construction of a substation, pylons and a new overhead line, will destroy, wildlife habitats, scenic landscapes and the ecosystem. CDDCC found it shocking that conversations with SSEN revealed that no environmental assessments of the revised route F1.3 had been carried out before announcing this as the new preferred route. Yet SSEN were quite happy to state that some reasons for changing it were due to environmental impacts on their previously preferred route. SSEN have informed us that a formal assessment will accompany the planning application, but we find this unacceptable and suggest SSEN have a disregard for the impact it will have on our area. **4 Health** Head of Corporate Affairs at SSEN, states that, "we have not quantified and compared EMF of the new proposed Kintore-Tealing overhead line to our existing infrastructure." The CDDCC unequivocally supports our medical community in believing there should be a full and independent review of all the evidence, particularly regarding the unprecedented size of these pylons; from the perspective of their physical size and the sheer capacity of it. This review must be done as a matter of urgency and shared with the public, owing to the level of concern expressed by those living on or near the proposed route. The Minister of Health states the EMF exposures "should comply with the guidelines"; yet there are no guidelines for power transmission of this size. SSEN's route choice through three neighbouring villages and their three primary schools is utterly incredulous. SSEN acknowledge that the OHL should sit no closer than 250 m from the Primary School in Drumoak, recognising the evidence that illustrates there is a greater risk of childhood leukaemia in children living in close proximity to OHLs. Yet, of the maps that have been seen, shared by landowners, SSEN plan to erect pylons significantly closer than 250 m to residential homes.	4 Please refer to **Section 3.2 Common Themes – Electromagnetic Fields**, and the **Health and Safety** section of **Table 3.3 Environmental Impact** for discussion on health impacts. The following paper has been prepared to explain the effects of EMF and the separation distances we apply: • **EMF Leaflet** 5 Please refer to **Section 3.2 Common Themes – Consultation Process** in this report for discussion of our consultation strategy. The following papers provide more information on our optioneering, assessment and consultation processes and can be accessed via the link below: • **Routeing Overhead Lines** • **How Stakeholder feedback influences our proposals** 6 Please refer to **Section 3.2 Common Themes – Socio-economic Impacts** and **Table 3.4 Economic Impact** for discussion of the impact to Scotland's economy, property and land value, and agriculture. The following papers provide more information our approaches to working with landowners and occupiers and community benefits: • **Delivering legacy benefits through Pathway to 2030 Projects** • **Working with landowners and occupiers**

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	We understand that “Data assessments utilising large meta-analyses of thousands of exposed individuals shows an increased cancer risk of at least 50% for both adults and children living in proximity to high voltage OHL long term. Moreover, the existing data on health implications of living in proximity, long term, to high voltage OHLs does not account for the scale of what SSEN is proposing here, 6 GW; the current proposed to run through these lines is approximately 2 to 4 times larger than that of existing 400 kV lines. The Electromagnetic fields (EMF) that this power line will generate will therefore be 2 to 4 times larger and 2 to 4 times more damaging to the health of the human and animal populations who will be forcibly subjected to it” as described by a group of medical doctors. Construction of this infrastructure will have a negative impact on the mental health of this community; indeed, it is already doing so. People living rurally in open countryside are having to face-up to waking up every morning to look at giant pylons out of their windows. Time spent in the natural world is well known to improve mental health and is even being prescribed by doctors. To then destroy this same natural world with industrial infrastructure will result in many more people suffering mental health problems. **5 <u>Consultation</u>** The community does not Trust SSEN to represent its views fairly or accurately. On a number of occasions at the event on 20 March, SSEN representatives, including the Senior Community Liaison Manager, were heard saying that they thought the mood of the room was 50/50, for and against the proposal. The Community Council hosted a table at that event, and of the circa. 400 attendees, there was almost no support for the current proposal. Questionnaire results, conducted by the Community Council this year illustrate the strength of feeling against the current proposal for the OHL. SSEN has failed to understand what it is to engage our communities in developing their proposal. Instead SSEN has by-passed any meaningful activities that can be construed as cocreation or consultation and moved instead directly to events aiming at telling and selling what they have already decided, which left them desperately defending the indefensible. For example, at the Crathes Drumoak and Durris Community Council Drop in Event with SSEN on 15 February this year, SSEN’s Head of Corporate Affairs stated to a group of attendees, that this is happening whether they like it or not. Similarly, at the consultation event, 20 March this year, SSEN’s Senior Project Manager	

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	informed some local residents that this event was more for information, rather than a consultation. With this phase of consultation now complete, we request that we be informed at the earliest opportunity, of the numbers that attended each event, including the detailed feedback and comments recorded by SSEN. In summary, it is clear to us and our community, that there has been a clear lack of proper consultation on the proposed route F1.3 and this is completely unacceptable. On several occasions SSEN staff have told us, this not a consultation on the corridor, more an opportunity to work with them with regards to pylon alignment. SSEN informed us there were no other corridors that could be considered, without even completing a detailed study of the proposed route. In fact, SSEN have already moved to the next stage of its project, route alignment, issuing planned routes to some landowners on 14 February before SSEN even held any consultation events in the community. Both points bring the entire consultation and the decision-making process of SSEN into question. **6 Community Impact** Throughout the process of 'consultation', SSEN have not provided our community with any quantifiable benefits to their proposals. When asked at the session on 15 February for details of the 9000 jobs being created because of its projects, we were given a very generalised summary of how it would benefit Scotland economically. SSEN also commented that the government was reviewing the potential that there may be some local compensation but were unable to provide any detailed information on it. So, despite going through an apparent consultation process, the majority of the communities impacted can only see the negatives of this project; impacts on the landscape, decreasing asset values, detriments to physical and mental health, farming, wildlife, and recreation. The enormous loss of value to hundreds of individual homeowners, businesses and farmers remains unacknowledged let alone compensated, despite several papers of research being presented to SSEN. It is estimated that individual property values will be reduced by up to 40% for homes near to pylon lines - and render a house unsellable in some cases.	

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	Moreover, it is worth being mindful of the fact that house devaluation estimates to date are based on pylons that will have been significantly smaller in height and carried less power than the pylons that SSEN plan to erect on the Kintore to Tealing line. Therefore, it would be reasonable to assume that there would be an increase in the devaluation of house valuations that exist close to the new pylons, which will be far larger (up to twice in size) carrying significantly more electricity: greater concern for health and visual impact.	
Culter Community Council	No response.	
Echt and Skene Community Council	We note that SSEN's revised routing for the new 400 kV OHL now passes close by the settlements of Lyne of Skene, Dunecht and Echt. On behalf of our communities we object to any proposal for installation of a new 400 kV OHL from Kintore to Tealing regardless of the route chosen. Following the initial public exhibitions of SSEN's proposals held in May 2023 we sought to understand how it had been decided that new transmission capacity was required in North East Scotland, and why a new OHL was selected. Neither SSEN nor National Grid ESO has been willing to provide us with the information to show what alternatives to a new OHL (if any) were considered, and why a subsea alternative is not viable. We were referred by SSEN to the ESO's document titled "Pathway to 2030". This lists only the selected transmission investment options and describes the methodology used for selection but it's clear that the ESO did not, at any point in its evaluation, consult with communities. Although the methodology indicates that there was some consideration of communities, it's wholly unclear what form this took or what factors were actually taken into account. It does appear, however, that no consideration was given to the economic costs borne by property owners along the OHL route, whose property values will be adversely affected and who will receive nothing in compensation. The only compensation will be token amounts paid in accordance with the Electricity Act to those landowners that will ultimately have SSEN's hardware actually sitting on their ground. In terms of economics, the ESO's methodology appears to be based on the estimated reduction in constraint costs paid to renewable generators facilitated by increasing transmission capacity. However, this basis for decision making will likely soon be	We note the objection from Echt and Skene Community Council. Feedback from communities is carefully considered at every stage of the project development process and, where possible, acted upon. The concerns raised by Echt and Skene Community Council, and the information provided, have been passed to our relevant project teams and will be used to inform ongoing project development. We will continue to provide project updates and information on upcoming consultation events to Echt and Skene Community Council. Please refer to **Section 3.2 Common Themes – Project Need** of this report, which outlines the need for the project. The following paper has also been prepared to provide more information on the need for the Pathway to 2030 Projects, including links to the key source documentation: • **Why the Pathway to 2030 Projects are needed** Please refer to **Section 3.2 Common Themes – Alternatives and Technology Choice**, which discusses alternatives. The following papers have been prepared to explain why we need both onshore

