



Cross Border Connection: Gala North Substation to the Scottish Border

Appendix 1: Statutory Consultee Responses

Response from Historic Environment Scotland



By email to: [REDACTED]
David Ritchie
Technical Director, EUR - UK & Ireland
AECOM

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

[REDACTED]
Our case ID: 300074238

09 September 2024

Dear David Ritchie

New 400kV overhead line between Gala North Substation and England
Pre-application consultation

Thank you for your email of 19 July 2024, which invited our pre-application comments on the above project. This letter contains our comments for our historic environment interests. Our remit is World Heritage Sites, scheduled monuments and their setting, category A-listed buildings and their setting, and garden and designed landscapes and battlefields in their respective inventories. Please also seek information and advice from the Scottish Borders council archaeology and conservation services for matters including non-designated archaeology and category B and C listed buildings.

Proposed development

I understand that you are inviting interested parties to comment on the proposals by Scottish Power Energy Networks (SPEN) on the preferred route option for a new cross-border double circuit 400kV overhead line (OHL) between the proposed Gala North substation in the Scottish Borders and a connection point in the north-west of England. We understand that the proposals are currently at a very early stage and are subject to change. On this basis, our comments are high-level.

Our advice

The preferred route option has the potential to impact significantly on the historic environment. Due to the early stage of the proposals and the limited assessment information currently provided in the consultation, our comments below are therefore necessarily limited but we will be happy to continue to work with you as the project develops to ascertain where significant impacts will be raised and how these could potentially be mitigated.

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Scottish Charity No. SC045925
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We understand that whilst consultation is taking place on an identified preferred option, that this is subject to change. We welcome the ongoing nature of the consultation and will provide further information on the wider set of route options in due course. We recommend that if you have not done so already, you engage a suitably experienced historic environment specialist to advise you on the likely impacts of the emerging route options.

For our detailed comments about your preferred route options, please see the attached annex. The annex includes our comments on historic environment assets within our remit that should be considered further in the development of the project.

Further information

Decisions that affect the historic environment should take the [Historic Environment Policy for Scotland](#) (HEPS) into account as a material consideration. HEPS is supported by our [Managing Change guidance series](#).

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultations mailbox, hmconsultations@hes.scot.

Yours sincerely

Historic Environment Scotland

Annex

[Scope of assessment](#)

This response relates to the preferred route option sent to us in August 2024, prior to the public consultation. We understand that the preferred route is subject to change.

The preferred route option has the potential for significant adverse impacts on a number of designated assets. Due to the limited assessment information currently provided, we are unable to confirm if these impacts would raise issues in the national interest that we would object.

[Potential physical impacts](#)

We note that 12 scheduled monuments and 1 category A listed building are located within the preferred route option. While we recognise that these are early-stage proposals, we would recommend that all steps are taken to avoid direct and indirect physical impacts to these assets at design phase, including design of pylon locations, access tracks, borrow pits, lay down areas and compounds, and any other physical work within the corridor.

In addition, please note that most works within a scheduled monument would require [scheduled monument consent](#) (SMC) from ourselves and any accidental damage to a scheduled monument, e.g. from vehicle movements, would be in breach of the Ancient Monuments and Archaeological Areas Act 1979, and would be an offence.

[Potential impacts on setting](#)

A large number of designated assets would likely have visibility of the proposed development, depending upon selected route option, and many of these assets have sensitive settings. An assessment of setting impacts upon designated heritage assets should be undertaken, aided by appropriate Zone of Theoretical Visibility (ZTV) and visualisations before the route is finalised. We would be happy to provide further advice on appropriate visualisations for our interests as your proposals develop.

Potential impacts on historic environment assets should be assessed using our [Managing Change in the Historic Environment: Setting](#) guidance, and any adverse impacts should be mitigated in line with that guidance. Mitigation measures to lessen any adverse impacts should be explored at an early stage. This could include considering how to reduce the visual impact of the overhead line towers through sensitive design. You should seek advice from a suitably experienced historic environment specialist on these matters.



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Cumulative impacts

We note reference to additional infrastructure including the proposed construction of a substation at Gala – south of Lauder and a substation identified at Teviot. The cumulative impacts of the proposed development and other developments in the vicinity should also be assessed in due course.

Principal Issues

Scheduled monuments

We have identified the following pinch points within the preferred route option which raise potential issues on assets within our remit.

Span over the Catrail

We note that the preferred route option would require spanning the scheduled monument [Catrail, Linear Earthwork, W of Leap Burn To 100m E of Langside Burn \(SM3468\)](#).

Towers close to the scheduled monument or overhead lines crossing it may cause significant impacts on its setting. Overhead line proposals should normally seek to avoid spanning over a scheduled monument and all available alternatives should be considered. Installing overhead lines across a monument may require [Scheduled Monument Consent](#) (SMC) from ourselves.

Any application would be considered according to our [Scheduled Monument Consents Policy](#) and it should not be assumed consent could be granted. We would encourage the applicant to engage with us in further pre-application discussions about the issues that this section of the preferred route option raises. A variation of the route may be necessary.

Monument cluster at Penchrise Pen

The preferred route option would take the proposed development within close proximity, either to the north or south, of [Penchrise Pen, Fort 635m SW of Penchrise Farm Cottage \(SM2296\)](#). This monument is a highly significant hillfort, dating probably to the Iron Age (between about 800 BC and AD 500). Banks and ditches enclose a central area on the hill summit and there is an annex to the west and an enclosure to the northeast. The monument is situated on Penchrise Pen and has extensive views in all directions and is a very prominent feature in the local landscape. Immediately to the south of the fort is [Pen Sike, earthwork 300m SW of Penchrise Pen \(SM3428\)](#) and immediately to the east of the fort sits [Penchrise Pen, Earthwork 420m E of \(SM3365\)](#), both monuments possibly contemporaneous with, and probably referencing the fort. The relationship between these monuments is an important part of their settings and should not be interrupted by the proposed development.

It is imperative that Penchrise Pen, Fort, with its distinctive hilltop setting and views in all directions, is not approached closely by the proposed development such that the sense of place and experience of being at the monument and key views are significantly impacted. The preferred route option currently proposed could cause a significant adverse impact on the integrity of this monument's setting, such that we might object to the proposal if brought forward. We strongly recommend impacts on scheduled monument setting here are carefully assessed and addressed during the design stage. Consideration will need to be given to widening the current corridor, or more probably altering the route corridor.

Hermitage Castle

The preferred route option would route the proposed development to the immediate east of [Hermitage Castle \(SM90161\)](#), a scheduled monument and Property in Care (PIC) of Scottish Ministers with a highly sensitive setting. It is essential the proposals are designed to minimise impact on the monument's setting. The aim should be to minimise the visibility of the proposed development in views from, to, or across the monument. For example, the setting includes views from the Chapel towards the Castle; if the present route option was used, it is probable the proposed development would be visible behind the Castle causing a significant adverse setting impact.

The preferred route option currently proposed could cause significant adverse impacts on the integrity of this monument's setting, such that we might object to the proposal if brought forward. It is likely that any overhead line running to the west of the Roughley Burn would raise these issues. We strongly recommend impacts on scheduled monument setting here are carefully assessed and addressed during the design stage, aided by appropriate ZTV and visualisations, before the route here is finalised. Consideration will need to be given to widening the current corridor, or more probably altering the route corridor, so that topography would screen the pylons in views from, to or across the monument.

We would again be happy to advise on the selection of viewpoints and then to comment on the implications of any impacts shown.

Category A listed buildings and Inventory Gardens and Designed Landscapes

Bowland

The inventory garden and designed landscape of [Bowland House \(GDL00066\)](#) and its estate is set within the upland valley landscape of the Gala Water. The parkland and woodlands extend up the south-facing slope of the narrow Crosslee Burn tributary valley and are mostly enclosed by the rolling plateaux of the Moorfoot Hills. Scenically, they

form a striking contrast with the surrounding heather and unimproved grassland of the uplands. Bowland House is prominently located on a hilltop site and forms the focal point of its garden and designed landscape and there are views towards the house in its setting from the B710 road to the south.

