This objection is submitted by Strathglass Community Council on behalf of its members and local residents, in relation to planning application **25/00592/FUL**, proposing the construction of a new **400kV / 132kV substation and associated infrastructure** at **Bingally**, near **Tomich.**

This objection is submitted on behalf of affected community members, including local business owners who are extremely concerned about the irreversible environmental, landscape, ecological, amenity, and procedural implications of this proposal. It is based upon a review of the planning documents and an assessment of their relationship to relevant national and local planning policies, including:

* **National Planning Framework 4 (NPF4)**,
* The **Highland-wide Local Development Plan (HwLDP)**,
* Scottish Government guidance on climate change, biodiversity, and landscape protection,
* And procedural fairness in public consultation and statutory obligations under the **Electricity Act 1989**.

This objection sets out compelling and objective grounds for refusal by the Highland Council

Firstly, and fundamentally, SCC and the local residents who have expressed strong opinions on the matter, it is clear that a full EIA should have been required for this project. Highland Council’s acceptance that an EIA was not required, has resulted in document submissions which do not meet the regulatory requirements that would have been in force had the EIA been mandated. SCC members and residents cannot understand how a proposed development so close to the NNR, SPAs, SSSIs and an RSPB nature reserve could have been excluded from requiring an EIA. This approach limits the scrutiny and legal standing that would otherwise be afforded under full EIA procedures.

This decision is itself a point of concern, given the project's scale, permanence, and location within a high sensitivity landscape, which we would argue should have warranted a formal EIA at scoping stage under standard thresholds for transmission infrastructure. The access track lies within the Corrimony RSPB Reserve and the site itself is in very close proximity to national recreational assets, Glen Affric National Nature Reserve, Glen Affric SSSI, SPA and various watercourses, and within an area containing peatland.

The proposal is framed as part of the National Developments identified in National Planning Framework 4 (NPF4), which includes electricity grid enhancements. However, the Highland location — remote, wild, and within a fragile environmental setting — has not been demonstrated to be the only viable siting option. The Strategic Justification presented within the application is generic and lacks any explanation as to why this specific location is the most appropriate for a development of such industrial scale.

In particular, the proposal fails to consider:

* The cumulative impact of adjacent transmission infrastructure and substations already operating or proposed within the Highland region;
* Alternative brownfield or less environmentally important sites, where protected species are known to be present;
* The lasting visual, ecological, and cultural damage associated with developing this site.

As such, the development, while part of a national programme, does not sufficiently justify the irreversible localised harm it would introduce to the Highland environment, communities, and tourism assets.

Conflicts with Planning Policy

The proposed Bingally Substation development is in direct conflict with several key policies at both the **national** and **local** levels. While the applicant attempts to frame the proposal within the broader ambitions of energy transmission under **National Planning Framework 4 (NPF4)**, the development fails many critical policy tests, particularly where these relate to environmental protection, landscape safeguarding, public amenity, and sustainable siting.

**NPF4** came into effect in February 2023 and forms part of the statutory development plan. Although it promotes low-carbon infrastructure, it does so with a clear hierarchy of environmental obligations.

Relevant conflicts include:

* Policy 1 – Tackling the Global Climate and Nature Crises
	+ This policy places equal weight on the climate emergency and nature crisis.
	+ The proposed development would result in land-take within natural habitats, and in construction disturbance across wide swathes of upland terrain, including the Corrimony RSPB reserve and disturbance of peatland and hydrology, undermining climate resilience and natural carbon sinks.
	+ The developers own EA volume 2 figure 9-3 shows a number of recorded black grouse breeding sites within the site boundary, with further red listed birds in figure 9-4A-C.
	+ The permanent substation site is lies within meters of the mapped boundary of the Glen Affric National Nature Reserve and is in close proximity to the Glen Affric to Strathconon SPA.
* Policy 3 – Biodiversity
	+ Policy 3 requires proposals to both protect, and to deliver positive effects for, biodiversity.
	+ There is no evidence in the application of protecting biodiversity or providing any measurable biodiversity gain. Instead, the project entails loss of habitat, risk to protected species in particular Black Grouse, and indirect impacts to surrounding ecological networks, including those associated with the Glen Affric National Nature Reserve (NNR).
	+ The site lies within a habitat-rich corridor (as demonstrated within the EA maps, the presence of Black Grouse, other red listed birds and mamals including the water vole and by the proximity to the NNR) and includes temporary diversions of core paths that would further interrupt wildlife corridors.
* Policy 4 – Natural Places
	+ The policy directs that proposals must avoid fragmentation and degradation of natural habitats, particularly within wild, remote areas.
	+ The site selection process has not demonstrated avoidance of such areas as described above, and in fact, the development cuts through a well-used recreational landscape with natural qualities integral to the Highland identity.
	+ The site selection process appears to have ignored the requirement to incorporate measures to increase biodiversity, including populations of priority species. Instead, as the application shows, the access track and substation site if consented will directly impact priority species.
* Policy 5 – Soils
	+ This policy identifies peat and carbon-rich soils as nationally important.
	+ Supporting material within the application indicates disturbance of peat deposits. The proposed access track construction, SuDS basins, and platform works all involve excavation and drainage which is likely to lead to oxidation of peat and loss of stored carbon.
* *Policy 6 – Forestry, Woodland and trees*
	+ This policy intends to protect and expand forests, woodland and trees.
	+ The proposed access track construction would require the felling of ancient woodland. The proposed substation site would also require the felling of trees and although it is proposed that some new planting, will take place, this will neither replace the visual amenity and health benefits (for local people and visitors) of being in woodland nor enable resilience to climate change.
* Policy 11 – Energy Infrastructure
	+ This policy states that such developments may be supported only where they avoid unacceptable impacts on communities, nature, and sensitive landscapes.
	+ The Bingally proposal fails this test due to:
		- Its proximity to recreational routes,
		- Lack of landscape mitigation,
		- Poor visual screening opportunities in open moorland settings,
		- And its conflict with multiple other NPF4 policies including those noted above.