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	rendered obsolete by the Review of Electricity Market Arrangements (REMA) commissioned by the UK Government in 2022. The Government wants to reduce costs to consumers by incentivising developers to build generation capacity closer to demand centres, rather than in remote locations such as Scotland. It is signalling that the most likely outcome from REMA will be "locational marginal pricing" (LMP) rather than largescale and costly increases in transmission capacity. LMP will mean that the investment case for all new transmission infrastructure including the new Kintore-Tealing OHL in Aberdeenshire should be re-evaluated by the ESO (or its successor) with constraint costs no longer forming part of the economic case. Our constituents have expressed an overwhelming preference for any new transmission capacity (if required) to be provided by way of an offshore subsea cable rather than putting more OHL infrastructure onshore. They have unaddressed concerns about the impact on their residential amenity, property values and health, which we don't believe SSEN/ESO have adequately accounted for in their analysis. In addition, we are not convinced that the economic case for a new OHL will be sustained in light of REMA and the TKUP project should therefore be reevaluated once the way forward is clear in respect of electricity market reform.	and offshore solutions and the difficulties with developing underground 400 kV transmission. • **Why the Pathway to 2030 projects require both onshore and offshore solutions** • **The challenges with undergrounding at 400 kV** Please refer to **Section 3.2 Common Themes – Socio-economic Impacts** and **Table 3.4 Economic Impact** for discussion of the impact to property and land value. The following papers provide more information our approaches to working with landowners and occupiers and community benefits: • **Delivering legacy benefits through Pathway to 2030 Projects** • **Working with landowners and occupiers**
		We await the outcome of the UK Government review of electricity market arrangements. However, the reform of our market arrangements and the need for infrastructure investment are not mutually exclusive. Ofgem's approval of ASTI investments, including East Coast 400 kV reinforcements, is based on the evidence provided by both Transmission Operators and the National Energy System Operator (NESO) and recognises that we need to make significant improvements to our existing infrastructure if we are to achieve our ambitious climate targets. Please refer to **Section 3.2 Common Themes – Socio-economic Impacts and Electromagnetic Fields,** and **Tables 3.2 and 3.4 Environmental Impact and Economic Impact** for details on Health and Safety and property and land values.

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Elrick Community Council	No response.	
Feughside Community Council	No response.	
Glamis and Area Community Council	It might be prudent to mention that our Council area is within Route A. The Report on Consultation published in December 2023 confirmed the proposed route options to be taken forward to the alignment stage and provided new route options. Within this Report, Route A was one of the few routes that were deemed by SSEN not to require any changes since the first consultation in May 2023. It was not clear to us why Route A was categorised as being an acceptable route therefore not requiring any changes. This lack of clarity remains to this day, despite several of our Councillors having attended the event in Forfar and seeking such clarity. Our Community are realistic that electricity generated in North East Scotland to meet a demand mostly in Southern Scotland and the rest of the UK has to be transported. However they are clear that they are very concerned about these electric lines being close to homes and schools, for the reasons set out below. People support two suggestions for mitigating the impact of transporting this amount of electricity from offshore North Sea wind farms to the South 1. Transport it by under sea cable and not bring it onshore, until close to the customers it is serving. 2. Transport it onshore by OHL's but crucially bury the cables underground where they have to pass within 500 metres of a residential area, a workplace or a school. The standard response from SSEN representatives at this consultation to both of these suggestions was that they are "too expensive." But these assertions have never been supported by evidence; we have not been provided with a comparison of costs. Representatives of SSEN further stated that they are not empowered to consult over whether the electricity is transported sub-sea or underground. They are only empowered to discuss relatively small movements in the location of the pylons and OHLs themselves.	Feedback from communities is carefully considered at every stage of the project development process and, where possible, acted upon. The concerns raised by Glamis and Area Community Council, and the information provided, have been passed to our relevant project teams and will be used to inform ongoing project development. We will continue to provide project updates and information on upcoming consultation events to Glamis and Area Community Council. Please refer to **Table 3.6** which outlines why no changes were proposed to Route A. The background and need for the project are discussed in **Section 3.2 Common Themes – Project Need.** The following paper has been prepared to provide more information on the need for these projects, including links to the key source documentation. • **Why the Pathway to 2030 Projects are needed** The following papers has been prepared to explain why we need both onshore and offshore solutions and the difficulties with developing underground 400 kV transmission.

Organisation	Statutory Consultee Feedback	Our Response
	From this, it is clear that consultation in the true sense of the word has never started, because SSEN are not empowered to consult over the two main suggestions put forward by our community. We do not blame the SSEN staff who have engaged with us. They seem good people trying to do their jobs. But this is a stunning corporate failure. How can we have been allowed to work over the last year with SSEN on suggestions that SSEN are not empowered to take decisions on?	• **Why the Pathway to 2030 projects require both onshore and offshore solutions** • **The challenges with undergrounding at 400 kV** In relation to economic impacts, please refer to **Section 3.2 Common Themes – Socio-economic Impacts** and **Tables 3.2 and 3.4 Environmental Impact and Economic Impact** which discuss health, tourism, business and agriculture and farming. In relation to health impacts, please refer to **Section 3.2 Common Themes –Electromagnetic Fields and Table 3.2 Community Impact.** The following has been prepared to explain the effects of EMF and the separation distances we apply: • **EMF Leaflet**
	Angus's economy depends mainly on tourism and farming. Tourism contributes £240 million to the local economy and supports 3887 FTE jobs, according to the Angus Tourism Strategy. The whole area is populated with historic buildings, whose owners and the community have spent money over the years on protecting. Glamis is the third most visited tourist site in Scotland. This project would damage the tourist appeal of the Vale of Strathmore and the entry to Glamis. Angus is nationally renowned for its potato growing industry and the erection of pylons and OHLs would present a real risk of the spread of disease.	
	Our community is very concerned about the potential health effects of transporting high voltage electricity by overhead lines close to humans, particularly young people. Representatives at the consultation were unable to provide us with any information to reduce the uncertainty of the health risk. We recognise that insufficient research has been carried out into these potential effects. But, as SAGE (UK Department of Health's Scientific Advisory Group for Emergencies) recommended in 2007, there is sufficient uncertainty around the health effects, and sufficiently serious potential outcomes, for the Precautionary Principle to be applied. The inevitable spread of electric and magnetic fields from overhead electricity lines is accepted and mentioned in a document (The UK Energy Networks's Association paper on Electric and Magnetic Fields issued in 2017) given to us by SSEN. We understand from our own sources that the level of spread depends on the volts being transported at any one time. A 400,000 volt (400 kV) overhead line will probably spread 400/500 metres from the line of transportation. This potentially has a damaging health effect on humans, if they live or work within this distance from the electricity line. After about 500 metres the intensity of the electric or magnetic field returns to the background level. There appears to be general acceptance by governments and the electrical industry in Europe that humans staying for a number of hours within 60 metres of a high voltage	

Organisation	Statutory Consultee Feedback	Our Response
	electric line are running a health risk. The World Health Organisation has classified magnetic fields as potentially carcinogenic. It is not clear whether the prevailing wind could spread the contamination, though the University of Bristol Medical School has done some research into this, which appears to suggest that it might. A scientist who specialises in this field, with whom we have consulted, has recommended to us that the safest way to transport high voltages of electricity close to humans is to do so by underground cables. This is compatible with Sea Green agreeing, some three to four years ago, to underground a cable, including around Murroes Primary School, under pressure from Angus Council. If transported by above ground cable, this scientist strongly suggested that the cables must be some 500 metres from homes and workplaces. The Draper Report, published in 2005, found a 70% increase in childhood leukaemia for those living within 60 metres of a 470,000 volt line. It also found a 23% increase in childhood leukaemia amongst those living between 200 and 600 meters from power lines. In 2007, the Westminster Parliament commissioned a Cross Party group to review findings on the health or otherwise of using high voltage overhead power lines close to people. This group's findings reflected what we have written above. The group recommended that there should be a moratorium on building new houses within 60 metres of high voltage overhead lines. The group received evidence from estate agents and house builders who said that houses built within 60 metres of high voltage overhead power lines would probably suffer a 10 to 15% price discount compared with those not close to lines. The building firm Taylor Wimpey gave evidence that they would not build houses within 200 metres of a high voltage overhead line. Also in 2007, SAGE recommended the use of the Precautionary Principle in respect of overhead power lines, as there was such uncertainty as to their health effect on humans. We as members of Glamis and Area Community Council are not scientists and are not experts in the electrical industry. But we do come from a range of professional backgrounds and are aware of a substantial risk when it stares us in the face. SAGE has recommended that the Precautionary Principle be followed. However, in communications with the public, SSEN appears to have hardly mentioned a health risk.	

Organisation	Statutory Consultee Feedback	Our Response
	One of our number specifically asked for a proper health analysis in their submission made in Summer of 2023. But they heard nothing more on this. As a Community Council, we asked for a proper analysis of using underground cables in place of overhead lines when passing close to homes and workplaces. We further asked for a proper analysis of transporting the electricity to the South by sub-sea cable. Recently we were told that these options had never been a part of SSEN's consultation process! So has any consultation with us taken place over the last 12 months?	
Inveresk Community Council	No response.	
Kemnay Community Council	No response.	
Kintore Community Council	No response.	
Kirriemuir Community Council	No response.	
Mearns Community Council	No response.	
St Cyrus Community Council	No response.	
Strathmartine Community Council	No response.	

