

AGENDA ITEM 5

APPENDIX 3B

2022/0069/DET

**REPRESENTATIONS
GENERAL**

FAO Emma Wilson
Cairngorms National Park Authority
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Scottish Hydro Electric Transmission Plc
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22nd March 2022

Dear Ms Wilson,

Representation by SSEN Transmission in relation to planning application ref. 2022/0069/DET | Construction of battery energy storage facility (49.9 MW), control building, switch room, battery storage containers, inverter containers, landscaping and associated works | Land 380M West Of East Croftmore Boat Of Garten

Scottish and Southern Electricity Networks (SSEN Transmission), operating under licence held by Scottish Hydro Electric Transmission plc, owns, operates, and develops the high voltage electricity transmission system in the north of Scotland. This includes electricity transmission lines and associated substations which is a critical national infrastructure, classified as National Development under the National Planning Framework. It is a vital requirement to support the delivery of an enhanced high voltage electricity transmission grid and contributes to meeting national targets towards electricity generation, net zero, and security of energy supplies.

In respect of the above noted planning application, SSEN Transmission wishes to lodge a representation. We note that both the Highland Council and Cairngorm National Park are involved in the planning process so representations will be submitted to both authorities.

The proposed application site lies directly to the northwest of the Boat of Garten Substation and there is various transmission infrastructure within the locale including underground cabling. Therefore, there are concerns that the proposed layout may impact upon SSEN Transmission's existing underground cabling specifically in the areas with the proposed access track on the eastern side of the substation and the proposed landscaping in the northwest edge of the application site. It is noted that the proposed access track on the eastern side of the substation is sited over underground cabling and as such we would seek to agree any proposed method of crossing with heavy construction machinery. Moreover, the proposed landscaping to the north and west of our substation proposes vegetation over existing underground cabling which may create operational issues, and as such we would seek agreement prior to construction as discussed below.

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Scottish and Southern Electricity Networks is a trading name of: Scottish and Southern Energy Power Distribution Limited Registered in Scotland No. SC213459; Scottish Hydro Electric Transmission plc Registered in Scotland No. SC213461; Scottish Hydro Electric Power Distribution plc Registered in Scotland No. SC213460; (all having their Registered Offices at Inveralmond House 200 Dunkeld Road Perth PH1 3AQ); and Southern Electric Power Distribution plc Registered in England & Wales No. 04094290 having its Registered Office at 55 Vastern Road Reading Berkshire RG1 8BU which are members of the SSE Group www.ssen.co.uk

As such SSEN Transmission request that that if the application is to be granted, then a pre-commencement planning condition be attached to the consent that requires the developer to consult with SSEN Transmission and to seek our approval for method statements for any proposed construction works, access, landscaping and tree planting due to the presence of our underground cables.

It is also worth noting that SSEN Transmission are required through the Cairngorm VISTA¹ (Visual Impact of Scottish Transmission Assets) Project and the original consent to provide sufficient tree screening on the boundary of the Boat of Garten Substation to reduce the visual impacts in the local environment. As such we would seek to protect against the removal or damage of these trees which are crucial for screening the existing substation.

SSEN Transmission asks that the above concerns are considered and addressed before determining this application and that if it is granted, a pre-commencement planning condition is put in place that requires the applicant to agree with SSEN Transmission the construction works details, a detailed transport management plan in relation to the access road and any landscaping/tree strategies.

SSEN Transmission also wish to highlight that it is the Applicant's responsibility to safely construct and operate their Proposed Development in a manner that does not have any health and safety or operational impacts upon our transmission infrastructure including the Boat of Garten Substation and associated infrastructure which lies directly adjacent to the application site. As noted above, SSEN Transmission's assets are critical national infrastructure which are recognised as national developments under the National Planning Framework.

If you require any further information or plans to help clarify our position, please feel free to contact me.

Yours sincerely,



Leah Watton MRTPI
Town Planner
SSEN Transmission - Land Team

¹ VISTA is a £31.9M project funded as part of a £500M scheme administered by the energy regulator, Ofgem which allows the three GB electricity transmission owners to apply for funding to mitigate the impact of historic electricity infrastructure in National Parks and National Scenic Areas. [link](#)