We note that preferred route option is located less than a 1km west-north-west of the inventory site and this may have a significant adverse impact on its setting. There is the potential for the proposed development to be visible on high ground to the north behind the house in the important view towards the designed landscape from the B710.

Bowhill

The preferred route option skirts approximately 1.5km to the west and south-west side of the inventory garden & designed landscape of [Bowhill \(GDL00605\)](#) across higher ground to the west. Views from Bowhill House are focussed away from the proposed development to the south, but the proposed development might appear prominent in views from western sides of the garden and designed landscape or in views towards it in which the proposed development might appear in the backdrop. This may result in a significant adverse impact on the setting of the Bowland garden and designed landscape.

Kirkhope Tower

The category A listed [Kirkhope Tower \(LB6720\)](#) is located within the preferred route option. It is a late 16th century restored tower house with rooftop wall-walk occupying a dramatic upland setting overlooking an ancient river crossing in the Ettrick Valley. The proposed development crosses the higher ground in which the tower is located which has the potential to result in significant adverse impacts on its setting. There are long views towards the tower in its upland setting from the minor road immediately to the south

Tentyfoot Tower & Branxholme Castle

The preferred route option is located approx. 3km to the south west of [Tentyfoot Tower \(LB8397\)](#) & [Branxholme Castle \(LB13686\)](#). Tentyfoot Tower forms part of the outer defences of Branxholme Castle. Built in the late 16th century as a mansion rather than a tower house with 18th and 19th century alterations and additions. It is located in a strategic site overlooking the River Teviot. The proposed development crosses higher land to the south-west and may be visible from the listed buildings.

Summary

At this stage and based on the information provided in the consultation documentation we have seen so far, there is the potential for significant impacts on the site and setting of designated historic environment assets in all of the routes of the proposed overhead

line. However, our comments in this response have focussed on the preferred route option. In some areas these impacts may reach a level of national interest that might require HES to object to the proposed development.

We would welcome further consultation as the proposals progress.

Historic Environment Scotland

09 September 2024



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By email to: [REDACTED]

CC: [REDACTED]

David Ritchie
Technical Director, EUR - UK & Ireland
AECOM

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Our case ID: 300074238

14 April 2025

Dear David Ritchie

New 400kV overhead line between Gala North Substation and England Pre-application consultation

Thank you for your email of 25 February 2025, which invited our pre-application comments on the updated route options for the project. This letter contains our comments for our historic environment interests. Our remit is World Heritage Sites, scheduled monuments and their setting, category A-listed buildings and their setting, and garden and designed landscapes and battlefields in their respective inventories. Please also seek information and advice from the Scottish Borders council archaeology and conservation services for matters including non-designated archaeology and category B and C listed buildings.

Proposed development

I understand that you are inviting our comments on the updated route options for a new cross-border double circuit 400kV overhead line (OHL) between the proposed Gala North substation in the Scottish Borders and a connection point in the north-west of England. We understand that the proposals are currently at a very early stage and are subject to change. On this basis, our comments are high-level.

Our advice

The route options presented have the potential to impact significantly on the historic environment. Due to the early stage of the proposals and the limited assessment information currently provided in the consultation, our comments below are therefore necessarily limited but we will be happy to continue to work with you as the project develops to ascertain where significant impacts will be raised and how these could potentially be mitigated.

We understand that whilst consultation is taking place on an identified preferred option, that this is subject to change. We recommend that you engage with your cultural heritage specialist to advise you on the likely impacts of the emerging route options.

For our detailed comments about the updated route options, please see the attached annex. The annex includes our comments on historic environment assets within our remit that should be considered further in the development of the project.

Further information

Decisions that affect the historic environment should take the [Historic Environment Policy for Scotland](#) (HEPS) into account as a material consideration. HEPS is supported by our [Managing Change guidance series](#).

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultations mailbox, hmconsultations@hes.scot.

Yours sincerely

Historic Environment Scotland

Annex

This response relates to the preferred route options sent to us on 25 February 2025, and we understand that the preferred route is subject to change.

Route Option 2B

Elibank Castle

[Scheduled Monument \(SM6163\)](#)

The monument comprises the remains of a late 16th century house with terraced gardens. It is located just west of a pinch point where Option 2B(3) crosses the River Tweed. The Castle sits on steeply sloping ground with forestry to the south and west. It commands excellent views along the Tweed, particularly to the east, and was clearly designed to control the adjacent fording points over the river. Equally, the later terraced garden suggests that the house took on a more formal designed role as a picturesque domestic monument intended to be viewed from approach along the Tweed from both east and west.

Route Option 2B(3) would cross the Tweed downstream of the monument and would be highly visible. At its closest, the corridor comes within c 360m of the monument. This proposed crossing point is significantly closer than previous options we have commented on. If the final alignment is not designed and sited appropriately, there is potential for a significant impact upon the integrity of the monument's setting, through interruption of views from the monument over the Tweed valley, and interruption of reciprocal views from the valley to the castle.

Yarrow Stone, inscribed stone 250m E of Whitefield

[Scheduled Monument \(SM1727\)](#)

Glebe Stone, standing stone

[Scheduled Monument \(SM2268\)](#)

Warrior's Rest, standing stone

[Scheduled Monument \(SM2212\)](#)

These monuments comprise a group of standing stones in the base of the Yarrow Valley in arable and pastoral land adjacent to the A708 and the Yarrow Water. They are likely related and form part of a prehistoric ceremonial landscape within the Yarrow Valley. Route Option 2B (Section B) would run within 500m of the monuments but would cross the Yarrow Water further west close to the head of the valley.



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The setting of this group of monuments is local and limited by the valley sides. The monuments are intervisible with each other and reference the line of the Yarrow Water, which is likely a key relationship and a key reason of their situation in this space. The Yarrow Valley is largely devoid of major energy infrastructure and the proposed development would be visible from the monuments, albeit upslope and potentially out of key views. Nevertheless, careful assessment and design would be needed to consider and limit impacts upon the setting of these monuments.

Route Option 1A (Section C)

We have commented previously on a group of prehistoric monuments south of Hawick that are prominently sited above the Dod and Penchrise Burns and have highly sensitive settings:

- **Penchrise Pen, Fort 635m SW of Penchrise Farm Cottage**
[Scheduled Monument \(SM2296\)](#)
- **Pen Sike, earthwork 300m SW of Penchrise Pen**
[Scheduled Monument \(SM3428\)](#)
- **Penchrise Pen, Earthwork 420m E of**
[Scheduled Monument \(SM3365\)](#)

Our previous comments largely stand. The proposed addition of a northern route option to bypass this cluster of monuments to the north (Route Option 1A(4)) would reduce the impact upon these monuments. However, the new northern spur of the route option raises new concerns for other assets in our remit (see below).

The remaining route options to the immediate north and south of *Penchrise Pen, Fort 635m SW of Penchrise Farm Cottage (SM2296)*, *Pen Sike, earthwork 300m SW of Penchrise Pen (SM3428)* and *Penchrise Pen, Earthwork 420m E of (SM3365)* are highly likely to result in significant adverse impacts upon the integrity of setting of these monuments such that we would object, so should be discounted.

This means that there are still significant unresolved issues with the route option as it passes the vicinity of Penchrise Pen.

The updated northern spur Route Option 1A(4) includes one scheduled monument and passes close to two more. *Barns Burn, fort 680m NW of Newton Hill (SM3363)* is within the route option, *Newton Hill, fort (SM2255)* is to the south-west of the route option and *White Knowe, settlement 180m W of Newton Hill (SM3386)* is to the south and south-west of the route option.

