Approach to the EIA

Introduction

- 2.1 The principal aim of the EIA Directiveⁱ is to ensure that the authority granting consent (the 'competent authority') for a particular project makes its decision in full knowledge of any likely significant effects on the environment. The EIA Directive therefore sets out a procedure that must be followed for certain types of project before they can be given 'development consent'. This procedure, known as Environmental Impact Assessment or 'EIA', is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This helps to ensure that the significance of the predicted effects, and the scope for reducing any adverse effects, is properly understood by the public, consultees and the competent authority before a decision is made. Early identification of potentially adverse environmental effects also leads to the identification and incorporation of appropriate mitigation measures into the design of the project.
- **2.2** This chapter sets out the broad approach that has been used in the EIA for the EDM Project. It provides an overview of the key stages that have been followed, in line with EIA best practice.

The Requirement for EIA

- **2.3** As outlined in **Chapter 1: Introduction**, section 37 consent is being sought by SPEN under the Electricity Act 1989 for the New 132kV OHL. Deemed planning permission under section 57 (2) of the Town and Country Planning (Scotland) Act 1997 is being sought for the New 132kV OHL, ancillary development and the decommissioning of the Existing 132kV OHL.
- **2.4** The New 132kV OHL component of the EDM Project falls within Schedule 2 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, as amended (the 'EIA Regulations') as it is development to provide:
 - "(2) an electric line installed above ground-
 - (a) with a voltage of 132 kilovolts or more;
 - (b) in a sensitive area..."
- **2.5** As the EDM Project meets the voltage threshold in (a) and will pass through or in close proximity to sensitive areas (b), it is considered that significant effects on the environment are possible and so EIA is required.
- **2.6** All of the component parts of the EDM Project, i.e. the New 132kV OHL and the decommissioning of the Existing 132kV OHL including all ancillary development, are supported by this single EIA Report. The EIA Report provides an assessment of the likely significant effects of the EDM Project on the environment, both in terms of the construction and operation of the New 132kV OHL, as well as the likely significant effects of the decommissioning of the Existing 132kV OHL. It will therefore support the applications for section 37 consent and deemed planning permission.

The EIA Process

- 2.7 The EIA Report has been prepared in accordance with the applicable EIA Regulations advice and good practice, including:
- Guidance on The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000¹ⁱⁱ
- The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, as amended²ⁱⁱⁱ;
- Planning Advice Note (PAN) 1/2013 Environmental Impact Assessment (Revised in May 2017)^{3iv};
- Planning Circular 1/2017: The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017^{4v}

- Institute of Environmental Management and Assessment (2017) Delivering Proportionate EIA: A Collaborative Strategy for Enhancing UK Practice)^{vi};
- Institute of Environmental Management and Assessment (2016) Environmental Impact Assessment Guide to: Delivering Quality Development^{vii}; and,
- Scottish Natural Heritage (2018) A Handbook on Environmental Impact Assessment: Guidance for Competent Authorities, Consultation Bodies and others involved in the Environmental Impact Assessment Process in Scotland (Version 3)^{viii}.
- **2.8** This EIA Report presents the written output of the EIA process. The information contained in this EIA Report fulfils the requirements of the EIA Regulations and once submitted, will enable Scottish Ministers as the decision-making authority, to make their decisions on the application for section 37 consent and deemed planning permission.
- 2.9 Regulation 5(2) of the EIA Regulations states that the following information is required in the EIA Report:
- a description of the development comprising information on the site, design, size and other relevant features of the development;
- a description of the likely significant effects of the development on the environment;
- a description of the features of the development and any measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- a description of the reasonable alternatives studied by the developer, which are relevant to the development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;
- a non-technical summary of the information; and,
- any other information specified in Schedule 4 of the Regulations relevant to the specific characteristics of the development and to the environmental features likely to be affected.
- 2.10 This EIA Report also includes the information required by Schedule 4 of the EIA Regulations.

Good Practice Guidance

2.11 PAN 1/2013 (Revision 1) provides guidance on EIA good practice, with the key steps to be followed in the EIA process as detailed below. These steps also reflect relevant IEMA^{vi} and Scottish Natural Heritage (SNH) guidance^{viii} referred to above.