Organisation	Statutory Consultee Feedback	Our Response
Stonehaven & District Community Council	<u>Stonehaven Future Development</u> We are concerned that the option E3 will substantially limit the ability of Stonehaven to develop as the community may wish. We refer to the figure below that shows the corridor of the existing gas and oil pipelines:  *Figure 2 – Existing oil pipeline corridors – 4 off oil and gas pipelines* Figure 2 shows the corridor of the existing oil pipelines and it is very obvious that the E3 corridor being considered by SSEN effectively butts up to the pipeline corridor. These two corridors together will prevent substantially any future development of the town to the west of the A90. Further, have you considered properly the effect of your construction activities if you were to select corridor E3 and the potential impact that these would have on the oil and gas pipelines? <u>Land Usage</u> The E3 option that you propose passes directly over areas that offer significant recreational use for the community of Stonehaven and the district, including the Hill of Swanley. <u>Visual Impact</u>	Feedback from communities is carefully considered at every stage of the project development process and, where possible, acted upon. The concerns raised by Stonehaven & District Community Council, and the information provided, have been passed to our relevant project teams and will be used to inform ongoing project development. We will continue to provide project updates and information on upcoming consultation events to Stonehaven & District Community Council. Stonehaven & District Community Council's comments on the Route Section are noted and are summarised in **Table 3.5**. The following papers provide information on the benefits the project will bring to local communities' aspects: • **Delivering legacy benefits through Pathway to 2030 Projects** • **Working with landowners and occupiers** The following paper has been prepared to outline SSEN Transmission's commitment to BNG: • **Delivering a positive environmental legacy - Biodiversity Net Gain** • **Delivering a positive environmental legacy** The following papers has been prepared to explain why we need both onshore and offshore solutions and the difficulties with developing underground 400 kV transmission. • **Why the Pathway to 2030 projects require both onshore and offshore solutions**

Organisation	Statutory Consultee Feedback	Our Response
	The selection of the E3 corridor will make the overhead steel towers highly visible from the town. This will impact the aesthetic of the town and stands to impact significantly on the tourist business, which is one of the staples of this community. Choice of Corridors As a community, we would prefer the selection of the E2 corridor significantly over the E3 option. However, given the average height of your towers being 57 m, neither route will avoid impacting the community as a whole and an underground option would be a significant improvement. Impact of the Selection of Overhead Transmission Systems There is real concern on the value and saleability of domestic properties that fall within the vicinity of these overhead transmission systems. There is evidence from property consultants that many homes will lose substantial value from proximity to the overhead transmission system. It is essential that SSEN recognise their accountability in this matter and confirm that they will provide compensation for financial harm to people caused by SSEN project decisions which the affected members of the community cannot impact.	• **The challenges with undergrounding at 400 kV** Stonehaven & District Community Council's comments on the Route Section are noted and are summarised in **Table 3.5**. In due course the preferred route that is taken forward will be subject to a full EIA, and a number of other supporting specialist studies in liaison with the Energy Consents Unit, local authorities, and the environmental regulators. This will include an assessment of impacts on nature conservation and ancient woodland, and mitigation measures.
	There is similar concern that the visual impact of the area around Stonehaven will by damaged significantly by the presence of overhead transmission systems. It needs to be recognised that tourism is a staple industry for Stonehaven and this impact to the attractiveness of the local countryside will affect this business. These issues need to be incorporated into SSEN's decision making process, as they are for any major capital project. Logically, the need to compensate the community from financial loss which is not of their making but arises from decisions made by SSEN needs to be recognised by SSEN and the cost of such compensation built into the capital spending decisions.	
	Undergrounding There is a significant push back on the use of overhead transmission systems as described above. For these reasons a significant part of the community would refer you to adopt the underground systems. Against this, from the perspective of the farmers there are significant advantages in the use of overhead transmission systems:	

Organisation	Statutory Consultee Feedback	Our Response
	• the distance between adjacent overhead steel towers means that relatively few will become obstacles to practical farming and they can be located primarily at field edges • constructing the overhead transmission system creates less disturbance than the underground system both in terms of management and the impact on production. There are a number of concerns for farmers that are detailed in the following paragraphs. However, experience of several underground cable laying operations in Germany, for example, show that with effective construction design and engineering these issues can be minimised. The biggest concern from constructing an underground system would be the unknown impacts on hydrology. A lot of the design would have to be based on assumptions, and there remains concern on the impact on the water table flows and on what the long term impact of digging a deep trench might be. The risk of soil borne diseases probably becomes much more significant during construction due to high numbers of plant operations and the quantity of earth moved. This is an issue for potato farmers in the Mearns for overhead lines but is expected to be much more significant for an underground system. Again strict control of the soils extracted from the various layers during trenching and its return during infill should mitigate this. The next major concern for farmers due to constructing an underground system is the potentially considerable damage to fields, due to both the plant operation resulting in soil compaction and the damage to the field drainage systems which can take 20 years to repair. In addition, the land impacted by construction activities probably will be lost to production for 2 years or longer. The use of temporary trackway and strict control of plant movements should assist in mitigating the risks here. We recognise that to deliver a double three-phase circuit you will need to leave behind 6 off 5 m x 5 m fenced enclosures at each jointing location, typically between 750 m and 1000 m intervals. These remain a better option for the impact on the landscape than your proposed line of pylons of an average height of 57 m. Where they create an issue is when they land in the middle of a field. Then SSEN requirements for access annually would be an issue to a farmer, as inevitably they would want to drive to the joint bays over a field in crop. We recognise that it is unlikely that the jointing locations would fall	

Organisation	Statutory Consultee Feedback	Our Response
	at a field edge unless SSEN was prepared to manufacture cable sections to specific lengths to permit this. One key advantage of the underground system is the reduced need for intervention. We recognise that restoring power in the event of a fault is more complex that it would be for an overhead system, however provided there has been suitable design and specification the probability of a fault occurring with an underground system has to be substantially less than it would be for an overhead system. We have an example of a section 22 kva that has been underground for 60 plus years, running through woodland and garden, which has given only one problem with a tree root and SSE had the technology to pin point the problem within 1 metre and rectify within 24 hours of the fault occurring. With respect to that, we are concerned that the focus on overhead power transmission will result in increased risk of power outage with damage from not only due to wind, snow and ice loading and frost but also metal fatigue and insulator life. With the increasingly stormy weather that we are witnessing, this is expected to become ever more prevalent and will not only increase your operational costs but also will impact the households and businesses that are relying on continuity of your supply. Taking this into consideration, we expect that whole life costs will provide a much closer balance between the overhead systema and the underground system. You advise that inspection of underground cabling is more challenging than for overhead transmission. While this is true, given that you have groups of manholes at every cable joint where you can access the cables for testing, the additional effort would not be significant. We do note that this becomes a problem when the cable joint locations are in the centre of a field of crops as described above. We do not recognise your comment on early deterioration of the cable system, which should be preventable with suitable specification and quality control on the manufacture and installation of the cable being used. Please note that we have oil and gas pipelines running past out town that have been in operation for over 49 years already without deterioration. You address the constraints that undergrounding the transmission system places on land use. Clearly there is a significant impact on the land during construction and we would reasonably expect you to make good and return the land to its original condition after construction is completed. As described above, we have shown you that there are	

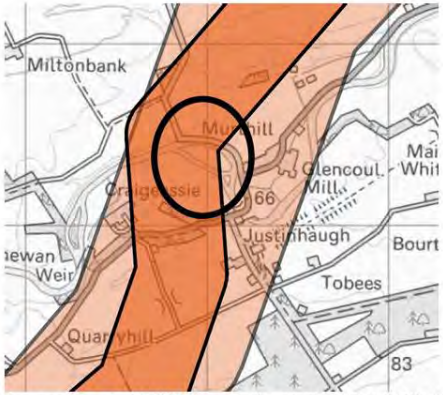
Organisation	Statutory Consultee Feedback	Our Response
	4 oil and gas pipelines running in corridors to the west of the A90. These were installed in co-operation with the landowners and they have been managed with minimum impact on the prime users of the land. There is no reason why a good design of underground cabling should not be able to achieve the same standards. <u>Keeping Close to the Existing Transmission Line</u> Keeping the new line close to and parallel with the existing line keeps the route above most of the best farmland and just below the heather hill so a lot of the line is screened by trees and on a higher contour than 90% of houses. Why would a completely new route be required when there is an existing route corridor. Also if the new line is built adjacent and parallel to the existing then many of the existing access routes to the towers can be used. <u>Preservation of Ancient Woodland</u> We note that the E2 route will pass through a narrow strip of ancient woodland south of the A957 in the vicinity of Mergie. While recognising the need to have one corridor or another, we would expect that, if you elected to follow this corridor, you would accept your responsibility to return the woodland to its current condition, as far as possible, preferably by replanting semi-mature trees and providing the necessary care during their establishment to protect them and give them the best potential to develop. <u>Impact to the Environment and Wildlife</u> We note that you have made significant commitments to restoring the environment following construction and have recognised the presence of important wildlife within this area. We trust that this work will continue for a significant period after the completion of construction and commissioning to ensure that the restored environment thrives.	
Stonehaven & District Community Council – Online Form	We do not consider that we have had a proper consultation for this project. The timing of the project precluded many of the working members of the community from attending and those who did attend found that your personnel were in many cases either unable or unwilling to provide proper answers to their questions. The meeting was arranged at last minute by you on the 11 March, with first notification to our representative at your pre-consultation briefing on 29 February and letters of notification arriving in the houses of the community on 4 March.	We acknowledge the feedback on our consultation process. Please refer to **Section 3.2 Common Themes – Consultation Process** Themes for details and responses on our consultation.