The proposal is also in conflict with the **Highland-wide Local Development Plan**, particularly the following policies:

* Policy 57 – Natural, Built and Cultural Heritage
	+ This policy places constraints on development that would affect features of local/regional importance unless it can be demonstrated that public benefit clearly outweighs the harm.
	+ No such justification is convincingly made for the selection of this proposed site. The environmental harm includes habitat degradation, recreational disruption, and visual intrusion in a high-value landscape
	+ This policy relates to features of local, regional and national importance, and indicates that these will only be allowed if it can be shown that not to compromise the natural environment, amenity and heritage resource. This site encompasses or is in close proximity to many of these including the Glen Affric SSSI and the Glen Affric to Strathconon SPA, SPB Corrimony, the Corrimony Cairn National Monument and Comar Wood Dun.
	+ This policy also states that it must also be shown that the development will support communities in fragile areas who are having difficulties in keeping their population and services. Such a development with its noise impacts, traffic impact and visual impact will likely lead to further depopulation which would threaten the viability of local schools.
* Policy 58
	+ This policy states that development which is likely to have an adverse effect, individually or cumulatively on European Protected Species will only be permitted under three conditions, none of which we consider to have been evidenced within the application.
	+ Black grouse and other species including crossbill, lesser redpoll and skylark which are shown to be present and breeding within the proposed site boundary in Volume 2 Figure 9-4 of the EA are a European Protected Species under the EU Birds Directive. Black grouse were already adversely affected by the recent Cannich/Tomich 2023 wild far and the remaining birds are shown to nest within the proposed site boundary.
	+ Otter and water vole, which are both protected species are recorded within the site boundary (Volume 2 Fig 8-5 A-E)
	+ Golden eagles were not identified as being present within the survey but they are known to breed, nest and incubate in the area, as identified within the separate Loch Liath windfarm proposal which is next to the proposed site. Golden Eagles are another European Protected Species.
* Policy 61 – Landscape
	+ Requires development to reflect the existing character and sensitivity of the landscape.
	+ The proposal introduces industrial-scale infrastructure into a previously undeveloped, remote, and sensitive upland setting. The impact on local landscape character is demonstrably severe. In particular, the proposed substation would be visible from within the Glen Affric SSSI and Affric to Strathconon SPA, as well as being only meters away from the Glen Affric NNR.
* Policy 77 – Public Access
	+ The proposal affects recognised public access routes, including the Affric-Kintail Way, and two core paths.
	+ While diversions are proposed, they are temporary, disruptive, and located in areas where route character and experience will be diminished during the multi-year construction phase.

The Voluntary Environmental Appraisal and Planning Statement fail to provide robust justification for the selection of this specific site. There is no analysis of alternative locations, no demonstration that a brownfield or lower sensitivity site was available or explored in depth, and the strategic need is stated in general terms without mapping onto local planning constraints.

This absence of a robust site selection process, combined with the substantial environmental and community impacts, places the development outwith the spirit and letter of policy compliance.

**Landscape & Visual Impact**

The proposed Bingally Substation constitutes a substantial and permanent alteration to a high-value, rural Highland landscape. The site and surrounding area are characterised by open moorland, rolling upland terrain, and limited existing development, making the introduction of a large-scale electricity substation particularly discordant. The voluntary EIA provided by the applicant understates the magnitude of the visual and perceptual change.

The application site lies within the Rolling Uplands – Inverness landscape character type (LCT), as defined by NatureScot. This LCT is typified by open, expansive views, rough moorland, and a sense of remoteness. The area has low levels of human infrastructure, contributing to a strong sense of place, valued for its tranquillity and scenic quality.