Scoping

2.12 Undertake a scoping exercise to establish the scope and level of information to be provided within the EIA Report.

Baseline Studies

- 2.13 Examine, through baseline studies, the environmental character of the area likely to be affected by the development.
- 2.14 Identify relevant natural and man-made processes which may already be changing the character of the site.

Predicting and Assessing Effects

2.15 Consider the possible interactions between the proposed development and both existing and future site conditions.

¹ Whilst the guidance has not been updated for the 2017 EIA Regulations, its content remains largely relevant.

² On 24th April 2020, parts of the EIA Regulations were amended by The Electricity Works (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020 to temporary relax the requirements to place hardcopies of EIA Reports in the public domain during statutory application consultation periods. This was to ensure that the EIA Regulations allowed for compliance with the UK Government's advice during the Covid-19 pandemic whilst allowing for applications to proceed.

³ Whilst this PAN does not directly concern developments consented under the Electricity Act, the guidance contained within it is relevant.

⁴ Whilst this circular does not directly concern developments consented under the Electricity Act, the guidance contained within it is relevant.

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2.16 Predict and assess the likely significant effects, both negative and positive, of the development on the environment.

Mitigation and Monitoring

- 2.17 Introduce design and operational modifications or other mitigation measures to avoid, prevent or reduce, and if possible, offset likely significant adverse effects and enhance positive effects.
- 2.18 Identify any monitoring measures proposed to monitor any significant effects of the development on the environment and/or any applied mitigation measures.

Integration

2.19 EIA should be an iterative process which aims to ensure early consideration of environmental issues at all stages of project development, and is founded on appropriate engagement with planning authorities and the Consultation Bodies. In addition to meeting the requirements of the EIA Regulations, EIA should add value to the design process, improving environmental outcomes and creating a framework for community engagement.

Proportionality

2.20 An EIA should be fit for purpose and must be accessible to the consenting authority, consultees and the public. As such it should focus on significant environmental effects to avoid being overly long in nature.

Efficiency

2.21 Early identification of assessment and information requirements can ensure a coordinated EIA process and can minimise delays.

EIA and the Design Process

2.22 EIA should be treated as an iterative process, rather than a one-off, post-design environmental appraisal. In this way, the emerging findings from the EIA can be fed into the design process, to avoid and reduce potential environmental effects. This approach has been used in relation to the design stages of the EDM Project. Where the potential for significant adverse environmental effects were identified through the routeing and/or overhead line (OHL) alignment stages for the EDM Project or later during the detailed EIA, consideration was given as to how the EDM Project design should be modified to design out these adverse environmental effects, or where this was not possible, to determine appropriate mitigation measures. Post-routeing stage modifications to the scheme design are outlined in Chapter 3: The Routeing Process and Design Strategy and in the subsequent assessment chapters.

Scope of the Environmental Impact Assessment

- 2.23 To determine which aspects of the EDM Project are likely to give rise to environmental effects and to inform the requirements and content of the EIA Report, LUC prepared a Scoping Report^{5ix} which was submitted to the Scottish Government Energy Consents Unit (ECU) on 19th December 2018 together with a request for a Scoping Opinion under Regulation 12 of the Regulations (case reference: ECU00000739)⁶. The Scoping Report set out the components comprising the EDM Project, topics to be assessed, proposed assessment methodologies and mitigation as well as topics to be scoped out of the EIA.
- 2.24 The purpose of scoping is to ensure that the EIA process focuses on the key environmental issues. Therefore, the Scoping Report sought to focus the EIA on the main effects, with each of the topic-based chapters within the Scoping Report setting out a provisional list of significant effects prior to mitigation and a second provisional list of non-significant effects to be 'scoped out' of full assessment. These were drafted on the basis of the findings of the preliminary survey work undertaken, the professional judgement of the EIA team, experience from other projects of a similar nature, and guidance and standards of relevance to the topic area in question.
- 2.25 On this basis, whilst a range of possible effects have been investigated as part of the EIA process, only effects identified as being of likely significance prior to the implementation of the proposed mitigation measures have been addressed fully in the EIA Report.