Organisation	Statutory Consultee Feedback	Our Response
	You closed the meeting at 18:00 despite this having been queried in the pre-consultation, which effectively ensured that most working members of the community could not attend. We insist that a proper consultation is organised at a reasonable time and with sufficient notice that the community can attend. We would expect that you would staff this with personnel who are authorised and able to answer all our questions fully. We insist that the date for the end of consultation that you have proposed is put in abeyance until there has been a proper discussion between your team and the Stonehaven community.	The following paper has been prepared to provide more information on the need for these projects, including links to the key source documentation: • **Why the Pathway to 2030 Projects are needed** The following papers have been prepared to explain why we need both onshore and offshore solutions and the difficulties with developing underground 400 kV transmission: • **Why the Pathway to 2030 projects require both onshore and offshore solutions** • **The challenges with undergrounding at 400 kV**
	There is no real explanation of the need for this project. Is the aim for the 400 kV transmission line to transmit power to the Central Belt for consumption there or will it be carrying power for export to England and beyond? Why are there two tie-ins to the subsea systems? Why is there a need to provide an overhead connection to the existing Fiddes substation? Given that the Beyond 2030 document by the National Grid recognises the expectation that electrical power will be consumed by green energy projects in the North of Scotland is this project of true value in the longer term? You have set out to consult on phase 1 of this project, the transmission line and its in-line substations only. It is very clear from your documents and from the National Grid ESO documents that this is, in fact, a much wider project with two additional subsea tie-ins, both of which have stand-alone facilities, a tie-back to the existing substation at Fiddes and a tie-back to the existing substation at Hurlie from the new Glendye development. There is also mention of yet more onshore tie-backs which are not clarified in your consultation. Finally, the Beyond 2030 document by National Grid also shows a second transmission line running in parallel to this one. It is very clear that when the first phase is done the rest will have to follow so it is essential that you consult on the complete project. Consequently, we insist on a proper consultation based on the complete project, not just on the first phase. The total potential project, even from what we can discern at this stage, suggests that there will be a spiders web of overhead cables across the Mearns and around Stonehaven. It is essential that we have clarity on what you propose. The multiple	Please refer to **Section 3.2 Common Themes – Cumulative Impacts** for details and responses on cumulative assessment. In due course the proposed route that is taken forward will be subject to a full EIA which will consider cumulative impacts. The scope of the EIA will be agreed with the Energy Consents Unit following submission of a Scoping Report. The following papers have been prepared to explain our optioneering process and the stages each project goes through: • **Routeing Overhead Lines** • **How Stakeholder feedback influences our proposals** We acknowledge the feedback on our consultation process. Please refer to **Section 3.2 Common Themes – Consultation Process** for details and responses on our consultation.

Organisation	Statutory Consultee Feedback	Our Response
	substation and conversion unit sites will have a significant impact on Fetteresso forest or the area that has not been consulted on or discussed. There has been no adequate explanation of the approach to selecting the new route options. There is no discussion on the reasons for not considering the subsea route as a viable option. The project team need to treat the Stonehaven community with respect and consult with them properly, recognising the impact that the delivery of the project and the completed infrastructure will have on their lives. We need any consultation to be a true dialogue with the shared expectation that the comments made by the community are capable of modifying the project design and execution. Based on what we have been made aware of the community strenuously objects to this project.	
Tealing Community Council	Tealing Community Council on behalf of the residents are not in favour of this project.	The concerns raised by Tealing Community Council, and their objection to the project are noted.

Table B.2 Non-statutory consultee feedback

Organisation	Non-statutory Consultee Feedback	Our Response
Aberdeen and District Soarers	No response.	
Aberdeen Hang-gliding and Paragliding Club	No response.	
British Horse Society	No response.	
BT	For us to assess and investigate this proposal can you please confirm the height and co-ordinates of any new structures. Once we have this, we will be able to comment on the proposal.	Our project team will liaise with BT as the project develops to enable BT to complete an assessment of BT's assets.
Catchment Partnerships	No response.	
Civil Aviation Authority – Airspace	No response.	
Crown Estate Scotland	No response.	
Dee District Salmon Fishery Board (DSFB) (Aberdeenshire)	No response	
Energy Consents Unit (ECU)	No response.	
Esk District Salmon Fisheries Board (EDSFB)	No response.	
Esk Rivers & Fisheries Trust	Having reviewed the most recent proposed route for the 400 kV overhead line, Esk Rivers & Fisheries Trust does not have any issues with the majority of the river and burn crossings, and we look forward to discussing appropriate mitigation and working with SSEN to ensure that the impacts on the waterbodies and the aquatic ecosystems are minimised. We strongly recommend that juvenile salmonid and invertebrate surveys are conducted at all areas where the proposed line interacts	This information has been passed to our relevant project teams and will be used to inform ongoing project development. Esk Rivers & Fisheries Trust's comments on the Route section are noted are being considered further by specialist teams.

Organisation	Non-statutory Consultee Feedback	Our Response
	with rivers and burn pre-, peri-, and post-construction, to determine if any negative impacts occur on the aquatic habitat. However, we do have concerns where the proposed route crosses the River South Esk, at OS NGR 460 574 (see figure below). The area enclosed by the circle contains very good habitat for fish and invertebrates, and we understand there may be a protected species present that NatureScot could confirm. The area around the island contains salmonid spawning habitat, along with important nursery and juvenile salmonid habitat. The river banks, especially the left bank, is well wooded, as are the banks of the island: these trees provide stability to the river banks, minimising erosion and protecting river substrates from fine sediments. Were a substantial number of trees to be removed as a result of the overhead power line, we would be concerned that the river banks would erode, increasing the fine sediment input to the river. The loss of riverside trees may also lead to de-stabilisation of the banks around the island, potentially altering the geomorphology of the area and the loss or degradation of important salmonid spawning, nursery and juvenile habitat.  *Location of proposed crossing of 400kV line over River South Esk SAC. OS NGR NO 460 574.* I hope you will take these issues into account when settling on the final location for the overhead lines. If required, I would be happy to meet SSEN on site to point out important features of the area and discuss potential mitigations.	

Organisation	Non-statutory Consultee Feedback	Our Response
Fisheries Management Scotland	No response.	
John Muir Trust	No response.	
JRC Windfarm	Please can you advise where I might find the pylon positions and heights? We ideally need these to assess this development against any of the links we protect.	Our project team will liaise with JRC Windfarm as the project develops to enable JRC Windfarm to complete an assessment.
Ministry of Defence (MOD)	<u>Low Flying</u> In this case the development falls within Low Flying Area 14 (LFA 14), an area within which military aircraft may conduct low level flight training. The addition of a development featuring tall or narrow profile structures such as electricity towers in this locality has the potential to introduce a physical obstruction to low flying aircraft operating in the area. To address this impact, and given the location and scale of the development, the MOD will require that a condition is added to any consent issued requiring that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. At this consultation stage, where details for the final route, design and/or maximum height of the proposed development have not been determined, MOD representations are limited to the principle of the development only. In summary the MOD has concerns, and should be consulted at all future stages for this proposed development to complete a full detailed safeguarding assessment. The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents titled "Consultation Document – Kintore to Tealing 400 kV Overhead Line" and "Kintore – Tealing Overhead Line 400 kV Booklet" dated February 2024 and March 2024 respectively. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.	This information has been passed to our relevant project teams and will be used to inform ongoing project development. Our project team will liaise with the MOD as the project develops to enable the MOD to complete a detailed safeguarding assessment.

Organisation	Non-statutory Consultee Feedback	Our Response
Mountaineering Scotland	No response.	
National Gas Transmission Plc (National Gas)	National Gas wishes to submit a holding objection in respect of existing gas apparatus and land interests located within the Refined Route Boundary for which it will require appropriate protection including compliance with the relevant standards for works proposed within close proximity of its apparatus to ensure the continued safe operation of the gas transmission network. I have attached an interaction plan which shows where NGT's apparatus interacts with your Refined Route Boundary. Where the Promoter intends to acquire land, utilise land temporarily, extinguish rights, or interfere with any of National Gas's apparatus, it will require appropriate protection and further discussion with the Promoters to fully understand the impact to apparatus and rights. National Gas therefore wishes to protect its position in light of existing infrastructure which is within the proposed Planning Application boundary until an Asset Protection Agreement is in place. National Gas's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in order limits should be maintained at all times and access to inspect such apparatus must not be restricted.	This information has been passed to our relevant project teams and will be used to inform ongoing project development. Our project team will liaise with National Gas Transmission as the project develops to identify National Gas Transmission assets and any required mitigation.
National Grid (Electricity)	No response.	
National Trust for Scotland	While the revised route will still have a visual impact on the area, we do prefer this route to the previous proposals which would have run to the east of Drum Castle, and had a much greater visual impact. The proposed new route apparently commands greater support from the local community and we are supportive of routing that helps address community concerns. However, the route does still come very close to the area in the care of the National Trust for Scotland, and we would greatly appreciate more detailed discussions about siting and view points as the project develops. The new route will also apparently mean the removal of some woodland to the north and west of Drum Castle, and to a less degree to the south. NTS currently manages oak pasture woodland of great significance at the Old Wood of Drum, and we are seeking to extend this type of habitat. Under National Planning Framework 4,	This information has been passed to our relevant project teams and will be used to inform ongoing project development, including our BNG commitments.

