

Torfichen Energy Park Grid Connection

Pre-application Consultation and
Engagement Strategy

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Glossary

Term	Definition
CSE	Cable sealing end
EIA	Environmental Impact Assessment
ECU	Scottish Government Energy Consents Unit
Electricity Act	The Electricity Act 1989
Holford Rules	Guidelines developed by the late Lord Holford in 1959 for routeing overhead lines
kV	Kilo-volt capacity of an electricity power line
OHL	Overhead line: an electric line in the open air and above ground level
PAC	Pre application consultation
PAC Notice	A Notice to be submitted to ECU. To be issued to ECU, Local Authorities, Local MP & MSPs, Local Councillors & Community Councils
PAC Strategy	Document to be submitted to ECU detailing how TO intends to progress multi-stage consultation
Preferred Route	The preferred route identified through the siting study process
Proposed Route	The amended proposed route which will go forward to Environmental Appraisal
RCD	Routeing Consultation Document
Section 37 (s37) application	An application for development consent under Section 37 of the Electricity Act
SPEN	ScottishPower Energy Networks
SPT	ScottishPower Transmission
TEP	Torfichen Energy Park
TO	Transmission Owner and licence holder under the Electricity Act 1989.
UGC	Underground cable circuit

01.

Introduction

1. Introduction

1.1. Purpose of the Report

- 1.1.1 As transmission licence holder for southern Scotland, SP Energy Networks (SPEN) is required under Section 9(2) of the Electricity Act 1989 to develop and maintain an efficient, co-ordinated and economical system of electricity transmission. SPEN is required, in terms of its statutory and licence obligations, to provide for new electricity generators wishing to connect to the transmission system in its licence area. SPEN is also obliged to make its transmission system available for these purposes and to ensure that the system is fit for purpose through appropriate reinforcements to accommodate the contracted capacity.
- 1.1.2 This document outlines SPEN's approach to pre-application consultation and engagement for Torfichen Energy Park (TEP) grid connection. It sets out the strategy for engaging with local communities, statutory and non-statutory stakeholders and other interested parties. The aim is to ensure that stakeholders are informed about the project and have the opportunity to contribute to its development.
- 1.1.3 In May 2025, the Energy Consents Unit (ECU) published 'Electricity Act 1989 pre-application consultation and engagement guidance for electricity transmission line projects which require Environmental Impact Assessment' (S37 PAC Guidance).¹ This document recommends how ECU would like Transmission Operators to undertake Pre application Consultation (PAC) for these type of projects, and in section 3, it describes the drafting and submission of a PAC Strategy in alignment with this guidance.
- 1.1.4 SPEN attaches great importance to the effect that its works have on the environment and on people. In seeking to achieve 'least disturbance', SPEN is keen to engage with key stakeholders including local communities and others who may have an interest in the project. This engagement process begins at the early stages of development of projects to ensure that the project design balances the views of the stakeholders and communities with SPEN's statutory obligations.
- 1.1.5 The document sets out how SPEN intends to progress the multi-stage consultation in accordance with S.37 PAC Guidance. This includes specific details of the planned stages of consultation, setting out clearly what is to be consulted on at each stage of planning and design and any areas of specific feedback sought. Furthermore, the document provides links to where further information is available and contact information for those seeking further details of the project and consultation process, ensuring the public and other bodies are fully informed and aware of the proposed project.

1.2. SP Transmission's Duties and Licence Obligations

¹ See [*Electricity Act 1989 pre-application consultation and engagement guidance for electricity transmission line projects which require Environmental Impact Assessment \(May 2025\)*](#)

- 1.2.1 SP Transmission plc (SPT), the Transmission Owner (TO) and Licence Holder under the Electricity Act 1989 is responsible for the electricity transmission network in central and southern Scotland. As the holder of a transmission licence under the Act, SPT is subject to a number of statutory duties and licence obligations. These include a requirement *“to develop and maintain an efficient, coordinated and economical system of electricity transmission.”*. This requires SPT to provide for new electricity generators wishing to connect to the transmission system in its licence area; to make its transmission system available for these purposes; and to ensure that the system is fit for purpose through appropriate reinforcements to accommodate the contracted capacity.
- 1.2.2 In addition, in formulating proposals for network reinforcements or grid connections such as that proposed for the TEP grid connection, SPT is subject to duties under Schedule 9 of the Act: *“(a) to have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and, (b) to do what it reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.”*
- 1.2.3 SPEN acting on behalf of SPT, is undertaking further work in order to connect the TEP to the transmission network. This work is undertaken in accordance with SPT’s statutory duties and licence obligations with the objective of ensuring that the grid connection is technically feasible, economically viable and on balance, causes the least disturbance to both the environment and the people who live, work and enjoy recreation within it.

