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Perth and Kinross Council,
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By email to developmentmanagement@pkc.gov.uk

18 March 2021

Dear Sirs,

We write with reference to the proposed Kinardochy Reactive Compensation Substation, planning reference 21/00215/FLM. As a conservation charity that owns and manages land at East Schiehallion, we have been examining the plans from the perspective of people who visit Schiehallion to experience its wild qualities. We have focused our comments on how the approach to the design and construction of the proposed development is expected to reduce landscape, visual and ecological impacts.

On the foreseen landscape impacts and proposed mitigation, given part of the Breadalbane-Schiehallion Wild Land Area is in the west/southwest of the study area we are disappointed that a viewpoint from Schiehallion has not been included in the Landscape and Visual Impact Assessment and that a Wild Land Impact Assessment has not been completed. The panoramic photograph from the summit of Schiehallion, included in EIAR Volume 4: Technical Appendix 4.1, shows where the substation would appear in the landscape. However, this visualisation is not an assessment. By contrast, the five viewpoints included as part of the EIAR have each been assessed for visual impact. Failing to provide an assessment and visualisation from the summit of Schiehallion restricts the ability of people viewing this application to understand the potential visual impact on views from Schiehallion.

When this matter was raised by NatureScot, the Applicant expanded the zone of theoretical visibility to include nearby National Scenic Areas and the Breadalbane-Schiehallion Wild Land Area. Figure 4.4a shows the substation will be visible along the Schiehallion core path from the summit to about half-way down the hill. Figure 4.4b, which maps visibility of the proposed permanent towers in addition to the proposed substation, clearly shows that new development will be visible along most of the Schiehallion core path. The extent to which the visibility of the proposed development from Schiehallion interferes with the ability of people to experience this part of the Wild Land Area will depend on how well visual impacts can be mitigated through design. Our comments below focus on the mitigation and design of the proposed development.

We commend the developer for how the design of the proposed substation has sought to reduce its visual impacts in the landscape. From the application documents we understand that the reactive power compensation substation buildings, infrastructure and electrical equipment will be set below existing ground level so that although the tallest structures at 15.5m are expected to be the Gas Insulated Switchgear and Control building, their construction within an excavated hole means their prominence in the landscape will be reduced. From the top of Schiehallion, we expect the full

footprint of the substation to be visible, including tracks and the associated development, but, as a result of being built below ground level, we would expect the substation to look less prominent in the surrounding landscape. The visual impact could be further reduced by the choice of construction materials, for example natural stonework could enclose the Gas Insulated Switchgear and control building and the STATCOM building. A natural vegetation covering for the STATCOM building and Gas Insulated Switchgear and control building could help these structures blend into the landscape when viewed from above. The covering does not need to be attached to the structure itself if this would increase fire risk and reduce safe operation or maintenance. It could be free standing, overarching above the structure, which would cover the building from view but not insulate it nor be a barrier to accessing the building for operations or essential maintenance.

On mitigating the ecological impacts of the proposed development, we commend the native woodland planting plans around the site's periphery; that areas felled temporarily to enable construction will be replaced as mixed species native woodland; and the creation of 9 hectares of upland oak and birch woodland at Dun Coillich to compensate for the permanent loss of 7.57 ha of woodland during construction. We recommend that Scottish provenance trees should be used. We also commend the approach taken to modify the shape of the construction compound and laydown areas to avoid direct impacts on blanket bog. The Site Reinstatement and Landscape Design Specification is welcomed, in particular the restoration that will result in mixed woodland and wetland scrub on the northern edge of the proposed substation, scrub woodland at the southern edge and dry dwarf heath at the construction compound. We hope this and the Construction Environmental Management Plan will be fully and carefully implemented and look forward to hearing your response to our comments as soon as possible.

Yours faithfully,

John Muir Trust