Organisation	Non-statutory Consultee Feedback	Our Response
	development proposals are required to “contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them.” We would ask that any loss of natural habitat is fully compensated for.	
NATS Safeguarding	As previously communicated, NATS anticipates no impact from the proposal. While we operate a number of aeronautical radio stations, none of these appear to be located within 2 km of the proposed overhead transmission line in question. Furthermore the NATS installations appear to be on significantly higher ground compared to the proposed infrastructure. However, if a list of coordinates, or kml or shp file were available in order to plot the routes being considered, that would be useful so that we could better gauge distances between our interests, and the various proposals.	Noted.
National Farmers Union (NFU) Scotland	No response	
Office for Nuclear Regulation	With regard to planning application Consultation on SSEN Transmission Proposed Kintore to Tealing, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.	Noted.
River Dee Trust	No response.	
Royal Society for the Protection of Birds (RSPB)	No response.	
Scottish Canoe Association	No response.	
Scottish Rights of Way and Access Society (ScotWays)	No response.	
Scottish Wild Land Group (SWLG)	No response.	
Scottish Wildlife Trust	No response.	
SUSTrans	No response.	

Organisation	Non-statutory Consultee Feedback	Our Response
Tay District Salmon Fisheries Board (TDSFB)	No response.	
Tay Foundation (Fisheries Trust)	No response.	
Visit Scotland	No response.	
Member of Scottish Parliament (MSP) - Angus North and Mearns Constituency	I have been contacted by many constituents across northern Angus and southern Aberdeenshire in response to this project. It is, without doubt, the most contested issue that my office has ever dealt with and I would like to begin by giving an overview of my constituents concerns. I have broken them down into a number of areas and will cover each in turn. Despite the experiences of last year, my constituents still feel that the nature of the consultation process is flawed. They cite difficulties in attending consultation events and there is a call for the consultation period to be extended. The consultation dates were announced at short notice, documents hard to access online with the online website itself very difficult to navigate. After attending the in-person events, many have contacted me to say that they are unhappy with the inability of SSEN Transmission's representatives to satisfactorily answer their questions, particularly highlighting an insufficient explanation of the need for the project in the first instance, a lack of information on costs, the technology employed and how the locations for each stage were chosen. Constituents have also highlighted how the recently published "Beyond 2030" ESO report indicates that there will likely be a new 400 kV line from Peterhead down to Merseyside and have argued that the current consultation should consider all the future infrastructure. It can't be considered 'holistic' if the strategy is released in dribs and drabs. There is also the significant matter of additional necessary infrastructure that is planned but is not discussed in the project documents, for example, extensive battery storage facilities. There is no doubt that the agricultural sector will be greatly affected and I have spoken to farmers and other businesses across my constituency who have raised the same concerns. Time and again I have heard that contractors and sub-contractors are not adhering to biosecurity measures that are essential to their industry, particularly the seed potato sector. It is absolutely crucial that this is done properly to limit the spread of potato cyst nematode and other pathogens from farm to farm. I have been contacted repeatedly about this topic and have been told that little care or	We note the feedback on our consultation process. Please refer to **Section 3.2 Common Themes** for details and responses on the need for the project, consultation and cumulative impacts. We appreciate the concerns raised and the impact poor biosecurity can have on agricultural activities. Strict biosecurity measures will be required of all site staff, including those undertaking pre-construction surveys, enabling and construction work. Soil sampling for both PCN and Clubroot will be carried out before and after both ground investigation works and construction works. We also appreciate the impact the project may have on individual farms that may be affected, liaison with farmers will continue to understand their businesses and how they use their land. We will engage with the mast operators once the towers positions are defined to carry out relevant assessments. This may result in tower repositioning as it is the towers that can cause interference rather than the conductors. Our experience is that mitigation to avoid interference will be achievable. Regarding queries on whether farm technology, and specifically GPS equipment would be affected by OHLs, we have not received complaints to this effect

Organisation	Non-statutory Consultee Feedback	Our Response
	biosecurity measures are being carried out. There is also concern about potential restrictions to the irrigation of crops, which may make potato and vegetable production unviable in some areas. The scope of this project is vast compared to normal development in this area and there is a concern about the loss of prime agricultural land both under the overhead lines and also at the substations and associated battery storage facilities. Farmers and individuals have also spoken about the effect that the infrastructure will have on GPS and mobile phone signals, arguing that this will have a negative impact on farm machinery that depend on GPS and also householders and businesses who cannot depend on landline technology in remote areas. Much is made on the project documentation regarding a net biodiversity gain indeed it states in the Overhead Routing and Site Selection Consultation Booklet that SSEN "will leave the environment in a measurably better state than before development started". My constituents question how this is even possible given that "net biodiversity gain" does not make up for the destruction of individual habitats. They point to the installation of large concrete bases for the pylons and question how construction of these will affect soil structure and the ubiquitous watercourses that are adjacent to the pylons along their route. They also point to the impact on migratory birds such as the many thousands of geese that flock here in the winter and the wader species that move from the moorland down on to the fields. Wader species are already struggling, many are now amber and red listed species. They can ill afford an additional challenge to their survival. Individually, my constituents have expressed their fears about the potential damage to health, their mental health and the wellbeing of people living and working near overhead lines and substations. There are still concerns about the health and safety of electricity transmission infrastructure and the potential of childhood leukaemia. Many have spoken of their life plans being thrown into disarray because of the effect of the proximity of pylons on the value of their homes. Those approaching retirement who may have planned to downsize, have now been disrupted again, having a knock-on impact on their mental health and wellbeing. Most of all, my constituents have pointed to the destruction to the beauty of the current landscape and how the project will negatively affect the amenity that they,	related to the existing network and understand it is not an issue for current farm operations that occur under and adjacent to our infrastructure. In due course the proposed route that is taken forward will be subject to a full EIA which will consider the likely impacts on landscape and amenity together with many other aspects. Mitigation measures will be set out, as required, to avoid, minimise or offset significant adverse effects. As required, the project will deliver BNG, and the following papers have been prepared to outline SSEN Transmission's commitment to BNG: • **Delivering a positive environmental legacy - Biodiversity Net Gain** • **Delivering a positive environmental legacy** All required environmental consents will be sought in line with current legislation. Species Protection Plans (SPPs) will be agreed with NatureScot for all key protected species which have the potential to be adversely affected by the proposals. Please refer to **Section 3.2 Common Themes – Electromagnetic Fields and Table 3.2 Community Impact – Health and Safety** for discussion on health impacts. The following paper has been prepared to explain the effects of EMF and the separation distances we apply: • **EMF Leaflet** As a regulated business, we are obliged to follow a statutory legal framework under the Electricity Act 1989 and Land Compensation Act 1961. If property owners are entitled to compensation under the legal

Organisation	Non-statutory Consultee Feedback	Our Response
	and many others, enjoy. There appears to be no thought given to the visual impact that the larger than normal pylons will have on residents across my constituency. Ultimately, there is an increasing demand for offshore generated electricity. That is not in dispute. What is most upsetting is the manner in which these decisions have been made and the lack of thought that has gone into reducing the impact on those whom it will affect the most.	framework, we will assess any claim on a case-by-case basis under the direction of this legal framework. Please refer to **Common Themes** in **Section 3.2 – Socio-economic Impacts** and to the following papers which provide more information on these aspects: • **Delivering legacy benefits through Pathway to 2030 Projects** • **Working with landowners and occupiers** In due course the proposed route that is taken forward will be subject to a full EIA which will consider the likely impacts on landscape and amenity together with many other aspects. Mitigation measures will be set out, as required, to avoid, minimise or offset significant adverse effects. The following paper has been prepared to provide more information on the need for these projects, including links to the key source documentation: **Why the Pathway to 2030 Projects are needed**

Appendix C – Figures

Figures showing Route Options as of March 2024 (Figures 1.1 and 1.2) and Options Being Taken Forward to Alignment (Figure 4.1)

Scottish & Southern Electricity Networks

TRANSMISSION

LUC

Kintore

F2

F1.3

E1

E2

E3

Hurlie

D5

D4

C1

B1.1

A1

Emmock

ABERDEEN

BANCHORY

Peterculter

STONEHAVEN

BRECHIN

MONTROSE

ARBROATH

FORFAR

KIRRIEMUIR

BALLATER

Braemar

BLAIRGOWRIE AND RATTRAY

COUPAR ANGUS

MOUNT KEEN

LOCHNAGAR

THE MOUNTH

FOREST OF ALYTH

Scale @ A3: id 1:300,000

0 2.5 5 10 km

320 000m.E

740 000m.N

Proposed Routes (November 2023)