Barns Burn, fort 680m NW of Newton Hill

[Scheduled Monument \(SM3363\)](#)

The monument is of probable Iron Age date. It lies in the route option and any physical impact from construction or operation of the OHL should be avoided. The setting of the monument is focussed on clear views northwards and a relationship to the Barns Burn. Intervisibility with Newton Hill, fort is also important to understanding the position and function of the monument. The route option to the south of the monument would cut it off from the broadly contemporary *Newton Hill, fort (SM2255)*, while introduction of the route option to the immediate north of the monument could restrict and dominate views to the north.

White Knowe, settlement 180m W of Newton Hill

[Scheduled Monument \(SM3386\)](#)

The monument is a later prehistoric settlement and is sited on a shoulder of White Hill. The setting of the monument is largely focussed on the surrounding hill ground with some longer range views to the north-west over Barns Burn. It is probable that this site was positioned to be intervisible with and reference Barns Burn, fort and Newton Hill, fort. The route option would run to the north and north-east of the monument and would interrupt the visual connections with the local watercourse of Barns Burn and with Barns Burn, fort, and would immediately backdrop views from the monument to *Newton Hill fort (SM2255)*.

Newton Hill, fort

[Scheduled Monument \(SM2255\)](#)

The monument is a small, well-preserved fort occupying a slight knoll on the flat summit of Newton Hill. It lies on a knoll with clear and crucial long-range views over the hill slopes to the north-west, north, and east. The monument was likely designed to control a viewpoint over the adjacent Slitrig Water to the east and would have been highly visible on approach up this water course. Equally, the monument has clear relationships with the nearby Barns Burn, fort and White Knowe, settlement. The route option would run to the north and north-east of the monument and would interrupt the visual connection between the monument and the Slitrig Burn. Equally, the route option may come between the monument and Barns Burn, fort.

While this northern spur Route Option 1A(4) would reduce impacts upon the group of monuments at Penchrise Pen, it has the potential to cause significant adverse impacts upon the integrity of setting of *Barns Burn, fort (SM3363)*, *Newton Hill, fort (SM2255)* and



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White Knowe, settlement (SM3386) such that we may object if this option is taken forward.

There are additional assets in the vicinity where it should be possible to avoid significant impacts through careful assessment and design:

- **Stobs Camp, prisoner of war camp and cemetery, military training camp and trenches, Stobs**
[Scheduled Monument \(SM13767\)](#)
- **Catrail, Linear Earthwork, W of Leap Burn To 100m E of Langside Burn**
[Scheduled Monument \(SM3468\)](#)

Stobs Camp would also see setting impacts from Route Option 1A(4). However, the setting of the monument is robust and largely focussed on the ability to read and view the plan and extent of the monument. The associated *Stobs Camp rifle ranges, 650m W, 330m WNW and 450m SSE of White Knowe (SM13755)* sit significantly uphill and are not readily visible from the monument.

In addition, the *Catrail, Linear Earthwork (SM3468)* would be spanned by the proposed route option, but as this has not changed markedly since the previous consultation our previous comments still stand.

Route Option 1 (Section D)

We have previously highlighted a key asset with a very sensitive setting towards the south of the route:

Hermitage Castle, Castle, Chapel, Enclosures, Deer Trap, Park Boundary And Farmstead

[Scheduled Monument \(SM90161\)](#)

The monument comprises the remains of Hermitage Castle and several related features including a chapel and enclosures, a probable deer trap, a park boundary and a farmstead. The castle is an impressive upstanding stone building that was the focus of a highly important medieval power centre based in Liddesdale. Other than some restoration work by the Duke of Buccleuch in the 1820's, the site is one of the least disturbed major medieval castles in Scotland. It is one of the few locations in Scotland where it is still possible to view a medieval castle within a well-preserved relict landscape. The monument has significant cultural associations with Mary, Queen of Scots, Walter Scott, and the artists Henry Raeburn and JMW Turner. Alongside being a scheduled

monument, the castle is also a Property in Care of Scottish Ministers and is promoted as a visitor attraction

The setting of the monument is highly sensitive, and very careful assessment and design will be needed to avoid significant impacts on this setting. The setting is characterised by the relationships between the well preserved archaeological remains, the dramatic open and relatively undisturbed landscape of Liddesdale, and the strong historical and cultural associations of the site. It will be important to ensure key relationships between the different medieval elements in the landscape are not adversely impacted. In the context of this development proposal, it will be important to minimise impacts on views south-east and east from the park boundary and Chapel towards the Castle.

The route option would sit c.1.3km to the east of the monument with the corridor for Route Option 1 (Section D) positioned largely down within the valley which contains the Roughley Burn and on the slopes of Anton Fell. This location, dependent upon micro-siting, may be clearly visible from the monument. If the development was kept to the east side of the Roughley Burn and was not skylined on Anton Fell when viewed from the monument it is likely that significant impacts upon the monument's setting could be avoided. If, however, the proposed development was skylined in the background of views from the Chapel to the Castle, this would potentially result in a significant impact upon the integrity of the monument's setting such that we would object. Careful assessment and design of this section of the detailed alignment will therefore be essential.

Another scheduled monument in the vicinity of Route Option 1 (Section D) is:

Nine Stones, Stone Circle, Ninestone Rig

[Scheduled Monument \(SM1668\)](#)

This is a ritual monument dating from the Neolithic period located on the south end of a ridge of high ground between the valleys of the Roughley Burn and Whitrope Burn. The proposed OHL would lie to the east of the monument with the corridor for Route Option 1 Section D largely down within the valley which contains the Roughley Burn and on the slopes of Anton Fell beyond.

The stone circle features in local folklore as the backdrop to the grisly demise of Lord Soules, the wicked inhabitant of Hermitage Castle, who was entrapped by a sorcerer, encased in lead and roasted alive in a cauldron set in the centre of the stone circle. The monument is currently surrounded by plantation forestry, but a designed avenue to the south of the monument maintains a level of visual connection with the dropping ground in that direction. Plantation woodland cannot be relied upon to provide permanent screening



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of the OHL. The route of the OHL will require careful consideration but it may be possible to avoid significant setting impacts if the development is routed to the east side of the Roughley Burn and is not skylined on Anton Fell.

Route Option 2c (Section D)

There is a single scheduled monument within the corridor for Route Option 2c (Section D).

Kirk Hill, enclosure

[Scheduled Monument \(SM2149\)](#)

Kirk Hill, enclosure is an oval Iron Age hillfort situated on the rounded summit of Kirk Hill. The setting of the monument includes the open hill ground and elevated summit of Kirk Hill, which is the highest peak in the local landscape. The monument commands strong 360° views and is easily visible from surrounding hill ground. The monument also has clear designed views over Liddesdale valley to the east which were likely key to the intended function of the monument as a site of local control.

Any physical impact should be avoided. There is clear potential for impacts on its setting from construction of 60m tall pylons in this area; they may challenge the monument for local dominance of the ridge line and summit of Kirk Hill. If pylons were located between the monument and Liddesdale valley to the east, they would separate the monument from a key area of its setting. This could lead to a significant adverse impact on the integrity of the monument's setting and cause us to object. For this reason, Route Option 2a (Section D) would have less impact on our interests in this area.

Summary

Potential physical impacts

While we recognise that these are early-stage proposals, we would recommend that all steps are taken to avoid direct and indirect physical impacts to these assets at design phase, including design of pylon locations, access tracks, borrow pits, lay down areas and compounds, and any other physical work within the corridor. In addition, please note that most works within a scheduled monument would require [scheduled monument consent](#) (SMC) from ourselves and any accidental damage to a scheduled monument, e.g. from vehicle movements, would be in breach of the Ancient Monuments and Archaeological Areas Act 1979, and would be an offence.

Potential impacts on setting

A large number of designated assets would likely have visibility of the proposed development, depending upon selected route option, and many of these assets have sensitive settings. An assessment of setting impacts upon designated heritage assets should be undertaken, aided by appropriate Zone of Theoretical Visibility (ZTV) and visualisations before the route is finalised. We would be happy to provide further advice on appropriate visualisations for our interests as your proposals develop.