1.3. Overview of the project

- 1.3.1 As stated above, SPEN has a legal duty under the Electricity Act 1989 to provide grid connections to new electricity-generating developments and has been contracted to provide a connection from the proposed TEP substation, located approximately 5km south of Gorebridge (in Midlothian), to a proposed cable sealing end (CSE), located approximately 2 km west of Oxton in the Scottish Borders, as illustrated in figure 1. The distance between the proposed TEP substation and the CSE is approximately 15 km. However, the final connection length will depend on topography, designations and routeing through areas of residential properties. The ratio of OHL to UGC is not known at this stage.
- 1.3.2 It should be noted that a separate grid connection from Longcroft Wind Farm (now called Glenburnie Wind Farm) will connect to the same cable sealing end compound associated with this project. This project, along with a proposal to replace the existing 132kV overhead line between the Dun Law Extension Substation, near Oxton, and the Galashiels Substation means that there is a potential for overlapping projects in this area and associated cumulative impact. As such the routeing considerations will take into account the other projects in order to reduce potential impacts.
- 1.3.3 The new transmission connection is proposed to include a 132kV wood pole Overhead Line (OHL) and possible underground cable (UGC) circuits. This shall be subject to an application under Section 37 (s37) of the Electricity Act 1989 and deemed planning consent under Section 57(2) of the Town and Country Planning (Scotland) Act 1997. Typical heights for the trident wood poles including insulators are approximately 12 m above-ground height, with a range between 10 m and 21 m. The trident wood poles would support three conductors (wires) in a horizontal flat formation.

- 1.3.4 At this stage, it is considered that the project potentially constitutes an EIA development (under the terms of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017), meaning that any Section 37 application to the ECU has to be accompanied by an Environmental Impact Assessment.

1.4. Approach to Routeing

- 1.4.1 The Proposals will be developed in line with SPEN's Approach to Routeing and Environmental Impact Assessment (2020)². Under the Electricity Act, SPEN is required to balance environmental, technical and economic considerations when selecting a route and this principle informs the approach to routeing and public consultation.
- 1.4.2 After establishing the study area and identifying routeing constraints, SPEN assesses and refines route options, leading to the identification of a Preferred Route. The Preferred Route is then taken forward for consultation. Following consultation and consideration of stakeholder feedback, the Preferred Route is further refined to a Proposed Route for application. The proposed approach to pre-application consultation and engagement set out in this strategy is complimentary to this established approach.

² [SPEN Approach to Routeing.pdf](#)

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Stakeholders

2. Stakeholders

2.1 Stakeholder Engagement

- 2.1.1 Stakeholder engagement, including public involvement, is an important component of the Scottish planning and consenting system. Legislation and government guidance aim to ensure that the public, local communities, statutory and other consultees and interested parties have an opportunity to have their views taken into account throughout the consenting process.
- 2.1.2 SPEN recognises the importance of consulting effectively on proposals and is keen to engage with key stakeholders including local communities and others who may have an interest in the grid connection. This engagement process continues through to the construction of SPEN projects.
- 2.1.3 SPEN's approach to stakeholder engagement for major electrical infrastructure projects is outlined in Chapter 2 of the SPEN document 'Approach to Routeing and Environmental Impact Assessment'. SPEN aims to ensure effective, inclusive and meaningful engagement with the public, local communities, statutory and other consultees and interested parties through four key engagement steps:
- Pre-project notification and engagement: Discussions are undertaken with consenting bodies, planning authorities, and statutory consultees such as NatureScot and SEPA. Early and proactive engagement enables the views of these consultees to inform project design, assessment methodologies and further engagement. It also provides consultees with an early understanding of the likely programme to submission of the application for consent.
 - Information gathering: To inform the routeing stage, information on relevant environmental and planning considerations and proposed data gathering techniques (e.g. for seasonal ecological surveys) is requested from statutory consultees and other relevant organisations.
- 2.1.4 Obtaining feedback on emerging route options: The Routeing Consultation Document (RCD) is prepared to gather feedback on the emerging project details. It will be issued to statutory consultees, and made available on SPEN's website, at Council offices and in public libraries, with its availability advertised in the press. Local exhibitions and/or public meetings may also be arranged.
- The EIA stage: The results of stakeholder engagement are taken into consideration and used to confirm the 'proposed route' for progression to EIA. Further consultation is carried out during the EIA stage, including additional information gathering, and the preparation of a publicly available Screening/Scoping Report which accompany either a 'Request for a Screening or Scoping Opinion' to the consenting authority.