The proposed development, by contrast, introduces significant industrial infrastructure to this environment: A large platform area; Steel lattice structures and switchgear; High perimeter fencing; Overhead line (OHL) connections, and extensive new and widened access tracks.

These features are industrial in form and scale and sit in stark contrast to the surrounding undeveloped moorland. The introduction of hard, angular built forms will permanently erode the naturalistic qualities of the site.

The Visual Impact documents underrepresent the true extent of visual change. Key concerns include:

* Underrepresentation of viewpoints: Several sensitive locations, including vantage points along the Affric-Kintail Way, were either omitted from assessment or assessed without sufficient rigour.
* Inadequate photomontages: The visualisations provided are limited and taken during leaf-on conditions, failing to reflect winter views when screening vegetation is reduced.
* False impression of mitigation: While minor topographical screening exists, the size and height of the substation components exceed what can be screened by landform or planting in the short or medium term.

Critically, the proposal directly affects recreational routes and the perception of wildness, which are key contributors to the area's landscape value and enjoyment of such.

* Affric-Kintail Way: A nationally recognised long-distance walking route that passes close to the site. The construction works, substation footprint, and associated vehicle activity will severely degrade the experience of users, both during construction and permanently thereafter.
* Core Paths IN05.02 and IN05.03: These designated paths will require temporary diversion, yet even after reinstatement, the character and visual amenity of the routes will be irreparably altered.
* Loss of Perceived Naturalness: The area currently possesses attributes of wild land character, including natural landcover, lack of built features, and visual remoteness. This will be fragmented and undermined by the substation and related works.

The applicant’s assessment fails to adequately account for cumulative impacts with countless other energy related proposals in the immediate vicinity. If this development and others nearby are consented, there will be no respite from industrialised landscapes in this area of the Highland.

The Highland Council has previously raised concerns regarding the progressive industrialisation of upland areas, particularly where cumulative energy infrastructure pressures are not being strategically managed. The Bingally proposal contributes to this creeping encroachment.

This development, due to its scale, location, and visual prominence, results in an unacceptable level of landscape and visual harm, in direct conflict with the following:

* NPF4 Policy 4 (Natural Places),
* NPF4 Policy 6 (Design, quality and place),
* Highland LDP Policy 61 (Landscape), and
* Scottish Government’s general principles on sustainable siting of major infrastructure.

**Ecology & Biodiversity**

The proposed Bingally Substation site lies within a sensitive upland environment, supporting a range of habitats and species protected under Scottish and UK legislation. The Environmental Appraisal (EA) fails to demonstrate that the development will avoid significant adverse effects on biodiversity, and does not satisfy the legal and policy requirement to deliver positive effects for biodiversity, as required under NPF4 Policy 3.

The development will result in the direct loss of natural and semi-naturalhabitats, including areas which provide ground nesting sites and are home to protected species including: RSPB reserve; Moorland and upland heath; Wetland and water-dependent vegetation; Woodland and precious peatland areas.

Earthworks to form the substation platform, SuDS ponds, and extensive access tracks will result in permanent conversion of habitat to hardstanding, with further degradation likely from dust deposition, hydrological changes, and construction activity over a prolonged period.

No evidence is presented that compensatory habitat creation will offset the scale and ecological value of what is being lost. Moreover, no biodiversity net gain calculation has been submitted, and there is no suitable plan for ecological restoration post-construction.

It is likely that species of lichen present locally due to clean air will be destroyed by the pollution arising from the development.

Impact on protected species:

The site and surrounding area are known to support a variety of protected and notable species, including:

* Water voles
* Lizards
* Adders and Slow worms
* Otter (Lutra lutra) – a European Protected Species (EPS), recorded in nearby watercourses;
* Pine marten (Martes martes) – protected under Schedule 5 of the Wildlife and Countryside Act 1981;
* Red squirrel (Sciurus vulgaris) – a priority species under the UK Biodiversity Action Plan;
* Various bat species, likely to be present in woodland fringes and affected by lighting and tree clearance;
* Ground-nesting birds, including species listed in Annex I of the EU Birds Directive, particularly vulnerable to disturbance during the construction period.

The voluntary EIA does not include sufficient survey data to confirm the presence, absence, or behaviour of these species across seasons, and thus fails the test of adequate ecological assessment under national policy and licensing requirements. No licence applications under the Conservation (Natural Habitats) Regulations 1994 are mentioned or prepared.

The development footprint includes areas of wet ground and watercourse crossings, notably where new or widened access tracks intersect with sensitive drainage systems.

* Alteration of hydrological flow patterns during construction risks drying out or flooding of dependent habitats;
* Sedimentation and pollution risk to aquatic habitats is insufficiently mitigated by the generic SuDS designs proposed;
* Drainage interventions may have knock-on effects on downstream wetland ecology, with no catchment-scale assessment provided.