Potential impacts on historic environment assets should be assessed using our [Managing Change in the Historic Environment: Setting](#) guidance, and any adverse impacts should be mitigated in line with that guidance. Mitigation measures to lessen any adverse impacts should be explored at an early stage. This could include considering how to reduce the visual impact of the overhead line towers through sensitive design.

In our detailed comments on route options, we have highlighted at least one location where it does not appear possible to avoid significant setting impacts using the current preferred route options.

This affects the area south of Hawick where **Route Option 1A** passes the vicinity of Penchrise Pen. The two routes options passing to the north or south of Penchrise Pen would have potentially very significant setting impacts on a number of scheduled monuments. However, the alternative northern spur subsequently proposed would have risk significant adverse impacts on the setting of a different group of scheduled monuments. This means that there are still significant unresolved issues with the proposed route as it passes Penchrise Pen.

Elsewhere, careful assessment and design, together with micro-siting of any alignments may allow the avoidance of significant impacts on assets in our remit. However, in advance of detailed plans and visualisations, we cannot confirm that all these impacts could be successfully mitigated.

Our Advice

We would welcome consultation on a wider range of alternative route options, rather than being consulted sequentially on single route options. This would allow us to understand why certain options are being presented to us as preferred, and the degree of scope for different mitigation options. At this stage and based on the information provided in the consultation documentation we have seen so far, there is the potential for significant impacts on the site and setting of assets in all of the routes presented. However, our

Response from NatureScot

Response received: Mid-July 2024 (via MS Teams meeting with David Ritchie and Anne Brown).

Brief note of meeting:

Emerging route options and the preferred option were discussed, with the following key points noted:

- General agreement on west/east routeing considerations and greater landscape capacity to the **west** of the study area compared to the **east**.
- Route options aim to **avoid statutory ecological and landscape designations** where possible.
- The **River Tweed SAC and SSSI** cannot be avoided but is not expected to pose an issue as it would be **spanned by an overhead line (OHL)**.
- The **Langholm-Newcastleton SPA** was discussed; NS and others hold extensive monitoring data, with qualifying species concentrated around **Tarras Water** (west/centre of the designation).
- The **Tarras Valley Nature Reserve** was acknowledged as a local sensitivity.
- Based on the proposed route and sensitivities, **two seasons of bird survey data are not anticipated** to be required by NS.
- A project to **reintroduce golden eagles** to the south of Scotland in the **Moffat Hills** (west of the study area) was highlighted.



**Scottish
Forestry**
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na h-Alba

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Conservator: Neil Murray

Cross Border Connection Project
SP Energy Networks
55 Fullarton Drive,
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G32 8FA

by email: crossborderconnection@spenergynetworks.co.uk

Date: 23.09.2025

Dear Sir/Madam.

SP Energy Networks, Cross Border Connection – Gala North to Scottish Border

Thank you for consulting Scottish Forestry on the Scoping for this proposed development. Scottish Forestry is the Scottish Government agency responsible for policy, support and regulation of the forestry sector in Scotland. As such we comment on the potential impact of development proposals on forests and woodlands.

The first consideration for all woodland removal decisions should be whether the underlying purpose of the proposals can reasonably be met without resorting to 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

Scottish Forestry is the Scottish Government agency responsible for
forestry policy, support and regulation



Scottish Government
Riaghaltas na h-Alba

Is e Coilltearachd na h-Alba a' bhuidheann-ghnìomha aig Riaghaltas
na h-Alba a tha an urra ri poileasaidh, taic agus riaghladh do choilltearachd

Internal Use

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.

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;*

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.

Broader general comments in relating to proposals involving forests and woodlands.

Scottish Government's policy on control of woodland removal: implementation guidance February 2019 <https://forestry.gov.scot/support-regulations/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. 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. <https://forestry.gov.scot/sustainable-forestry/ukfs-scotland>

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-impact-assessment> 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/support-regulations/woodland-creation>

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

Response from Scottish Environment Protection Agency

DODSWORTH, THOMAS

From: Cross Border Connection Project
Sent: 26 February 2025 09:31
To: [REDACTED]
Cc: Ritchie, David; DODSWORTH, THOMAS
Subject: RE: Scotland-England Onshore Electricity Transmission Reinforcement SEPA ref PCS20002235
Attachments: GH_P10_Prefered_Route_Option_v1_250224_A3_Portrait_50k_Colour.jpg
Categories: Related to Salesforce

Dear Alasdair

Our consultants at Aecom have previously been in touch with you regarding the above project (now referred to as the Cross Border Connection).

We carried out a round of public consultation on a preferred route late last year. We have since made modifications to that preferred route in response to feedback and information we received through that consultation. We will be re-engaging communities in March and April to consult on the modified preferred route.

I appreciate that when we contacted you last year, we were only able to share a study area. I am pleased to now attach a map showing our modified preferred route. As we are progressing towards confirmation of the proposed route, feedback from SEPA at this juncture would ensure that the route we take forward takes into account information that you are able to provide.

In addition, we are initiating discussions around EIA scoping and we would be looking to engage SEPA on this too.

To kick off the discussions, I'd be grateful for your time on a Teams call. Please let me know your availability in the first half of March and I will schedule a call.

Kind regards
Marlene



Cross Border Connection Team

SP Energy Networks, 55 Fullarton Drive, Glasgow, G32 8FA

Follow us



Central and Southern Scotland
Connections 0845 270 0785
General enquiries 0330 10 10 444



From: Milne, Alasdair [REDACTED]
Sent: Friday, July 12, 2024 10:07 AM
To: Ritchie, David [REDACTED]
Subject: RE: Scotland-England Onshore Electricity Transmission Reinforcement SEPA ref PCS20002235

OFFICIAL

David,

Thank you for consulting SEPA on the proposed Scotland-England transmission reinforcement project.

I have discussed your request for a meeting with colleagues in the local regulatory team and also our ecology team and we consider that at this stage, taking into account the nature of your consultation and the variety of route options being considered, we are best to respond to you with our standard scoping comments. We would, of course, offer detailed, targeted comments at the formal planning application consultation stage. I understand SPEN are aware of our standard comments however I have attached a copy for your reference. Although this relates to windfarms, the issues identified are equally applicable to transmission projects.

Please let me know if you require further information.

Regards
Alasdair

Alasdair Milne | Senior Planning Officer
Scottish Environment Protection Agency



[REDACTED]



[REDACTED]



[REDACTED]

[REDACTED]

OFFICIAL

From: Ritchie, David [REDACTED]
Sent: Monday, July 8, 2024 10:06 AM
To: Milne, Alasdair [REDACTED]
Cc: MARIMBE, MARLENE [REDACTED]
Subject: Scotland-England Onshore Electricity Transmission Reinforcement

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Alasdair,

AECOM is undertaking a routeing study on behalf of SP Energy Networks (SPEN) with regard to the development of a new cross-border double circuit 400kV overhead line route between the proposed Gala North Substation in the Scottish Borders and a connection point in the northwest of England. The attached plan illustrates the study area within which potential route options are being identified and assessed. As part of the routeing study and in advance of consultation in the late summer period we'd welcome the opportunity

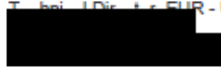
to discuss the project with you as well as seek feedback on our approach, key routeing considerations and emerging route options.

I'd be grateful if you could indicate any availability you have during this month for a Teams meeting or alternatively we'd be pleased to meet in person. If you are not the appropriate individual within your organisation to respond to the consultation I would appreciate it if you would be able to forward this email on.