03. Details of consultation and engagement

3. Approach to consultation

3.1. Stage 1: Definition of the Proposed Route

- 3.1.1. This stage includes a routeing study in which a number of route options for the grid connection are identified and assessed taking into account a range of environmental, technical and economic considerations. It concludes with the identification of a preferred route option for the OHL which is then subject to consultation. SPEN is committed to ongoing consultation with interested parties, including statutory and non-statutory consultees and local communities. Responses to the consultation will be evaluated and inform confirmation of a proposed route to be taken forward to Stage 2. Details of the approach to the first public consultation event are set out below.

3.1.2 PAC Event 1

We intend to hold the PAC Event for Stage 1 at the following times and locations. This will be clarified in the PAC Notice to be submitted in January 2026. At this event, relevant technical experts from the SPEN project team will be in attendance, in addition to specialists in specific topic areas, as necessary, such as landscape assessment and ecology.

Date	Location	Time
23/02/26	Oxton War Memorial Hall	3pm – 7pm
24/02/26	MacFie Hall, Heriot	3pm – 7pm

- 3.1.3 The relevant project information that will be available at the event is set out in table 1 below. Given that the Longcroft Wind Farm connection overlaps with this project in terms of its connection into the same cable sealing end compound, the intention is for the public event in Oxton to take place at the same venue and time. This is reflected in a separate PAC Strategy submitted to the ECU for Longcroft Wind Farm Grid Connection.

Table 1: Consultation materials

Material	Description
Routeing and Consultation Document	Details the need for the project, its location, a description of the proposals, and the environmental constraints and the process used to identify and appraise route options.
Consultation Leaflet	An easy-to-read overview of the Proposed Development for the public, designed to help the public understand the scheme to provide informed feedback.
Maps	Visual representations of the proposed route and design for the overhead line to help explain the project.
Information Banners	Pull-up banners to be displayed at public events.

Feedback summary	After each event a summary of feedback will be produced along with SPEN's response.
Feedback Form	Adapt SPEN standard questionnaire, made available online and at in-person events.

- 3.1.4 Online Engagement Opportunities: A dedicated project website (www.spenergynetworks.co.uk/pages/torfichen_wind_farm_connection.aspx) will be live for the duration of the project, where all of the relevant project information documents will be available and a project specific FAQ page. The website will also include opportunities to leave written feedback or raise specific queries for SPEN technical experts, via an online form.

Contact details are provided below:

Email address	Postal address
torfichengc@spenergynetworks.co.uk	Land and Planning Team, SP Energy Networks, 55 Fullarton Drive, Glasgow, G32 8FA.

- 3.1.5 Publication of the consultation will be as follows:

- PAC Notice sent to Energy Consents Unit, Scottish Borders Council, Midlothian Council, Local MP and MSPs, Local Councillors and Community Councils within the study area. This notice to be submitted a minimum of 12 weeks prior to S.37 application submission.
- RCD sent to list of statutory and non-statutory consultees (including those above) inviting comments and notifying them of the public consultation period and events.
- Adverts in the local media, including Midlothian Advertiser and Southern Reporter newspapers 21 days prior to the events.
- Project leaflet with information on the project and public events sent to businesses and households within 2 km of the preferred route 21 days prior to the events.
- Landowners impacted by the preferred route will be contacted directly by the SPEN Transmission Land Team in advance of the publication of the above.
- Updates on the proposal, consultation and project banners and the consultation process will be held on the dedicated project website. This will include links to relevant government guidance and SPEN Approach to Routeing and Environmental Impact Assessment.

3.2. Stage 2 Planning & Design: Definition of the Alignment

- 3.2.1 The same format of public engagement activities undertaken in Stage 1, as detailed above, will take place in Stage 2, where required.

- 3.2.2 In Stage 2, a detailed alignment will be available within the proposed corridor which will be presented, if required, and feedback will be sought on the indicative location of structures and construction arrangements.

3.2.3 PAC Event 2

SPEN will assess the requirement for additional events following the Stage 1 Routeing event (PAC 1). The preferred route is not considered to be significant in terms of length and the impacts on the local environment and amenity of residents are anticipated to be of a nature that can be mitigated and managed successfully. The requirement to hold an event detailing the proposed alignment is currently not identified as necessary for this project, however this will be reconsidered if feedback to the effect that additional events would be beneficial is received during PAC 1.

- 3.2.4 If a PAC 2 event is required, it is anticipated that the public consultation will take place between May and August 2026. Precise details to be confirmed with the ECU in advance and relevant publicity of the event will be undertaken as per the format set out above for the PAC 1 event. The PAC Strategy will be updated to reflect the proposed approach to consultation at this stage, i.e. whether a PAC 2 event to seek feedback on a detailed alignment is considered necessary.