These issues conflict with:

* NPF4 Policy 3(c): Protecting ecosystem functionality,
* NPF4 Policy 4(d): Safeguarding water-dependent habitats,
* And SEPA guidance on peatland and wetland protection.

Cumulative Effects in the Long Term

The applicant does not assess the **cumulative ecological effects** of this development when considered alongside:

* Ongoing upgrades to Fasnakyle Substation,
* Existing Beauly–Denny infrastructure,
* Other energy related proposals in the vacinity

Taken together, these projects threaten to fragment habitat networks, stress wildlife populations, and convert a broad landscape into an ecological dead zone for certain species.

In conclusion, the Bingally Substation proposal:

* Does not comply with legal duties regarding protected species and habitats;
* Fails to demonstrate biodiversity net gain;
* Disregards ecosystem services and functionality;
* And contradicts the principles of NPF4 Policies 1 and 3, as well as Scottish Biodiversity Strategy 2045.

**Cultural Heritage**

The Bingally Substation proposal poses unacceptable risks to the cultural heritage assets of the surrounding Highland landscape. While the voluntary EIA seeks to downplay impacts by focusing narrowly on direct physical intrusion, the proposal undervalues setting, cumulative impacts, and the perceptual relationship between the development and heritage features.

Within the 2 km study area defined by the applicant, multiple designated heritage assets are identified, including:

* Scheduled Monuments,
* Listed Buildings, and
* Areas of archaeological sensitivity.

The voluntary EIA confirms that while no direct physical impacts to scheduled monuments are proposed, visual and contextual impacts on setting are unavoidable. These include visibility from:

* Historic routeways and trackways,
* Agricultural landscapes with high historic continuity, and
* Built heritage structures associated with historic settlement and estate activity.

The proposed development introduces dominant industrial infrastructure into a previously undeveloped landscape, which historically held value for its remoteness and natural integrity. The introduction of metal lattice structures, perimeter fencing, lighting columns, and associated activity alters the cultural landscape context permanently.

The wider landscape surrounding the site retains a strong historic rural character. Historic Environment Scotland and Highland Council have both previously recognised the importance of Highland uplands in understanding the evolution of crofting, forestry, and estate land use.

The development would:

* Visually sever the continuity between surviving traditional elements of the historic landscape;
* Undermine the legibility of prehistoric field systems, shielings, and trackways, which rely on an unaltered setting for interpretation;
* Introduce artificial features that are incompatible with the area's archaeological context.

This is in direct conflict with:

* NPF4 Policy 7 – Historic Assets and Places, which requires that developments protect, preserve, and where appropriate enhance the historic environment;
* Highland-wide LDP Policy 57, which similarly places weight on conserving heritage resources.

The EIA’s appraisal of archaeology relies heavily on existing HER (Historic Environment Record) entries and limited site walkovers. However, upland areas such as this are frequently under-recorded, and the likelihood of subsurface remains or currently unrecorded cultural features being present is high.

Key deficiencies include:

* No indication of geophysical survey or intrusive investigation to establish presence of buried remains;
* Lack of engagement with local archaeological groups or historical societies to supplement official records;
* Over-reliance on desktop sources and walkover survey of limited temporal scope.

This falls short of best practice guidance as set out by Historic Environment Scotland, which recommends early, robust identification of archaeological risk.

The proposed development contributes to a growing cumulative impact from energy infrastructure on Highland cultural landscapes. While each project may argue limited individual effect, collectively they:

* Diminish the authenticity of historic land use patterns,
* Disrupt historic routes and their experiential value,
* Replace historically open or agriculturally used land with a network of modern, industrialised compounds.

This undermines the cultural identity of the Highlands, which is rooted in the integrity of its natural and historic landscapes, particularly in relation to the iconic Glen Affric and its local environment.

The Bingally Substation development therefore results in:

* Degradation of setting for nationally and regionally significant heritage features;
* Risk to unrecorded archaeology;
* A cumulative threat to the historic character of the Highland landscape.

It fails to comply with NPF4 Policy 7 and related national guidance, and does not demonstrate any effort to conserve, enhance, or interpret the historic environment in which it is sited.

**Noise and Amenity Impact upon Residents and Visitors**

The Bingally Substation proposal presents a clear and lasting impact on acoustic character and residential amenity within the surrounding Highland landscape. The site lies in a currently tranquil, low-noise rural environment, and the introduction of a major substation, construction compounds, and associated vehicle movements represents a marked deterioration in baseline noise conditions. The EIA fails to address this impact adequately and insufficient baseline noise measurements were taken, and they were confined to lower level properties in Tomich (despite the offer of hosting equipment at over 100m.