Kind regards
Dave

David Ritchie

Technical Director - EUR - UK & Ireland



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**CONSULTATION RESPONSE TO
PLANNING OR RELATED APPLICATION**

Comments provided by	Roads Planning Service	
Officer Name, Post and Contact Details	Alan Scott Senior Roads Planning Officer	
Date of reply	12 th November 2024	Consultee reference:
Planning Application Reference	24/01012/PREAPM	Case Officer: Kyle Wise
Applicant	SP Transmission PLC	
Agent	Scottish Power Energy Networks	
Proposed Development	Reinforcement connection project	
Site Location	Scottish Borders – Lauder to Newcastleton	
<i>The following observations represent the comments of the consultee on the submitted application as they relate to the area of expertise of that consultee. A decision on the application can only be made after consideration of all relevant information, consultations and material considerations.</i>		
Background and Site description		
Key Issues (Bullet points)		
Assessment	There are no major issues with regards this proposal from a roads perspective. My only considerations which I would require to be taken into account should a formal proposal be forth coming are: • All pylons should ideally be set back an appropriate distance from any public road. This should be a minimum of 1.5 x the height so as to allow for topple incidents. • All overhead cables should have the appropriate clearance over any public roads. • Details of the sub-station should be provided, particularly with regards access location. • A construction management plan (CTMP) should be submitted with regards to the traffic associated with all elements of construction. This should include details of proposed traffic movements, particularly HGV's. • Details of any abnormal load movements must be provided for consideration to ensure the route is acceptable and whether any remedial works are required. • Discussions with Transport Scotland should take place where the works are adjacent to a trunk road. • Discussions with Network Rail should take place where the works are adjacent to the Borders Railway.	

Signed: [REDACTED]

DODSWORTH, THOMAS

From: DODSWORTH, THOMAS
Sent: 23 August 2024 16:13
To: [REDACTED]
Cc: [REDACTED] MARIMBE, MARLENE
Subject: SBC Pre-Application Advice Form - CMN3 Cross Border Connection Project
Attachments: Planningpre_application_AdviceForm2024__INTER - Scottish Borders Council.pdf;
Preferred Route Option v1.pdf

Good afternoon,

I am submitting a pre-application advice form for a proposed reinforcement connection project on behalf on the project team at SP Energy Networks. Please find the 'Pre-Application Advice Form' and accompanying 'Preferred Route Option V1' attached.

Please feel free to reach out if you need any additional information.

Kind regards,
Tom Dodsworth



Tom Dodsworth | Land and Planning Graduate
Tel: - | Int: - | Mob: [REDACTED]

SP Energy Networks, 55 Fullarton Drive, Cambuslang, G32 8FA

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Central and Southern Scotland
Connections 0845 270 0785
General enquiries 0330 10 10 444

**POWER CUT?
CALL 105**



From: Wise, Kyle [REDACTED]
Sent: 15 January 2025 13:38
To: MARIMBE, MARLENE
Cc: DODSWORTH, THOMAS; O'Kane, Denis; Fotheringham, Barry
Subject: RE: [OFFICIAL] RE: Pre-a acknowledgement letter for application 24/01012/PREAPM
Attachments: Ecology.docx; Access Officer.docx; Environmental Health.pdf; Flood Risk.pdf; Landscape Architect.pdf; Planning Policy.pdf; Roads Planning.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

EXTERNAL SENDER: Be cautious, especially with links and attachments. Report phishing if suspicious.

Hi Marlene,

Thanks for the update and my apologies for my delay in responding to you, December and January have been very busy.

Please see attached the consultation comments we have received so far for the enquiry. I also asked for comments from our Heritage and Design Officer, and Archaeologist but have yet to receive anything from them.

Unfortunately, I'm having to prioritise writing my report for a S.36 application I'm seeking to take to our next planning committee, so I will be able to reply in full after this deadline. So, I would hope to be able to get back to you w/c 27 January. I will be on annual leave from the 31 Jan to 14 February, and unfortunately my calendar is very busy up till then in between, so it is unlikely we will be able to have a meeting before then.

The only date that has potential prior to then is Wed 29th January at some time between 12 to 5pm, would this suit? I can ask around the team if so, however given the high-level of the enquiry and limited detail, I'm unsure how much more other members of the team could add here, other than there written comments attached, potentially my Landscape Architect could attend given her concerns and that in its nature, landscape will be a key issue regardless of the settled route. I'm also mindful you would likely need to wait till after I return from annual leave till you would likely get your written feedback, so this is something to consider and whether a later date would be more suitable once I've returned.

Please note, as I've said before, we will be commenting on what we have received and any further comments on amended routing etc. will need to come via a new pre-app enquiry.

Kind regards,

Kyle

Kyle Wise MRTPI
Planning Officer
Planning, Housing & Related Services
Scottish Borders Council
Tel: [REDACTED]
E-mail: [REDACTED]

CONSULTATION RESPONSE TO
PLANNING OR RELATED APPLICATION

Comments provided by	Officer Name and Post:	Contact e-mail/number:
	Stuart Herkes	
Date of reply	18 November 2024	Consultee reference:
Planning Application Reference	24/01012/PREAPM	Case Officer: Kyle Wise
Applicant	SP Transmission PLC	
Agent	Scottish Power Energy Networks	
Proposed Development	Reinforcement connection project	
Site Location	Land to West of Netherfield, Upper Blainslie, to Land South of Kershopefoot, Newcastleton	
<i>The following observations represent the comments of the consultee on the submitted application as they relate to the area of expertise of that consultee. A decision on the application can only be made after consideration of all relevant information, consultations and material considerations.</i>		
Background and Site description	This high-level pre-application enquiry relates to the proposed construction of a 400kV high voltage electricity overhead powerline. This would run for a distance of around 80km, southwards from a 'proposed Gala North 400kV Substation' to an interface with the National Grid (the B6 boundary) on the border, somewhere in the vicinity of Kershopefoot. The proposal would be routed through Teviotdale and includes a proposed 5 to 6ha 'Teviot substation'. The supporting plan is a small-scale map (1:250,000) entitled 'Study Area'. This describes in red outline the "Preferred Route Option", as a broad 'corridor' of landscape, around 80km long and varying in width from under half a kilometre to over 2 kilometres. No more specific proposed site or route is otherwise identified within the supporting details. Beyond high-level written details, no plans or drawings have been provided to describe any specific proposed location, layout or design for the proposed 'Teviot substation', or any component within, or relating to, it. Further, while the proposal alludes to the powerline commencing from another substation – a "proposed Gala North 400kV Substation, located near Blainslie and Birkhill, South of Lauder" - no details of this facility have been provided in support of the proposal. The Planning Policy Section does not consider that there is sufficient or sufficiently detailed information with regard to the two indicated substations to advise on these elements of the proposal. Accordingly, the focus of this consultation response is the 400kV high voltage electricity overhead powerline proposal, albeit only in so far as it is described by the high-level written description and the parameters indicated by the 'Preferred Route Option' identified for its routing. The proposed powerline, the subject of a project initially known as <i>CMN3</i>, but now referred to as the <i>Cross Border Connection</i>, would	

	take the form of a new double circuit 400kV overhead line. The total circuit length in the Scottish Borders, would be around 80km. The overhead line would be supported <i>its entire length</i> on steel lattice towers. These would have a standard height of around 50 metres, going up to 61 metres where required, to ensure electrical safety clearance to the ground. The proposed base dimensions of the towers are given as 12 by 6m. These pylons would be sited between 200m and 300m apart, but again, the exact distances would vary depending on the specific circumstances, including the safe, effective transversal of features such as roads, rivers and railways. It would run along a predominantly north-south orientated 'corridor', which largely routes around and away from bigger settlements. From Nether Blainslie it would initially be routed west, crossing the A7 at a point to the south of Stow, and then from there, run southwest, traversing the A72 at a point to the east of Walkerburn, before running in a generally southwards direction, crossing the Southern Upland Way to the northwest of Selkirk, before turning southeast into Teviotdale, crossing the A7 again at a point between Newmill and Teviothead, before then running southeast into Liddesdale, and down to the west of Newcastleton, before an interface with the B6 boundary in the vicinity of Kershopefoot Forest. There are no details of where the higher pylons would be employed, while the small-scale nature of the map and the broad 'corridor' described therein, make it difficult to ascertain precisely where the powerline would be routed relative to designations and residential properties within and around the 'corridor'. However, it is clear even at this scale of map, and having regard to the height and extent of the powerline, that the proposal would be liable to impact residential properties, communities and their environs, as well as an array of designations of international, national and local significance, including: • Hazard Pipeline Buffers • Sites of Special Scientific Interest • Garden and Designed Landscape • Special Area of Conservation • Special Landscape Area • Southern Upland Way • Railway Safeguarding • Former Railway Network Locally, there is potential to impact both designated and undesignated historic environment assets and natural heritage assets and/or their settings. Accordingly, besides the clear potential for these impacts, the specific route, and precise impacts are not readily discernible at this scale. Therefore the acceptability of these impacts and any mitigation that might be required, cannot be ascertained at this time.
Key Issues (Bullet points)	The proposal must be assessed against the policies and guidance of the Adopted National Planning Framework 4 [NPF4] and the policies and guidance of the Adopted Scottish Borders Council Local Development Plan 2024 [LDP2], chiefly: <u>National Planning Framework 4</u> Policy 1 – Tackling the climate and nature crises