- A1
- B1.1
- C1
- E1
- F2

New Route Options (March 2024)

- D5
- D4
- E2
- E3
- F1.3

Substations

- Existing Kintore substation
- Proposed Hurlie substation
- Proposed Emmock substation

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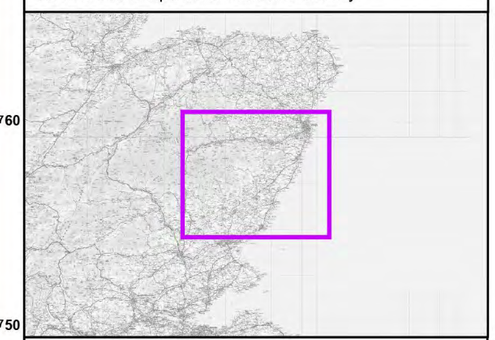


Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title:

Proposed Routes and New Route Options (as of March 2024)

Drawn by: HW

Date: 29/07/2024

Figure: 1.1

Scottish & Southern Electricity Networks

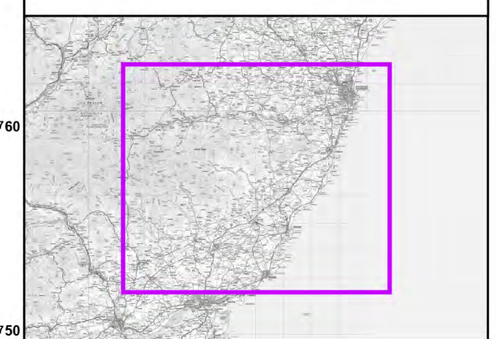
TRANSMISSION

LUC

Refined Route
- A1
- B1.1
- C1
- E1
- F2

Proposed Route
- A1
- B1.1
- C1
- E1
- F2

New Route Option
- D4
- D5
- E2
- E3
- F1.3



Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title:

Refined Routes (as of March 2024)

Drawn by: HW

Date: 09/08/2024

Figure: 1.2

Scottish & Southern Electricity Networks
TRANSMISSION

LUC

Proposed route widened to the east at Echt to allow alignment options to move further from property constraints.

Proposed route widened to the east at Schoolhill to allow for further alignment options that will increase distance from areas of flooding and residential properties.

Proposed route widened to the west at Schoolhill to provide alignment options that will increase distance from areas of flooding and residential properties.

Proposed route widened at Careston to provide alignment options that consider stakeholder feedback to increase distance from residential properties as well as land use and environmental constraints.

Proposed route at Justinhaugh widened to provide flexibility for alignment options in the vicinity of the crossing of the River South Esk.

Proposed route at Padanaram widened to achieve a further distance from residential properties.

Proposed route at Careston widened to allow flexibility for alignment options in the vicinity of the Noran Water residential properties and cultural heritage sites.

Kintore
Hurlie
Emmock
F2
F1.3
F3
E4
E1
E2
D4
C1
B1.1
A1

Scale @ A3: id 1:300,000
0 2.5 5 10 km

320 000m.E 330 340 350 360 370 380 390 400
810 800 790 780 770 760 750 740 000m.N

Proposed Route

- A1
- B1.1
- C1
- D4
- E1
- E2
- F1.3
- F2

Refined Route*

- A1
- B1.1
- C1
- E1
- F2

Additional options (identified following March 2024 consultation)

- E4
- F3
- Route section divider

Substations

- Existing Kintore substation
- Proposed Hurlie substation
- Proposed Emmock substation

*Refined routes are approximately 500m wide, within which we aim to identify an optimal alignment for the OHL

OS base maps are the latest available version from Ordnance Survey, dated July 2024. SSEN Transmission take no responsibility for the release or accuracy of latest version Basemaps from Ordnance Survey.

Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title:

Options being taken forward to alignment August 2024

Drawn by: HW

Date: 14/08/2024

Figure: 4.1

Figures showing Route Options Being Taken Forward to Alignment

(Figures C1.1 to C6.2)

Scottish & Southern Electricity Networks

TRANSMISSION

LUC

340

750

B1.1

A1

Scale @ A3: 1:52,000

0 1.25 2.5 5 km

340 000m.E

740 000m.N

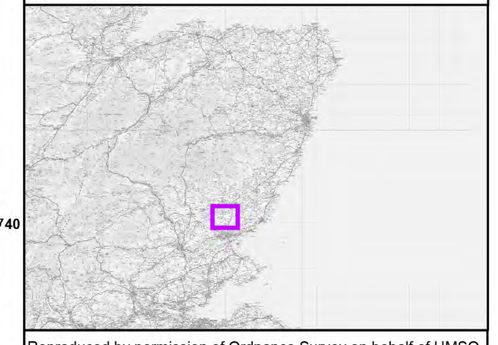
Proposed Route

- A1
- B1.1
- Route section divider

Substation

- Emmock substation Proposal of Application Notice boundary (Angus Council reference 24/00058/PAN)

OS base maps are the latest available version from Ordnance Survey, dated July 2024. SSEN Transmission take no responsibility for the release or accuracy of latest version Basemaps from Ordnance Survey.



Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

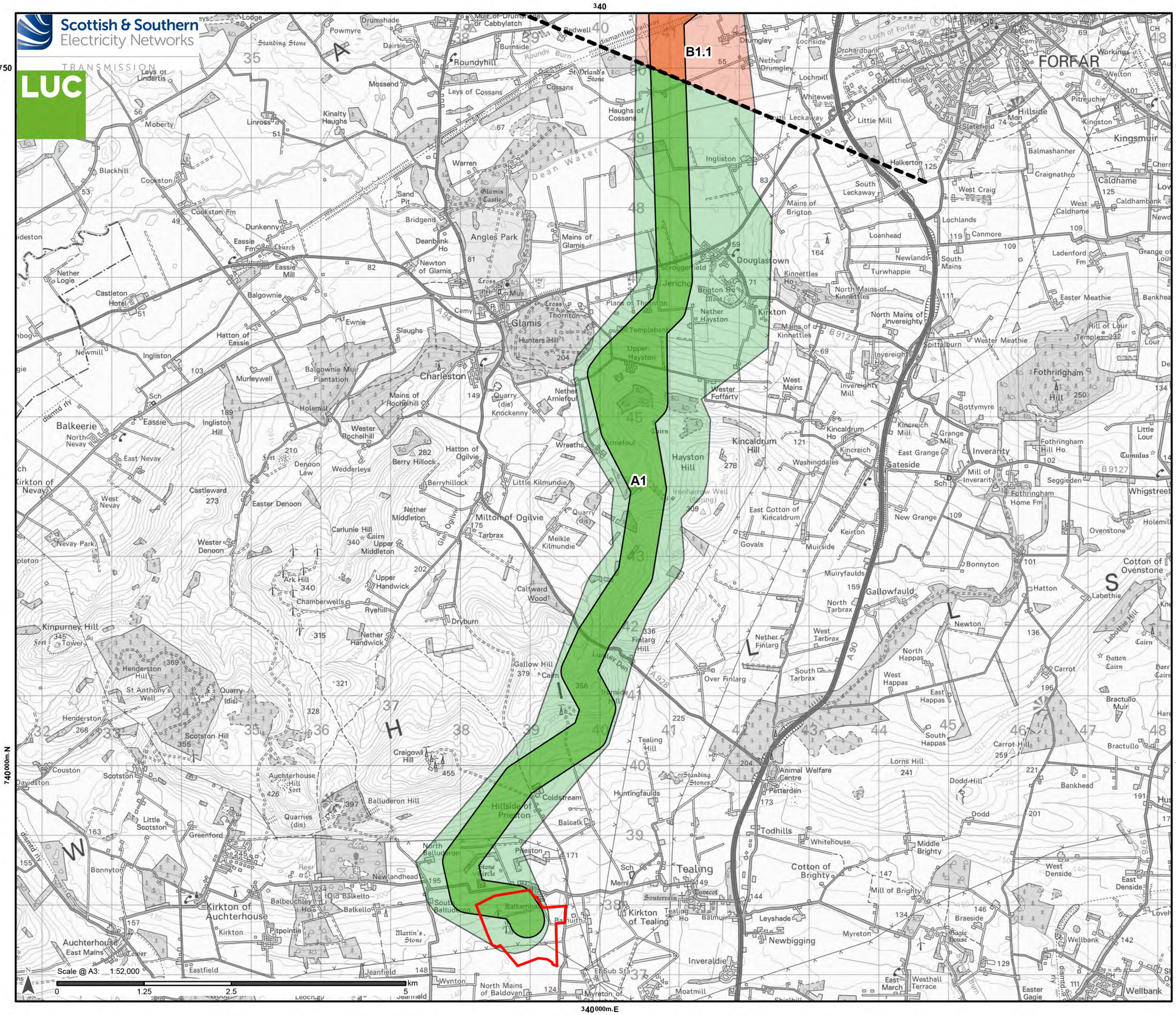
Title:

Proposed Route August 2024 - Section A

Drawn by: HW

Date: 14/08/2024

Figure: C1.1



Proposed Route

- A1
- B1.1

Refined Route*

- A1
- B1.1

Route section divider

Substation

Emmock substation Proposal of Application Notice boundary (Angus Council reference 24/00058/PAN)

*Refined routes are approximately 500m wide, within which we aim to identify an optimal alignment for the OHL

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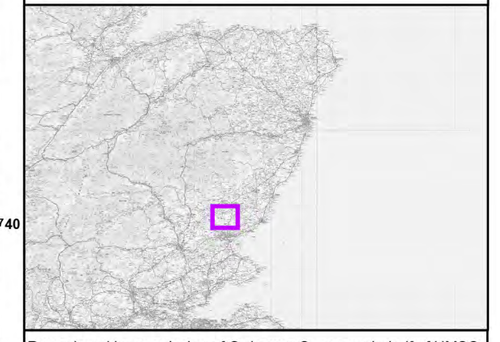

Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title:

Routes being taken forward to Alignment, August 2024 Section A

Drawn by: HW

Date: 15/08/2024

Figure: C1.2

Scottish & Southern Electricity Networks

TRANSMISSION

LUC

Proposed route widened at Careston to provide alignment options that consider stakeholder feedback to increase distance from residential properties as well as land use and environmental constraints.