**Crucially, the development plans have not included any physical noise mitigation measures, which is completely disrespectful of residents and visitors to the area.**

The construction phase is anticipated to span multiple years and will involve:

* Heavy plant operations, including excavation, grading, piling, and concrete pours;
* Continuous HGV traffic along new and widened constructed access routes;
* Operation of generators, mobile compressors, and vibratory rollers;
* The establishment and use of temporary construction compounds.

While the EA includes generic references to BS 5228 (Code of Practice for Noise and Vibration Control on Construction and Open Sites), it provides inadequate information regarding construction noise modelling or mapping of predicted noise levels at an insufficient and unrepresesentative number of sensitive receptors.

There is no indication that:

* Baseline ambient noise levels were measured in a seasonally representative manner;
* Nearby receptors, including residences, walkers on the Affric-Kintail Way, or wildlife habitats, were factored into a site-specific impact matrix;
* A construction noise management plan is secured or enforceable via planning conditions.

Given the site’s low background noise and elevated location above the glen and the village of Tomich, even moderate construction noise will be highly perceptible and intrusive, undermining both residential amenity and the natural soundscape valued by users of the public access network.

Once operational, the substation will introduce constant mechanical noise sources into a previously quiet setting, including:

* Transformer hum (typically low-frequency and continuous),
* Cooling systems and fans,
* Auxiliary equipment (such as switchgear and relay units),
* Security lighting and periodic maintenance vehicle activity.

There is no justification of the vague noise modelling maps provided in the application and we have no faith in their veracity. It merely asserts that operational noise will be “low level” and “not significant,” based on unreferenced assumptions. It does not take into account the way that sound travels across the glen. The developer refused to site baseline noise measurement equipment requested by some residents, including those whose properties are in elevated positions opposite the development site.

This approach is unacceptable for a development of this scale. The lack of predictive operational noise contouring, and the absence of a long-term noise monitoring protocol, means the planning authority and public cannot make an informed judgement about compliance with:

* NPF4 Policy 14(f) – which requires avoidance of significant noise emissions and protection of amenity;
* BS 4142 guidance on industrial noise impact in low-background settings;
* And Highland Council’s own environmental health policies, which require developments to preserve the acoustic character of rural settings.

In addition to residential receptors, the site lies immediately adjacent to the Affric-Kintail Way and intersects several core paths. These routes are used by walkers, cyclists, and nature observers, all of whom currently enjoy peaceful conditions, free from industrial activity. It is close to the Corrimony RSPB Reserve, Glen Affric NNR, the Affric to Strathconon SPA and the Glen Affric SSSI, all of which are popular with walkers and hikers.

During construction:

* The experience of these users will be degraded by noise, dust, construction traffic, and visual intrusion;
* Temporary diversions will expose users to site peripheries and plant operation zones;
* Wildlife disturbance (see previous section) will also reduce the quality of visitor encounters with nature.

This loss of tranquillity is especially critical in a Highland setting, where tourism is heavily reliant on the perception of wilderness, calm, and escape.

In summary, the proposal:

* Introduces continuous and intrusive noise sources into a quiet, rural landscape;
* Fails to model or quantify noise impacts for both construction and operation;
* Undermines residential and recreational amenity values;
* Conflicts with NPF4 Policy 14, local environmental health requirements, and established best practice.

The proposed Bingally Substation development introduces significant concerns relating to traffic generation, road safety, access impacts, and the disruption of nationally and regionally significant recreational routes. The site lies in a remote Highland setting accessed primarily via the A831 and a network of narrow, rural tracks. The voluntary EIA underrepresents the scale and consequences of vehicular access requirements, particularly during construction.

The EIA acknowledges that the proposal will generate a high volume of heavy goods vehicle (HGV) movements over an extended construction period, yet fails to provide a detailed construction traffic management plan with secured mitigation.

Key concerns include:

* Daily HGV movements involving delivery of aggregates, plant, steelwork, concrete, and electrical equipment;
* Movement of abnormal loads such as transformers and substation components, requiring special vehicle convoys and potential road closures;
* The use of minor and unclassified roads that were not designed for such traffic, increasing wear and damage risk;
* Vehicle conflicts on single-track sections without regular passing places;
* Absence of modelling for cumulative traffic impacts, particularly given the other ASTI infrastructure works ongoing in the Highland Council region.

The voluntary EIA provides only generic descriptions and assumptions without quantified trip numbers, peak traffic profiles, or worst-case delivery scenarios. It is therefore impossible to assess the likely significance of transport impacts with any confidence.

**The traffic noise and vibration report shows that there will be a significant impact upon those living close to the A831 between Drumnadrochit and Cannich, however there was no SSE consultation event in relation to this proposal in Drumnadrochit or Glenurquart.**

The existing access routes to the site—via the **A831 and minor rural roads**—are narrow, winding, and bordered by natural features including:

* **Watercourses and ditches** with poor protection;
* **Soft verges** prone to degradation under repeated HGV use;
* Sections lacking **formal road drainage**, increasing risk of runoff and pollution.