	Policy 2 – Climate mitigation and adaptation Policy 3 - Biodiversity Policy 4 - Natural places Policy 5 - Soils Policy 6 – Forestry, woodland and trees Policy 7 – Historic assets and places Policy 11 – Energy Policy 18 – Infrastructure first Policy 23 – Health and safety Policy 25 – Community wealth building Policy 29 – Rural development Policy 33 - Minerals <u>Scottish Borders Council Local Development Plan 2024</u> Policy PMD1 – Sustainability Policy PMD2 – Quality Standards Policy ED7 – Business, Tourism and Leisure Development in the Countryside Policy ED9 – Renewable Energy Development Policy ED10 – Protection of Prime Quality Agricultural Land And Carbon Rich Soils Policy ED11 – Safeguarding of Mineral Deposits Policy HD3 – Protection of Residential Amenity Policy EP1 – International Nature Conservation Sites and Protected Species Policy EP2 - National Nature Conservation Sites and Protected Species Policy EP3 – Local Biodiversity and Geodiversity Policy EP5 – Special Landscape Areas Policy EP7 – Listed Buildings Policy EP8 – Historic Environment Assets and Scheduled Monuments Policy EP10 – Gardens and Designed Landscapes Policy EP12 – Green Networks Policy EP13 – Trees, Woodlands and Hedgerows Policy EP15 – Development Affecting the Water Environment Policy IS5 – Protection of Access Routes Policy IS11 – Hazardous Development Policy IS12 – Development Within Exclusion Zones <u>Scottish Borders Council Supplementary Planning Guidance</u> Biodiversity [2005] Local Landscape Designations [2012] Landscape and Development [2008] Trees and Development [2008] Renewable Energy [2018] <u>Other Material Considerations</u> <i>Scottish Government</i> Consultation Draft Energy Strategy and Just Transition [2023] Onshore Wind Development Statement [2022] Update to the Climate Change Plan 2018 – 2032 Securing a Green Recovery on a Path to Net Zero [2020] The Future of Energy in Scotland: Scottish Energy Strategy [2017]
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	Scottish Borders Council Climate Change Route Map [2021] Local Heat and Energy Efficiency Strategy 2024-28 [2024] National Energy System Operator [National Grid] Beyond 2030: A National Blueprint for a Decarbonised Electricity System in Great Britain [2024] UK Government Powering Up Britain [2023] Powering Up Britain – Energy Security Plan [2023] Powering Up Britain – The Net Zero Growth Plan [2023]
Assessment	Principle Planning policy, both at the national and local level, is strongly supportive of renewable energy development, including, explicitly, the infrastructure required to transmit and deliver it to its point of use. Meeting targets for renewable energy generation and reducing fossil fuel emissions, are key drivers in both the UK and Scottish Governments' policies, as well as recognised in Scottish Borders Council's own Climate Change Route Map (2021) and Local Heat and Energy Efficiency Strategy (2024). More specifically, the need for CMN3, a new circuit between southeast Scotland and northwest England, and the specific electricity network reinforcement this proposal is intended to address, is explicitly identified by the National Energy System Operator in <i>Beyond 2030: A National Blueprint for a Decarbonised Electricity System in Great Britain</i> [2024]. At page 60 of the latter, it is specifically advised that CMN3 will greatly increase the network capability between southern Scotland and northern England; increase access to the transmission network in the Borders area; reduce constraint costs for consumers; and allow onshore and offshore wind to be used more effectively. Within <i>Beyond 2030</i>, CMN3 is only indicated at a high-level, by a dashed green line running south from 'Gala North' to a non-specific location on the border. CMN3 is now being taken forward by SPEN in conjunction with the National Grid Energy Transmission [NGET], as the <i>Cross Border Connection</i>. The proposal that is the subject of this current preapplication enquiry is understood to relate directly to this project. Amongst the National Development proposals supported in the interests of delivering sustainable places, NPF4 specifically includes 'Strategic Renewable Electricity Generation and Transmission Infrastructure', which it is clarified at page 07, is development that: "supports electricity generation and associated grid infrastructure throughout Scotland, providing employment and opportunities for community benefit, helping to reduce emissions and improve security of supply". NPF4's Energy section, pages 53-54, includes the key planning policy (Policy 11) and guidance framework for the assessment of energy proposals. This explicitly establishes support for "new and replacement transmission and distribution infrastructure", and within Policy 11 itself, Part a) specifically identifies support in principle for "enabling works, such as

	<i>grid transmission and distribution infrastructure</i>". However, under the other provisions of Policy 11 - specifically Parts b), c), d) and e) - it is indicated that support in practice for any specific energy transmission and infrastructure proposal, will still depend upon it being able to address the requirements of these other provisions. Support is dependent upon the proposal: being able to maximise net economic impact; having no unacceptable impacts upon any international or national designations (as set out under Policy 4); and demonstrating how impacts would be addressed through its project design and mitigation. These particular matters are considered in more detail below. LDP2 Policy ED9 reiterates and references NPF4 Policy 11, such that addressing the latter will simultaneously suffice to address the former. In summary, owing to its strong alignment with national and local planning strategies and policies, and wider policy objectives of national and local government, not to mention the specific identification of this reinforcement project within the NESO's proposals to upgrade the national grid, it is considered that the principle of this proposal is strongly supported. However, as per Policy 11, support for the specific accommodation of this proposal - including in terms of the detail of its routing and accommodation on site, and relative to its surroundings - is nonetheless still dependent upon the assessment of its impacts upon local communities and the environment; and principally having regard to: its local and community socio-economic benefits; its impacts upon international and national designations; and its project design and mitigation demonstrating that other impacts are appropriately addressed. The following ulterior considerations are salient: <u>'Right Development in the Right Place'</u> In terms of assessing proposals against planning policy, decision-makers must have regard to NPF4's policies <i>when read as a whole</i>. Further, in the interpretation of these policies, regard must be had to the National Spatial Strategy, which, it is advised at page 7 of NPF4, is underpinned by the concern to meet our climate ambition through "<i>a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place</i>". While this provides strong support for the principle of the timely accommodation of renewable energy generation and transmission, it also acknowledges the concern to ensure that these needs are met in the most appropriate way; not at the expense of everything else. <u>Local and Community Socio-Economic Benefits</u> It is anticipated that the proposal, by virtue of its ability to directly meet a need that has been identified by the NESO in <i>Beyond 2030</i>, would be liable to have positive impacts upon the local economy and benefit local communities through improvements to the electricity transmission infrastructure. Based on the information contained within the pre-app, it is unclear whether, and how in fact, the proposal would specifically be able to "<i>maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities</i>". The applicant should include appropriate details on this aspect as part of any application.
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	<u>International and National Designations</u> As noted, it is difficult to establish to what extent international and national designations would be impacted by the proposal, owing to the high-level, if not indicative, description of the proposed routeing, and to the lack of details about the specific accommodation of the powerline over each section of the route. Accordingly, other than noting the potential for direct and indirect impacts upon several such designations, the acceptability of these impacts, or any mitigation that might be proposed to address them, cannot be assessed, let alone determined. At this stage, it cannot be ruled out that there is potential for unacceptable impacts at some points along the indicated route. Again, the applicant should be advised to include appropriate details in support of any further pre-application or application they make. <u>Other Environmental and Amenity Impacts, including Cumulative Impacts</u> Ultimately support for a specific renewable energy proposal, including transmission and network infrastructure, would be contingent upon it being demonstrated that the specific proposal would have no unacceptable impacts upon the environment and amenity of its site and surroundings. Given that the pre-app relates to a wider corridor, the specific routeing of the line, must take into consideration any potential impacts upon any nearby communities/residential properties and any environmental designation and assets, in and near the site boundary. <u>Conclusion</u> While it is possible to anticipate strong support in principle - both as a national development that is explicitly supported within NPF4 and as a type of development that is explicitly supported under Policies 11 and ED9 - consideration of the specific proposal is otherwise limited by the high-level, indicative nature of the description of its proposed accommodation on the ground. The details relating to its siting, only amount to a broad 'area of search' for its routeing, with no specific details about how the powerline would be accommodated in any specific area, including relative to neighbouring communities and designations. Accordingly, the Planning Policy section has provided a high level response on this occasion, but would be happy to provide a more detailed response when a specific route is finalised and more details are available for review.			
Recommendation	☐ Object	☐ Do not object	☐ Do not object, subject to conditions	☒ Further information required
Recommended Conditions	Not applicable at this stage.			
Recommended Informatives	Not applicable at this stage.			