- 2.26 LUC and the ECU agreed a list of consultees to be contacted as part of the formal Scoping process prior to the scoping request being made by LUC. The ECU contacted these consultees requesting their input to the scoping process.
- 2.27 The Scoping Opinion provided by the ECU (dated 28th February 2019x), and issued on behalf of the Scottish Ministers, included responses from the consultees⁷. Table 2.1 provides a summary of the overarching issues raised by the Scottish Ministers in the Scoping Opinion as well as the individual responses received from the consultees and includes details of how these comments have been addressed in the EIA Report.
- 2.28 In addition to the consultees contacted by the Scottish Government during the formal scoping process, topic area specialists contacted a number of other parties to obtain background information to further inform the EIA and to allow them the opportunity to raise any concerns that they might have in relation to the EDM Project. Details of all relevant consultation are provided in Chapters 6-11.

Topics Scoped Out of the EIA

- 2.29 The Guidance on the 2000 Electricity Works EIA Regulations (although applying to the previous 2000 Electricity Works EIA regulations) provides advice on the general requirements relating to the preparation and content of an EIA Report and states:
- "... the emphasis of Schedule 4 is on the 'significant' environmental effects to which a development is likely to give rise. Some effects may be of little value or no significance for the particular development in question. They will therefore need only very brief treatment to indicate that their possible relevance has been considered."
- 2.30 Furthermore, PAN 1/2013 notes that scoping forms a key part of the EIA process, and that its purpose is to:
- identify the key issues to be considered;
- identify those matters which can either be scoped out or which need not be addressed in detail:
- discuss and agree appropriate methods of impact assessment, including survey methodology where relevant; and
- identify any other project level assessment or survey obligations which may apply.
- 2.31 In line with the guidance outlined above, the work undertaken to date, responses to the consultation exercises, and SPEN's expertise and experience in the construction and operation of developments similar to the EDM Project, where no likely significant effects have been identified for a particular topic these have been 'scoped out' as detailed below. In addition to these topics that have been scoped out in their entirety, some elements of the topics which are assessed in detail have been scoped out of assessment e.g. operational effects on Traffic and Transport and Forestry. Where applicable, this is explained in the relevant chapters of the EIA Report.

Traffic and Transport

- 2.32 The project area is serviced by a number of major and minor roads, which provide access and transport routes to settlements, individual residences and the wider strategic road network.
- 2.33 The construction of the New 132kV OHL and subsequent decommissioning of the Existing 132kV OHL will require temporary access to each wood pole and steel tower location for construction and decommissioning respectively. For the New 132kV OHL, this will involve the use of a tracked excavator and low ground pressure vehicles to deliver, assemble and erect each wood pole structure at each pole location. For the decommissioning of the Existing 132kV OHL, access will be required for tracked excavators and mobile winch, typically attached to a tractor). Wherever feasible, access will be gained from the existing main road network and the use of unclassified roads where required. As the area is crossed by a network of public roads and tracks from which field gates allow access to the majority of the routes, the creation of new temporary stone access tracks is not envisaged, although temporary steel matting may be used in areas of wetter ground conditions and/or sensitive habitat.
- 2.34 Due to the nature, design and rate of construction of the New 132kV OHL (see Chapter 4), it is anticipated that vehicle movements at any one pole location would be limited to three or four visits per day over the course of the construction period which will not lead to any noticeable increase in traffic volumes on the surrounding road network. This is also anticipated to be the case for the decommissioning of the Existing 132kV OHL, albeit there will be a slight change in traffic composition as more HGVs will be required to remove steel towers from each tower location once dismantled. Whilst it is anticipated that 6.0ha of forestry will be felled

⁵ Accessible at: http://www.energyconsents.scot/ApplicationSearch.aspx using case reference: ECU00000739 The Scottish Government ECU administers the issuing of the Scoping Opinion on behalf of Scottish Ministers

⁷ A number of consultees did not respond to the ECU's invitation to comment at scoping. These are listed at Annex A of the Scoping Opinion.