There is no indication that pre-condition surveys of road conditions have been undertaken, nor that funding has been allocated for road surface maintenance, repair, or upgrading during and after the construction phase.

This exposes Highland Council to the financial and liability risks associated with damage to public infrastructure arising from private development works.

**Access Disruption to Core Paths**

**As identified by the Highland Council’s own Access Manager in their response to the application, there are significant issues regarding access arising from the proposal.**

The development intersects and requires temporary diversion of the following:

* Core Path IN05.02,
* Core Path IN05.03, and
* The nationally promoted Affric-Kintail Way, a recognised long-distance walking route of recreational and tourism significance.

While temporary diversions are proposed, they are:

* Not yet sufficiently detailed within the planning submission;
* Located in areas that bring users into closer proximity to construction activity, noise, dust, and machinery;
* In some cases, redirected over less suitable or steeper terrain, potentially rendering access difficult for families, older walkers, or less mobile users.

This constitutes a functional and experiential loss of access, particularly as the construction period is not short-term, but extends over multiple years. There is no evidence that alternative paths of equal quality or accessibility can be provided.

The proposal therefore fails to meet the requirements of:

* NPF4 Policy 14(e) – protecting public access rights and recreational assets;
* Highland LDP Policy 77 – safeguarding core paths and amenity routes;
* Scottish Outdoor Access Code obligations regarding the integrity of long-distance trails and public enjoyment of the countryside.

**The proposal does not demonstrate any consideration of:**

* **Worker transport by shared means, such as shuttle buses or pooled travel;**
* **Impact of parking provision and informal layby use near the access points;**
* **Potential for conflict with recreational traffic, especially during holiday seasons when the Affric-Kintail area attracts visitors.**

No mitigation is offered to avoid congestion or to preserve public safety during peak periods of both construction and tourism traffic.

**There is also no recognition of the cumulative impact of traffic with logging vehicles or traffic in relation to other local energy related and non-energy related developments.**

In conclusion, the Bingally Substation development would:

* Introduce substantial construction traffic on unsuitable rural roads, impacting upon the amenity of both residents and tourists/visitors;
* Result in safety risks, road degradation, and long-term access disruption;
* Cause functional loss of nationally significant recreational routes;
* And fails to meet both local transport policy and NPF4 transport and amenity standards.

Water Management

The Bingally Substation proposal raises significant concerns regarding surface water management, flood risk, alteration of natural drainage pathways, and impacts on water-dependent ecosystems. The site lies in a high rainfall Highland upland setting, with variable topography and proximity to multiple minor watercourses. The development footprint includes earthworks, impermeable surfaces, culverts, and drainage ponds — all of which may alter baseline hydrology and increase vulnerability to environmental degradation downstream.

**Flood risk assessment is inadequate**

Key deficiencies include:

* No climate change allowances modelled, despite clear guidance that infrastructure lifespans must be assessed under +30% rainfall scenarios;
* No consideration of the cumulative impact of local forestry and this development
* No catchment-wide modelling to understand cumulative drainage impacts, flow rate increases, or downstream risk propagation;
* No confirmation of consultation with SEPA regarding surface water strategy acceptability.

This is in direct breach of NPF4 Policy 22, which requires all development proposals to take a precautionary approach to flood risk and demonstrate climate resilience.

We are also concerned that alterations caused to natural drainage and waterways till :

* Interrupt natural overland flow paths,
* Concentrate runoff in new discharge points,
* Potentially lead to overland flooding during storm events,
* Reduce water infiltration, thereby increasing erosion risk on downgradient land,
* And change water tables in surrounding peatland

No detailed modelling is presented to show how these systems will perform under extreme weather events, nor how degradation or blockage of culverts will be addressed. No monitoring or maintenance plan is presented to mitigate long-term risk.

**Carbon impacts**

The Bingally Substation proposal claims alignment with Scotland’s national net zero objectives. However, closer scrutiny reveals a fundamental disconnect between the long-term emissions targets of the Scottish Government and the immediate, substantial carbon impacts and land use change this project would trigger. Far from contributing meaningfully to a low-carbon future, the development risks undermining key tenets of climate adaptation, resilience, and natural carbon storage.

Despite the scale of the proposed development — which includes extensive earthworks, platform construction, concrete foundations, steel structures, and vegetation clearance — the applicant has not submitted an substantial Carbon Balance Assessment, as recommended by:

* Scottish Government guidance on carbon-rich soils and infrastructure;
* SEPA’s Regulatory Position Statement on developments affecting peatland;
* NPF4 Policy 1 and Policy 5, which expect developments to account for their full climate and carbon consequences.

Without a quantified carbon analysis, the following are entirely unassessed:

* Carbon lost from excavation and oxidation of peat and soil carbon stocks;
* Embodied carbon in concrete and steel used in construction;
* Emissions from construction vehicles, transport logistics, and HGV trips over a multi-year period;
* Long-term maintenance emissions, including plant operation and decommissioning.