3.2.5 PAC Event 3

SPEN will undertake a third round of formal consultation in order to present the finalised proposal before a S37 application is made. This event will summarise the final proposals that are intended to form the section 37 application. This event will provide details of SPEN's response to earlier stages of consultation and engagement and will set out the proposed scope of the final proposals.

- 3.2.6 The requirement for duplicate events at this stage will be assessed throughout the consultation process, although it is anticipated that a single PAC 3 event to present the proposals is likely to be sufficient in this case. The event will be advertised in advance, as per the general process for PAC 1. At this stage, it is not possible to be precise about the proposed date for this event, although it is currently anticipated to take place in August 2026.

- 3.2.7 Further feedback is not sought at this PAC 3; however, advice will be provided on how formal representations may be made to Scottish Ministers during the section 37 application process.

3.3. Project timeline

- 3.3.1 Table 2 (below) provides a summary of the project timeline from identification of the project to submission of Section 37 application.

Table 2: Project timeline

Step	Description	Indicative Date
Definition of routeing strategy	Establishing routeing objective, study area and identifying routeing constraints and considerations.	August 2024
Application of routeing strategy	Identify, assess and refine route options. Identify a Preferred Route Option and prepare Consultation Routeing Report.	August 2025 – January 2026
PAC Strategy	Set out stages of consultation in strategy.	December 2025
PAC Notice	Preparation and submission of PAC Notice.	February 2026
Stage 1 Planning and Design: Definition of Proposed Route	Pre-application Consultation Event 1 (PAC Event 1) to gather feedback on Preferred Route option.	February 2026
Stage 2 Planning and Design: Definition of the Alignment	PAC Event 2 to present and gather feedback on Proposed alignment (if required) PAC Event 3 to present finalised proposal	May – August 2026
PAC Report	Sets out what consultation and engagement has been undertaken – submitted with Section 37 application	Sept 2026
Application submission	SPEN will submit an application under Section 37 of the Electricity Act 1989.	Sept 2026

3.4. Consultation materials

3.4.1 In line with Scottish Government guidance, information provided throughout the consultation will be accurate, easy to understand, accessible and relevant. All information will be provided in good time and in an appropriate format. As a minimum the following information on the project will be made available on the SPEN website:

- PAC Notice and PAC Strategy
- The reasons/need for the project
- Benefits of project
- How the project has been identified and by who
- Project location and description of proposals
- Potential environmental effects and constraints

- Information on process used to identify and appraise alignment options
- Contact information
- Feedback methods
- Summary of feedback and SPEN's response
- Frequently asked questions
- All materials provided at consultation events.

3.4.2 The consultation materials will be developed to ensure this information is included. Table 1 at paragraph 3.1.3, above, provides an overview of the materials that will be produced for the public consultation event required for PAC 1.

3.5. Communication and promotion methods

3.5.1 To ensure strong awareness and participation in the public consultation, we will use a range of targeted communication methods:

- **Leaflet distribution:** clear, concise leaflets will be created to inform local residents and businesses about the consultation. These will be delivered to properties within a set area from the project;
- **Newspaper advertisements:** in line with statutory requirements, public notices will be prepared and published 21 days before the relevant public consultation event;
- **Stakeholder emails:** using the Stakeholder Map, targeted email communications will be sent to key stakeholders;
- **Project website:** A dedicated project website will be live for the duration of the project, where all of the relevant project information documents will be available.

04. Feedback and Next Steps

4. Feedback and reporting

4.1. Feedback methods

- 4.1.1 Feedback can be provided at the in-person events using a hard copy of the feedback form or by speaking to a member of the team. Following each event, feedback can be submitted to SPEN within the 28-day post-event comments period using the following methods:
- Online copy of the feedback form provided on the website (www.spenergynetworks.co.uk/pages/torfichen_wind_farm_connection.aspx)
 - by email to torfichengc@spenergynetworks.co.uk
 - by post to Torfichen Grid Connection, Land and Planning Team, SP Energy Networks, 55 Fullarton Drive, Glasgow, G32 8FA.

4.2. Next steps

- 4.2.1 The PAC Strategy will be a live document during the pre-application stages allowing for updates and amendments in approach reflecting the need of the project as it develops.
- 4.2.2 Following consultation, a PAC Report will be prepared to accompany the Section 37 application. The report will outline the consultation and engagement activities undertaken, summarise the feedback received and explain how this feedback has been considered in the development of the submitted proposal, including reasons why any matters raised did not influence the final proposal.

APPENDIX A - Figures

Figure 1: Location Plan