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during construction of the New 132kV OHL, it is not considered likely that this will generate significant levels of forestry HGV traffic across the length of the route, and an assessment of effects on the public road network is not required.

- **2.35** Through consultation and agreement with Transport Scotland, Network Rail, Renfrewshire Council and Inverclyde Council, a Traffic Management Plan (TMP) will be prepared for implementation during the construction phase, and an outline TMP will be included in the EIA. The TMP will include a detailed methodology concerning the crossing of the M8 and railway will include details of any temporary traffic management measures.
- **2.36** On the basis of the short term nature of the construction and decommissioning processes, the geographic spread of the construction and decommissioning works on the public road network and SPEN's commitment to appropriate traffic management, it is considered that there will not be any significant effects arising from traffic and transport on the local road network. This conclusion is one with which both Renfrewshire Council and Transport Scotland agreed. Both organisations considered that an assessment of traffic and transport related effects could be scoped out of the EIA (see **Table 2.1** below).

Construction and Operational Noise

Construction of New 132kV OHL and Decommissioning of Existing 132kV OHL

- 2.37 The EDM Project passes primarily through environments that are relatively rural in nature, comprising agricultural land interspersed with areas of woodland; however much of the eastern section is adjacent to the settlement of Bishopton. The existing baseline noise environment in the more rural sections of the route is likely to be characterised by 'natural' sources such as wind and disturbed vegetation, with some contribution from anthropogenic sound such as distant road traffic and agricultural or forestry activity. Towards the eastern section, the baseline noise environment is likely to be further characterised by sound from anthropogenic sources- several sections of the EDM Project either pass over or alongside the A8 and M8 motorway, as well as crossing over a railway line.
- 2.38 In assessing the effects of noise associated with the construction and decommissioning of OHLs, it is accepted that the associated works, which are linear in the geographical extent, are of a short duration at any one location. The noise generated by construction of the New 132kV OHL and decommissioning activities associated with the Existing 132kV OHL will quickly diminish as the construction progresses, moving the activity away from each noise-sensitive location as construction and decommissioning continues.
- **2.39** Due to the short term and localised nature of the construction and decommissioning processes, any temporary noise created is likely to be minimal and concentrated in small areas at any one time as the contractors progress along the course of the route. It is therefore considered appropriate to scope out the assessment of noise resulting from the construction and decommissioning of the OHLs comprising the EDM Project.
- **2.40** In addition, and consistent with its Schedule 9 duties, SPEN is committed to implementing accepted good practice measures for controlling construction and decommissioning noise, which may include the following, as appropriate:
- restricted hours of construction/decommissioning works to avoid sensitive periods;
- the use of equipment with appropriate noise control measures (e.g. silencers, mufflers and acoustic hoods);
- the positioning of temporary site compounds as far as practicably possible from neighbouring residential properties; and
- additional good practice measures as set out in BS5228:2009.

Operation of the New 132kV OHL

2.41 Operating high voltage OHLs can generate audible noise, the level of which depends upon the operating voltage and the choice of conductor system. Noise from OHLs is produced by the phenomenon of 'corona discharge', this being a very limited breakdown of the air at points around the surface of the conductor. Conductor systems are designed and constructed to minimise corona discharge, but inevitable surface irregularities caused by surface damage or by deposition of surface contaminants such as insects, organic material such as seeds and dust, raindrops or pollution may locally enhance the electric field strength sufficiently for corona discharge to occur. The discharge can be audible in certain circumstances and would be heard as a crackling sound sometimes accompanied by a low frequency hum. Noise levels would increase during periods of rainfall. The OHL design for the New 132kV OHL is a 132kV Trident wood pole construction utilising Single Poplar conductors. With this type of construction and operating voltage, and during certain weather conditions as mentioned above, audible noise would only be perceptible to an observer standing directly beneath the

line. Noise levels a very short distance (50m) from the OHL would be imperceptible relative to the background. Therefore, there are no significant effects anticipated associated with operational noise.

2.42 On this basis, it is considered that there will be no significant noise effects during construction and operation of the New 132kV OHL of the EDM Project.