From: McDermott, Siobhan [REDACTED]
Sent: 21 November 2024 13:54
To: Wise, Kyle [REDACTED]
Cc: Andrews, Catherine [REDACTED]
Subject: RE: CONSULT - 24/01012/PREAPM - SPEN CMN3 Cross Border Connection Project

Kyle,

I am responding to your request for Pre-App response to the Cross Border Connection Project. I have serious concerns about the landscape and visual effects on the Borders landscape of introducing a 400kV overhead line, carried on 50m tall (up to 61m where necessary for ground clearance) as well as the associated infrastructure, such as sub stations. I understand this will be a National Development as per NPF4 -Annex B – National Developments Statement of Need: 3 – Strategic Renewable Electricity Generation and Transmission Infrastructure. From a Landscape and Visual perspective, the proposal along the route shown on the Location Plan has the potential to have significant landscape and visual effects as over the 80km route identified, it has potential to affect a wide range of sensitive receptors including :-

- Designed Landscapes – Bowland, Bowhill and Hangingshaw (HES Inventory Designed Landscapes) and the following locally recognised Designed Landscapes – Firmiehurst, Elibank, Ashiestiel, Borthwickbrae, Chisholme, Stobs Castle and Priestthaugh. [Gardens and designed landscapes | Scottish Borders Council](#)
- Designated Landscapes (Special Landscape Areas) – Tweed Yarrow and Ettrick Confluences SLA and Tweed Valley SLA
- Woodlands on the Ancient Woodland Inventory
- Environmental Designations including SSSI and SACs
- Paths and long distance routes through the Borders, including Southern Upland Way, Borders Abbey Way, Romans and Reivers Route.

In preparing an EIA, the applicant should undertake a comprehensive Landscape and Visual Assessment in accordance with Guidelines for Landscape and Visual Impact Assessment; 3rd Edition, giving due consideration to the sensitive landscape and visual receptors listed above and through discussion with both the Council and local stakeholders should make a provisional selection of potential viewpoints from which to assess the visual impact of the proposal. A scoping report might best provide a means of establishing the range of topics to be addressed in the EIA.

I would welcome further information on the route appraisal options bearing in mind the route shown on the location plan crosses some of Scottish Borders landscapes of highest amenity value and by traversing a number of ridges separating the different river catchments has the potential to be highly prominent in these sensitive locations. Further information on the strategy when traversing forestry and other land uses would be valuable as any forest clearing could have potential landscape and visual effects and may require compensatory woodland creation to comply with the Scottish Government's Control of Woodland Removal Policy. The Tweed valley is one of the most wooded areas in Scottish Borders and any requirement to remove trees could increase the visual impacts, in a negative way, unless approached with sensitivity. The application of the Holford Rules in formulating preferred route(s) will be a pre-requisite of route analysis and selection. Given the very limited amount of information submitted, this is a very limited response to what appears to be a major development in some of the most sensitive locations in Scottish Borders and it should not be assumed that the full range of issues and topics to be addressed in the planning of the proposal have been covered above.

Happy to discuss further as necessary

Siobhan McDermott
Landscape Architect

Heritage and Design
Regulatory Services
Scottish Borders Council
Newtown St Boswells, Melrose TD6 0SA
tel: [REDACTED]
fax: [REDACTED]

Normal working days: Wednesday – Friday

email: [REDACTED]

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**CONSULTATION RESPONSE TO
PLANNING OR RELATED APPLICATION**

Comments provided by	Flood & Coastal Management	Contact e-mail/number:
Officer Name and Post:	Paul Grigor Flood Engineer	[REDACTED]
Date of reply	14 th November 2024	Consultee reference:
Planning Application Reference	24/01012/PREAPM	Case Officer: Kyle Wise
Applicant	SP Transmission PLC	
Agent	Scottish Power Energy Networks	
Proposed Development	Reinforcement connection project	
Site Location	Land To West Of Netherfield Upper Blainslie To Land South Of Kershopefoot Newcastleton Scottish Borders	
<i>The following observations represent the comments of the consultee on the submitted application as they relate to the area of expertise of that consultee. A decision on the application can only be made after consideration of all relevant information, consultations and material considerations.</i>		
Background and Site description		
Key Issues (Bullet points)		
Assessment	The information provided as part of this pre-app is very limited in terms of detail with only a preferred route shown, therefore my comments will be high level until more detailed information submitted. • 50m buffer to all watercourses, unless otherwise agreed. • Avoid flood risk areas, see SEPA flood maps. • Details of any temporary/permanent water crossings as part of the construction phase. • Silt mitigation measures for working in and around water courses and to prevent silt run off from hard surfaces. Further comments may arise once detailed information is available.	
Recommendation	☐ Object ☐ Do not object ☐ Do not object, subject to conditions ☒ Further information required	
Recommended Conditions		
Recommended Informatives		

Subject:

FW: CONSULT - 24/01012/PREAPM - SPEN CMN3 Cross Border Connection Project

Kyle Wise MRTPI
Planning Officer
Planning, Housing & Related Services
Scottish Borders Council
Tel: [REDACTED]
E-mail: [REDACTED]

From: Scott, Annabelle [REDACTED]
Sent: 19 March 2025 15:48
To: Wise, Kyle [REDACTED]
Subject: RE: CONSULT - 24/01012/PREAPM - SPEN CMN3 Cross Border Connection Project

Hello Kyle

I have been passed your email regarding the cross border connection project.

This project does pass over two SBC sites:

Lauder Common (Lauder Common Good) on which we have an agricultural tenant.

The waste site and depot at Langlee.

Do you need ownership maps?

At Langlee I would be concerned over the impact of the lines on the day to day operations of the refuse and recycling site and this would need to be taken into consideration when planning any pylon sites. I would be beneficial to see more detailed plans for this site sooner rather than later as we are also dealing with the gala to Eccles upgrade at this location.

Do come back to me if you need anything further?

Regards

Annabelle

Annabelle Scott
Estates Strategy
Scottish Borders Council, Newtown St. Boswells
Melrose TD6 0SA
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PRE-APPLICATION CONSULTATION

To: Environmental Health

From: Development Management

Date: 23rd October 2024

Contact: Kyle Wise ☎ Ref: 24/01012/PREAPM

PRE-APPLICATION CONSULTATION

Your observations are requested on the under noted pre-application enquiry. I shall be glad to have your reply no later than 13th November 2024, If further time will be required for a reply please let me know. If no extension of time is requested and no reply is received by 13th November 2024, it will be assumed that you have no observations and a decision may be taken on the pre-application enquiry.