Proposed route at Careston widened to allow flexibility for alignment options in the vicinity of the Noran Water residential properties and cultural heritage sites.

Proposed route at Justinhaugh widened to provide flexibility for alignment options in the vicinity of the crossing of the River South Esk.

Proposed route at Padanaram widened to achieve a further distance from residential properties.

B1.1

C1

A1

Scale @ A3: 1:56,000

0 1.25 2.5 5 km

340000m.E

350

750000m.N

760

Proposed Route

- A1
- B1.1
- C1
- Route section divider

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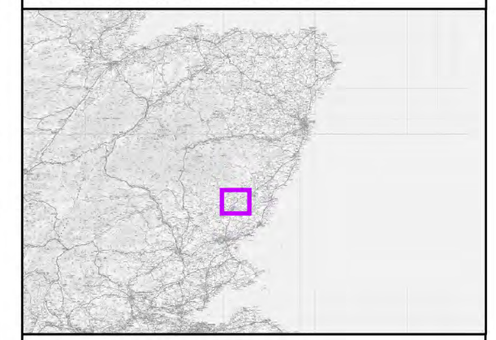


Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title: Proposed Route August 2024 - Section B

Drawn by: HW

Date: 14/08/2024

Figure: C2.1

Scottish & Southern Electricity Networks

TRANSMISSION

LUC

Proposed route widened at Careston to provide alignment options that consider stakeholder feedback to increase distance from residential properties as well as land use and environmental constraints.

Proposed route at Careston widened to allow flexibility for alignment options in the vicinity of the Noran Water residential properties and cultural heritage sites.

Proposed route at Justinhaugh widened to provide flexibility for alignment options in the vicinity of the crossing of the River South Esk.

Proposed route at Padanaram widened to achieve a further distance from residential properties.

B1.1

C1

A1

Scale @ A3: 1:56,000

0 1.25 2.5 5 km

340000m.E

350

750000m.N

750

Proposed Route

- A1
- B1.1
- C1

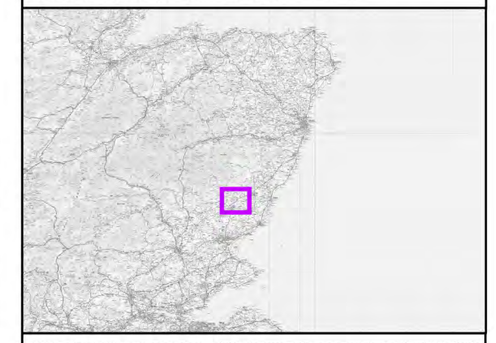
Refined Route*

- A1
- B1.1
- C1

Route section divider

*Refined routes are approximately 500m wide, within which we aim to identify an optimal alignment for the OHL

OS base maps are the latest available version from Ordnance Survey, dated July 2024. SSEN Transmission take no responsibility for the release or accuracy of latest version Basemaps from Ordnance Survey.



Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title:

Routes being taken forward to Alignment, August 2024
Section B

Drawn by: HW

Date: 15/08/2024

Figure: C2.2

Scottish & Southern Electricity Networks

TRANSMISSION

LUC

360

370

770000m.N

770

B1.1

C1

D4

Scale @ A3: 1:50,000

0 1.25 2.5 5 km

360000m.E

370

Proposed Route

- B1.1
- C1
- D4
- Route section divider

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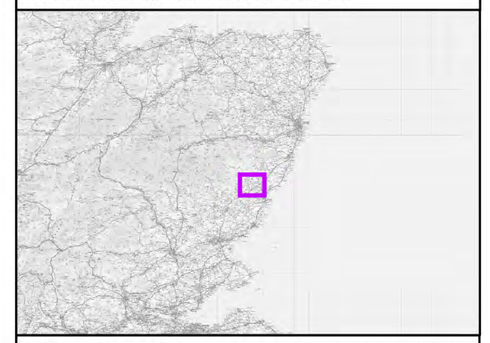

Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title:

Proposed Route August 2024 - Section C

Drawn by: HW

Date: 14/08/2024

Figure: C3.1

Scottish & Southern Electricity Networks

TRANSMISSION

LUC

360

370

770000m.N

770

D4

C1

B1.1

Scale @ A3: 1:50,000

0 1.25 2.5 5 km

360000m.E

370

Proposed Route

- B1.1
- C1
- D4

Refined Route*

- B1.1
- C1

Route section divider

*Refined routes are approximately 500m wide, within which we aim to identify an optimal alignment for the OHL

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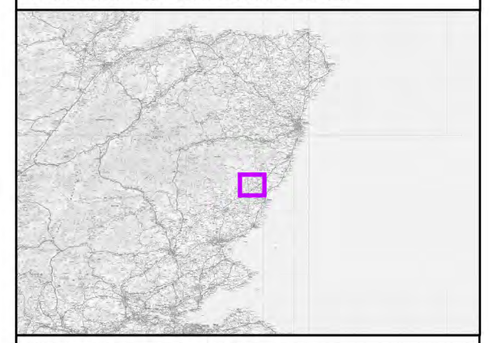


Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title:

Routes being taken forward to Alignment, August 2024 Section C

Drawn by: HW

Date: 15/08/2024

Figure: C3.2

Scottish & Southern Electricity Networks

TRANSMISSION

LUC

370

380

780

780000m.N

370000m.E

380

D4

C1

E2

Scale @ A3: 1:52,000

0 1.25 2.5 5 km

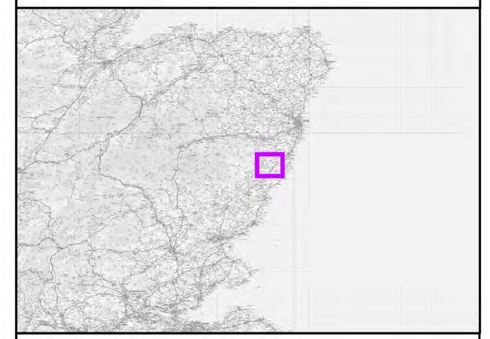
Proposed Route

- C1
- D4
- E2
- Route section divider

Substation

- Hurlie substation Proposal of Application Notice boundary (Aberdeenshire Council reference ENQ/2024/0146)

OS base maps are the latest available version from Ordnance Survey, dated July 2024. SSEN Transmission take no responsibility for the release or accuracy of latest version Basemaps from Ordnance Survey.



Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title:

Proposed Route August 2024 - Section D

Drawn by: HW

Date: 14/08/2024

Figure: C4.1

Scottish & Southern Electricity Networks

TRANSMISSION

LUC

370

380

780000m.N

780

E2

D4

C1

Scale @ A3: 1:52,000

0 1.25 2.5 5 km

370000m.E

380

Proposed Route

- C1
- D4
- E2

Refined Route*

- C1

Route section divider

Substation

Hurlie substation Proposal of Application Notice boundary (Aberdeenshire Council reference ENQ/2024/0146)

*Refined routes are approximately 500m wide, within which we aim to identify an optimal alignment for the OHL

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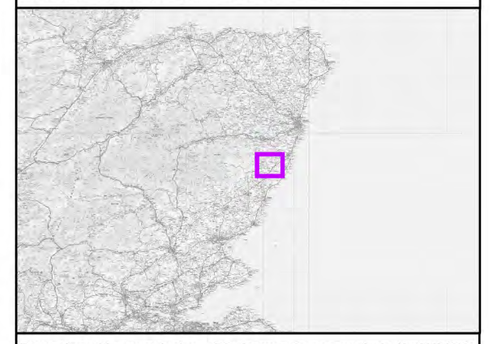

Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title:

Routes being taken forward to Alignment, August 2024
Section D

Drawn by: HW

Date: 15/08/2024

Figure: C4.2

380

Scottish & Southern Electricity Networks

TRANSMISSION

LUC

F1.3

F3

E1

E2

E4

D4

790000m.N

380000m.E

Scale @ A3: 1:51,000

0 1.25 2.5 5 km

Proposed Route

- D4
- E1
- E2
- F1.3

Additional options (identified following March 2024 consultation)

- E4
- F3
- Route section divider

Substation

- Hurlie substation Proposal of Application Notice boundary (Aberdeenshire Council reference ENQ/2024/0146)

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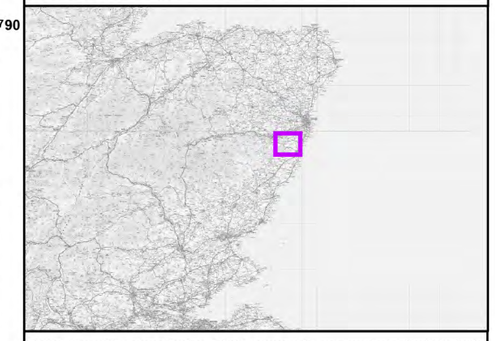

Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title:

Proposed Route August 2024 - Section E

Drawn by: HW

Date: 14/08/2024

Figure: C5.1

380

790000m.N

380000m.E

Scottish & Southern Electricity Networks

TRANSMISSION

LUC

F1.3

F3

E1

E4

E2

D4

Scale @ A3: 1:51,000

0 1.25 2.5 5 km

Proposed Route

- D4
- E1
- E2
- F1.3

Refined Route*

- E1

Additional options (identified following March 2024 consultation)

- E4
- F3
- Route section divider

Substation

- Hurlie substation Proposal of Application Notice boundary (Aberdeenshire Council reference ENQ/2024/0146)

*Refined routes are approximately 500m wide, within which we aim to identify an optimal alignment for the OHL

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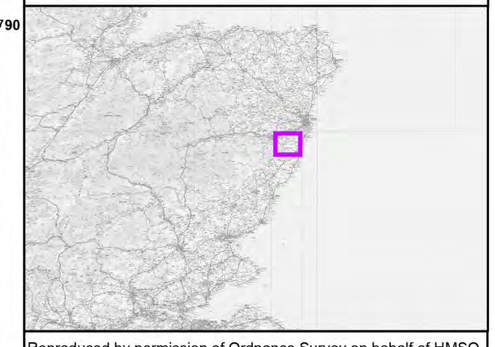


Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title:

Routes being taken forward to Alignment, August 2024
Section E

Drawn by: HW

Date: 15/08/2024

Figure: C5.2

Scottish & Southern Electricity Networks

TRANSMISSION

LUC

370

380

810

800

F2

F1.3

F3

E1

Proposed route widened to the east at Echt to allow alignment options to move further from property constraints.

Proposed route widened to the east at Schoolhill to allow for further alignment options that will increase distance from areas of flooding and residential properties.

Proposed route widened to the west at Schoolhill to provide alignment options that will increase distance from areas of flooding and residential properties.

Scale @ A3: 1:68,000

0 1.25 2.5 5 km

370000m.E

380

800000m.N

800

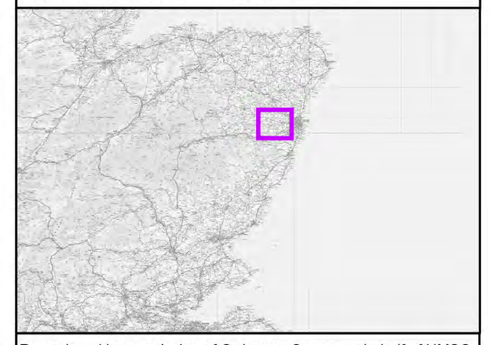
Proposed Route

- E1
- F1.3
- F2

Additional options (identified following March 2024 consultation)

- E4
- F3
- Route section divider

OS base maps are the latest available version from Ordnance Survey, dated July 2024. SSEN Transmission take no responsibility for the release or accuracy of latest version Basemaps from Ordnance Survey.



Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

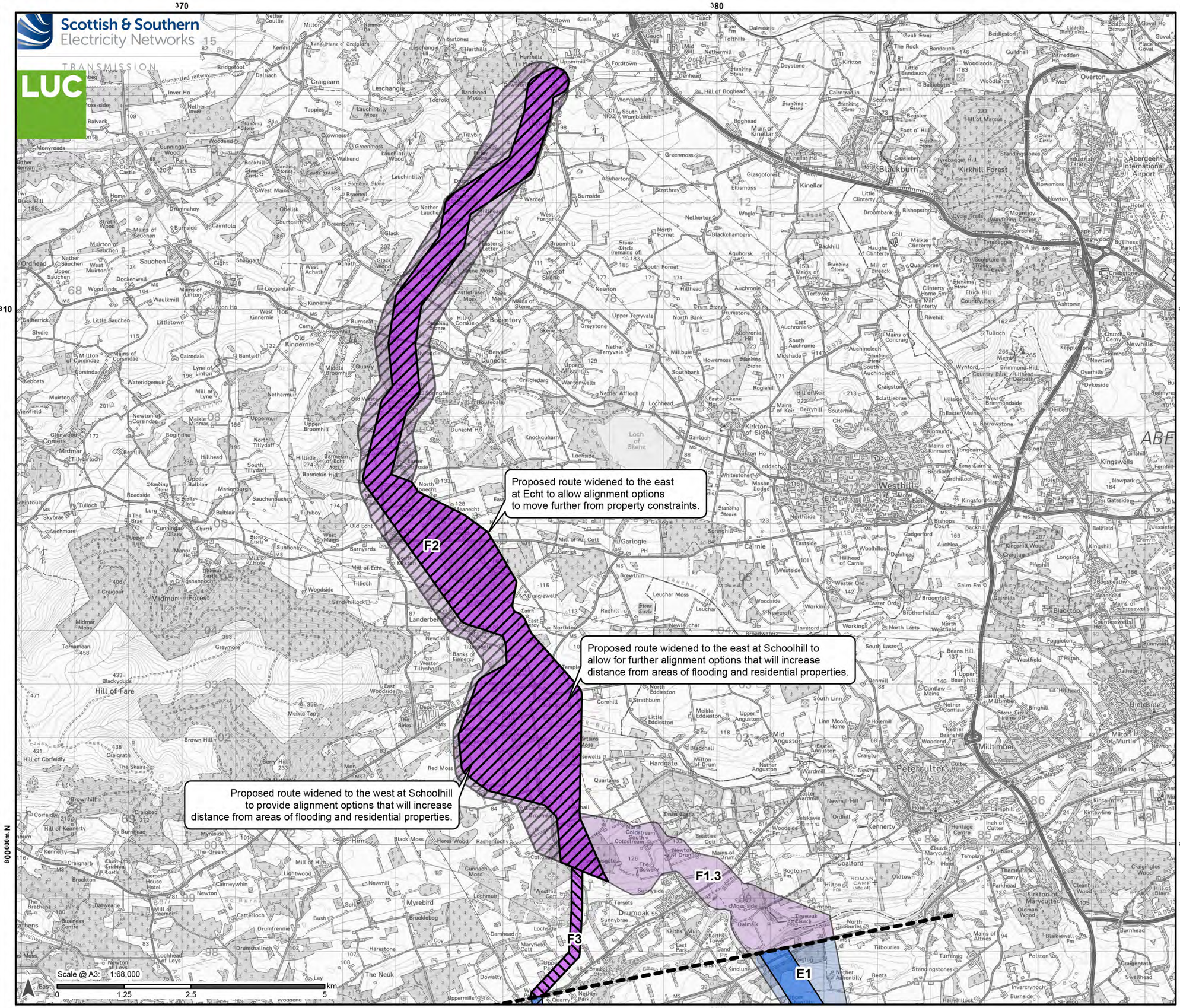
Title:

Proposed Route August 2024 - Section F

Drawn by: HW

Date: 14/08/2024

Figure: C6.1



Proposed Route

- E1
- F1.3
- F2

Refined Route*

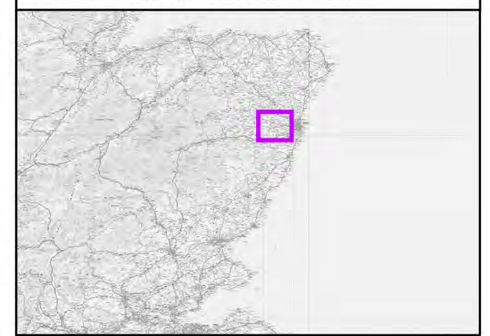
- E1
- F2

Additional options (identified following March 2024 consultation)

- E4
- F3
- Route section divider

*Refined routes are approximately 500m wide, within which we aim to identify an optimal alignment for the OHL

OS base maps are the latest available version from Ordnance Survey, dated July 2024. SSEN Transmission take no responsibility for the release or accuracy of latest version Basemaps from Ordnance Survey.



Project No: LT455

Project: Kintore to Tealing 400kV Overhead Line

Title:

Routes being taken forward to Alignment, August 2024
Section F

Drawn by: HW

Date: 15/08/2024

Figure: C6.2