This omission is unacceptable for a major energy infrastructure proposal in a sensitive Highland setting.

The proposed substation footprint and access track corridor traverse areas that likely include peat-influenced or carbon-rich soils. While the EIA briefly acknowledges peat, it does not include:

* A full Peat Depth Survey,
* A realistic and specific Peat Management Plan,
* Or a dependable risk assessment regarding peat slide or erosion.

The failure to identify, quantify, or protect these soils directly conflicts with:

* NPF4 Policy 5(b), which treats peat and carbon-rich soils as a nationally important resource;
* The Scottish Climate Change Plan, which recognises the role of peatland preservation in climate mitigation.

Instead of avoiding these areas, the development proposes hard surfacing, excavation, and drainage, all of which compromise the sequestration function of the natural environment.

While the applicant positions the proposal as a necessary part of grid enhancement for renewable energy transmission we are particularly concerned that:

* No site comparison is made to identify less carbon-intensive alternatives;
* No mitigation hierarchy is demonstrated to minimise emissions or avoid carbon sinks;
* The proposal lacks any mechanism to deliver or verify positive climate outcomes locally.

This calls into question whether the development can credibly claim alignment with:

* Scotland’s legally binding 2045 Net Zero target;
* The Just Transition principles;
* And the National Strategy for Economic Transformation, which embeds climate in all infrastructure decisions.

The development is one of many energy related development proposed in the Straghglass area. In combination, these proposals:

* Encroach on large areas of undeveloped, carbon-sequestering land;
* Introduce unmodelled emissions from extensive material use and construction transport;
* Are being advanced with minimal climate oversight, despite their role in reshaping Highland land use patterns.

**Poor Stakeholder Engagement**

The Bingally Substation proposal represents a major infrastructure intervention in a sensitive and valued part of the Highland landscape. However, the application has failed to meet basic expectations of public engagement, transparency, and respect for local community interests. Despite the scale and duration of the proposed works, affected communities and Strathglass Community Council have been marginalised in the planning process, and public access, wellbeing, and amenity have been inadequately considered. At the site selection stage, following a request from the community council, SSEN took months to agreed to accompany members of the Strathglass Community Council to the proposed site and a visit was only arranged once the current site had been selected. No good reason was or has to date been provided for the selection of the site, which is so close to the conservation village of Tomich, the Glen Affric NNR, SPA and SSSI’s.

The EIA references “consultation activities” but provides **no robust evidence** of meaningful, transparent, or inclusive community engagement. Key failings include:

* **Insufficient and poor quality public exhibition or drop-in sessions** within the affected community area; with poor quality maps and staff unable to answer questions
* No acceptable published response to **consultation feedback**, concerns raised, or changes made in response;
* Failure to engage with users of the Affric-Kintail Way and local or regional tourism interests, the socio economic report indicates that the review of tourism was a desk-based exercise using out of date research
* Failure to consult with the residents or business owners of Drumnadrochit or Glenurquart who would be directly impacted by traffic to the site and the reduction in amenity associated with Glen Affric, Plodda Falls and other locations used by residents and the tourists upon which so many small businesses I the area rely.
* Failure to consult with or even to recognise the impact upon tourism businesses in close proximity to the proposed development (which were not even included in SSEN’s desk based review of tourism which contributed to their ‘Socio Economic’ report.

While voluntary EIA processes do not require formal consultation under EIA Regulations, this does not absolve the applicant of its duty to engage with those whose environment, access rights, and quality of life will be directly impacted for years.

This represents a breach of good planning practice, and conflicts with:

* NPF4’s emphasis on place-based planning and community empowerment,
* The Scottish Government’s Planning Advice Note (PAN) 3/2010 on community engagement,
* And Highland Council’s own expectations for early and proportionate local consultation.

**Impact up Recreation and Tourism**

The site lies in close proximity to the Affric-Kintail Way, a nationally promoted long-distance trail that attracts thousands of visitors annually. Additionally, the route intersects with core paths IN05.02 and IN05.03, offering high-quality, tranquil walking and cycling experiences.

The development:

* Requires multi-year diversions of these paths, with no suitable alternatives of equal landscape or amenity value;
* Will subject users to construction noise, dust, machinery traffic, and loss of scenic quality;
* Fails to provide permanent improvements or enhancements to public access upon completion.

There is no recognition of the economic importance of outdoor recreation in the Highland region, particularly in post-pandemic recovery. The Affric-Kintail corridor is an asset to both domestic tourism and local well-being, and its degradation represents a clear loss of public benefit.

This stands in direct contradiction to:

* NPF4 Policy 14(e) – safeguarding public access networks;
* The Scottish Outdoor Access Code;
* And VisitScotland’s guidance on sustaining tourism infrastructure.