Please remember to e-mail the DCConsultees Mailbox when you have inserted your reply into Idox.

Name of Applicant: SP Transmission PLC

Agent: Scottish Power Energy Networks

Nature of Proposal: Reinforcement connection project

Site: Land To West Of Netherfield Upper Blainslie To Land South Of Kershopefoot
Newcastleton Scottish Borders

OBSERVATIONS OF: Environmental Health

PRE-APPLICATION CONSULTATION REPLY – 13th November 2024

At this early stage, very little information is available as the route has not yet been confirmed. In order to protect existing residential amenity, the applicant should consider the potential impacts associated with the development, including those identified below.

- Impact on residential amenity during the construction phase e.g. noise, vibration, light, air quality.
- Impact the construction of the development may have on private water supplies.
- Impact on residential amenity during the operational phase e.g. noise.

PRE-APPLICATION CONSULTATION

To: Ecology Officer

From: Development Management

Date: 23rd October 2024

Contact: Kyle Wise 📞 Ref: 24/01012/PREAPM

PRE-APPLICATION CONSULTATION

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Nature of Proposal: Reinforcement connection project

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Newcastleton Scottish Borders

OBSERVATIONS OF: Ecology Officer

PRE-APPLICATION CONSULTATION REPLY

Date of reply: 24/10/2024

The following high-level constraints have been identified in relation to biodiversity and habitats

- The river Tweed SAC and SSSI

And, from North to South:

- Moorfoot Hills SAC- designated for blanket bog and dry heath habitat
- Moorfoot Hills SSSI- designated for its breeding bird assemblage and breeding Golden Plover
- The ancient Woodland on the South bank of the Tweed opposite Thornielee
- Williamhope SSSI between Peel Moor and Glenkinnon Burn (between Ashiel Hill and the Southern Upland Way) – designated for Lowland calcareous grassland, Lowland dry heath and Springs (including flushes)
- The ancient woodland on both sides of the A708 west of Yarrowford
- Alemoor West Loch and Meadow SSSI- designated for Floodplain fen and vascular plant assemblage
- Slaidhill Moss SSSI – designated for the non-vascular plant and bryophyte assemblage
- Whitlaw and Braxholme SAC – designated for base-rich fens, slender green feather-moss and transition mire and quaking bog
- The ancient woodland at Roughly burn, west of Hermitage Castle road junction.
- The ancient woodland on the west bank of the Liddle Water at Leahaugh Cottage.

- Burnside Moss Local Biodiversity Site – north-west of Leahaug Cottage
- Langholm – Newcastleton Hills SPA and SSSI – designated for (amongst others) Hen Harriers
- Ancient woodland at Tinnis Burn
- A large woodland creation proposal on the hill between Newcastleton and the SPA.

An Ecological Impact Assessment (EclA) should be carried out for the proposed route, including of all access routes and material storage areas as well as an appropriate buffer.
The EclA should provide information on protected species, breeding birds, habitats and vegetation (incl. GWDTE) and peat depth and condition.

Pollution Prevention will be very important.

A plan of the proposed biodiversity enhancements (whatever would be required on top of compensation) should be submitted with any planning application.

PRE-APPLICATION CONSULTATION

To: Access Officer

From: Development Management

Date: 23rd October 2024

Contact: Kyle Wise ☎ Ref: 24/01012/PREAPM

PRE-APPLICATION CONSULTATION

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Name of Applicant: SP Transmission PLC

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Nature of Proposal: Reinforcement connection project

Site: Land To West Of Netherfield Upper Blainslie To Land South Of Kershopefoot
Newcastleton Scottish Borders

OBSERVATIONS OF: Access Officer

PRE-APPLICATION CONSULTATION REPLY

Thank you for consulting Outdoor Access in relation to the Reinforcement Connection Project proposal.

General Access Rights

The Land Reform (Scotland) Act 2003 (LRA) introduced a right of responsible public access to most areas of land and inland water in Scotland. Scottish Borders Council has a statutory duty to uphold these rights on paths, tracks and areas of open ground. There are, of course, certain exceptions where access rights are not exercisable. In addition, s.3 and 14 introduced a reciprocal obligation for land managers to manage land and water responsibly for access. A brief outline of land managers' responsibilities includes;

1. Respect access rights in managing your land or water;
2. Act reasonably when asking people to avoid land management operations;
3. Work with your local authority and other bodies to help integrate access and land management; and
4. Take account of access rights if you manage contiguous land or water.

Scottish Planning Policy 11: Open Space & Physical Activity states; "Access rights and core paths plans are material considerations in determining applications for planning permission. Access authorities have a duty to uphold access rights over most land and inland water, not just on paths. Planning authorities should consider attaching appropriate conditions to ensure continuing public access. New development should incorporate new and enhanced access opportunities where appropriate".

Core paths, Public Rights of Way and promoted paths

According to the records held in the Scottish Borders Council Outdoor Access there are Core paths and rights of way on these areas of land. There are promoted paths which are generally also Core paths. However, please note that Scottish Borders Council does not have a definitive record of every claimed right of way within its area. The Scottish Rights of Way and Access Society, the various community councils and local residents may have evidence of existence of claimed rights of way that have not yet been recorded by SBC.

Depending on the detailed plan the proposal may affect tracks and paths used by some of the following routes.

UK National Trail – Southern Upland Way

Scotlands Great Trail Cross Borders Drive Road, Roman and Reivers

Local paths networks paths around towns etc including Tweed Valley multi-use paths

Paths around Innerleithen, Hawick and other local path networks such as Ettrick and Yarrow valley paths and Robertson paths.

There are locations of some long distance routes in this wider area where there is no alternative track currently available without significant diversion e.g. due to forestry and hill ground. Therefore the timing of work where closure or diversion of a route in relation to popular recreational routes would be relevant.

Use of Access Tracks

Over and above rights of way, the LRA provides for a right of responsible access to much of the land in this area. Tracks to accommodate construction or service vehicles should, therefore, be available for all types of non-motorised recreational users (pedestrians, equestrians and cyclists) after construction is complete. The legislation, of course, excludes land under construction as 'building, civil engineering or demolition works'. Therefore, where any access tracks pass through or nearby the development area, it may be useful to provide boards on site detailing development information and information on routes that are accessible and those routes that are temporarily closed due to development. This would assist safe management of the sites.

Local Festivals

In the Scottish Borders the local Horse-riding events – Common riding events are important festivals.

The routes used by the horse-riders on these annual events would be relevant to the timing and location for the planning of any work on tracks or land that may cross the locations used for the events.

Other cycle and other events may also require liaison at the time of work if diversions or path closures were required.

Locations of interest

Some hill summits and ridges are also locations of interest where the public have an interest to visit whether or not on a specified path. Identification of some priority viewpoints and locations for access would be appropriate.

Depending on the route involved Bow Broch, Torwoodlee Broch, The River Tweed and Teviot and tributaries, Minch Moor, Cauldcleuch Head and Maidens Paps would be some but not all of the locations of interest for the public to access.



(and subsequent restocking) areas needs to be presented in the form of LTFP amendment.
<https://forestry.gov.scot/support-regulations/felling-permissions>

In some circumstances, the woodlands affected by the development may still be affected by Live grant contracts (duration 20 years) Where this is the case, in addition to compensatory planting, SF will need to consider recovery of grant paid out to the landowner to establish the trees. As part of that process, we would also have to consider whether the remaining woodland continues to be UKFS compliant. In the event that it is not, then the full grant may need to be reclaimed. It is important to consider younger woodlands that may be adversely impacted by the development in that context.

Please don't hesitate to contact me if you have any questions regarding Scottish Forestry's response.

Yours sincerely

Neil Murray

Conservator
South Scotland Conservancy