There are significant omissions within the Socio Economic report, for instance although it identifies some small Air B&B type holiday accommodation including that some distance away in Cannich, there is no mention of the substantial tourism businesses in Tomich which are closest to the proposed substation itself. For example, Tomich Holidays which provides a number of listed building holiday homes, an eco holiday home together with additional log cabin facilities, is not mentioned at all. Neither is the Tomich Hotel, situated within the village, nor is the Croft at Knockfin.

**These omissions call into question the accuracy of the documents provided to support the application.**

**Other Inconsistencies**

In the full planning statement paragraph 1.3.1, it states that the development site is 1km to the East of the existing Fasnakyle Substation. Whilst Fasnakyle substation may be 1km east of part of the intended access track, it is at least 5/6 km from the intended site of the Substation. This gives a false impression of the nature of the intended substation site, which is actually between the conservation village of Tomich and the Glen Affric NNR. To say that it is within 1km of the existing substation implies that the immediate area is already industrially developed, when it is not.

**1.3.1 also states “**The wider the application boundary associated with the proposed Bingally Substation access track mostly follows the existing overhead line (OHL) corridor at the boundary between woodland and upland moor.” This statement is contradicted later in 1.5.3 which states “Establishment of approximately 9.5 km of access track, comprising upgrade of approximately 3.6 km of existing track and approximately 5.9 km of new track”.

**1.3.1** It also states that the site is not located within any Statutory Designated Sites, but fails to mention that it is only meters from the Glen Affric NNR map boundary and that the planned new access track crosses an RSPB reserve.

**Section 3.1.1** of the planning statementthe Economic Benefits outlined are not qualified as they are in the accompanying socio-economic report. The stated £2.5 million GVA for Highland is not only miniscule compared to the £82.4 million across the UK but in the socio-economic report it states that the £2.5 million figure is contingent upon local contractors being secured. This is questionable given the broader context of energy and housing related developments in the Highland Region and the scarce supply of labour. This casts doubt on an already comparatively low GVA figure for Highland. Similarly, the 22 job years claimed for Highland associated with the development is dwarfed by the 762 years of employment claimed for across the UK.

**Impact on Residents Health Wellbeing and Way of Life**

Although the area around the site is relatively sparsely populated, the residences and crofts nearby are afforded no meaningful protection or compensation. The proposal will expose these households to:

* Years of construction-related disruption, including HGV traffic, dust, and noise;
* Degradation of setting and views, with industrial infrastructure replacing natural scenery;
* Reduced quality of life, especially for those who rely on the area’s tranquillity and recreational offerings.
* Reduced quality of life in relation to the current enjoyment of wildlife and the natural environment – often the reason that people moved to the area, despite the challenges of living in a rural setting
* Significant noise impacts for residents and holiday makers both during construction and operation.
* Fear of potential impact of increased fire risk in an area which experienced the largest wildfire on record in the UK in 2023. There is no operational fire service within 40 minutes of the proposed site and there is only one single track road into Tomich.

**Section 4.4.3** of the planning statementrefers to the National Spatial Strategy to support the delivery of such things as reduced emissions and ‘liveable places where we can all live better, healthier lives’. It is difficult to see how a major industrial development of this scale in a sensitive wild area, having construction traffic polluting an area known for its clean air, nature and hillwalking will make the lives of residents or visitors to Tomich, Cannich, Knockfin or Guisachan either liveable or healthier. Further, the ongoing noise levels associated with the construction and operation of the site will have a detrimental affect on the health and mental health of residents.

There is no mention of community benefit funding, consultation with affected landowners, or any effort to offset the social costs of this proposal.

Moreover, for a project that claims national importance, the applicant has offered nothing to the local community whose environment will be permanently altered.

The Bingally Substation proposal:

* Has failed to carry out meaningful public consultation;
* Has failed to include key tourism business in the socio-economic report
* Shows disregard for recreational users, local residents, and tourism value;
* Offers no mitigatory benefit or enhancement for the affected community;
* And contravenes multiple aspects of national and local planning policy that prioritise community well-being, access, and empowerment.

**OBJECTION**

In summary, this objection has been prepared with the input of the residents of Strathglass within which the proposed development is located. WE HAVE RECEIVED NO POSITIVE COMMENTS REGARDING THE PROPOSED DEVELOPMENT. The development is fundamentally incompatible with its chosen site, insensitive to local environmental constraints, and negligent in its treatment of the community and landscape into which it intrudes. The absence of key environmental assessments, the superficial approach to impact modelling, omissions from and errors within the planning documents and very poor socio-economic impact document, and the disregard for policy compliance make this application unsuitable for approval.

**Accordingly, Strathglass Community Council request that Highland Council reject this application in its entirety.**

**STRATHGLASS COMMUNITY COUNCIL 30/5/2025**