Air Quality (including Dust)

2.43 During construction and decommissioning, the operation of equipment, staff transport, construction vehicles and machinery will result in atmospheric emissions of waste exhaust gases containing NOx, NO and PM10 pollutants. The quantities emitted will depend on engine type, vehicle age, service history and fuel composition. Based on professional judgement it is considered that the number of vehicle movements anticipated to arise from construction and decommissioning of the EDM Project would not result in any exceedance of air quality standards either at the site or within the wider area. There are also no Air Quality Management Areas (AQMAs) in the surrounding area. Furthermore, dust emitting activities generally respond well to appropriate dust control measures such as those outlined in PAN 50: Controlling the Environmental Effects of Surface Mineral Workings^{xi}, and negative effects can greatly be reduced or eliminated. SPEN will commit to adopting measures for dust management during construction, focussing in particular on areas within 200m of residential properties, thereby controlling and reducing any potential effects on the potential receptors identified. These measures will be set out in the Construction Method Statements forming part of the Construction and Decommissioning Environmental Management Plan (CDEMP). On this basis, no significant effects are predicted and effects on air quality (including dust) are scoped out of the EIA.

Socio-Economics, Recreation and Tourism

- 2.44 Due to the short term and localised nature of the construction and decommissioning processes, any temporary disturbance created during construction and decommissioning is likely to be minimal and concentrated in small areas at any one time as the contractors progress along the course of the OHL routes. Once the New 132kV OHL is in place, there will be no further works required unless maintenance works are needed and use of the land can continue as normal, with the exception of the relatively small area of landtake along the route. Conversely the removal of the Existing 132kV OHL results in additional land being made available. As the construction and decommissioning processes require only a small labour force employed by SPEN, and is short in duration, this also means it is unlikely that the employment created will affect local employment levels or generate a significant source of income for the area.
- **2.45** In relation to tourism, no key tourist attractions are noted within 3km of the EDM Project, according to OS mapping, online searches and consultation. Where there is intervisibility with any key tourism features identified outwith, these have been identified and assessed as key viewpoints within the 3km landscape and visual assessment study area. Furthermore, it is recognised that there are already existing OHLs within the area which are not considered to have adversely affected tourism within the area. On this basis, potential effects on tourism are not considered likely to be significant.
- **2.46** In terms of recreation, the New 132kV OHL route crosses Inverclyde core paths 37B and 57D and Renfrewshire core paths LAN/13, LAN/14, LAN/6 north of High Hatton, LAN/15 south of High Hatton, BIS/15, Aspirational path BIS/20, BIS/2 at Greenock Road and Aspirational path BIS/17 around the Bishopton Tunnels. The route also crosses National Cycle Route 75 west of Auchenbothie Road, which connects Leith in east Edinburgh with Portavadie on the Cowall Peninsula in Argyll. In relation to the Existing 132kV OHL and its interaction with current recreational paths, the route crosses Inverclyde core paths 37B and 57D, LAN/13, LAN/16, LAN/11, BIS/14, Aspirational path BIS/20 and BIS/7 around Bishopton Tunnels. National Cycle Route 75 is also crossed by the Existing 132kV OHL west of Auchenbothie Road. Whilst temporary diversions may be required during construction and decommissioning, as noted previously, works at any one location will be short in duration therefore the impact of a diversion would be limited. All recreational paths would be open during operation of the New 132kV OHL.
- **2.47** Port Glasgow Golf Club is situated to the north of the New 132kV OHL route after it exits the Devol substation in the west, with Erskine Golf Club in proximity to the New 132kV OHL route in the east. As noted for tourism, it is considered that the existing OHLs in the area have not adversely affected recreation. Decommissioning of the Existing 132kV OHL will move the line away from Port Glasgow Golf Club.
- **2.48** Additionally, the replacement of the Existing 132kV OHL steel towers with smaller wood poles will result in reduced wider visibility, meaning that the New 132kV OHL is unlikely to affect baseline conditions in the case of both recreation and tourism.

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Climate Change

2.49 Schedule 4 Part 5(f) of the Regulations requires a consideration of the impact of the project on climate and the vulnerability of the project to climate change.

Relevant Climate Change Projections

- **2.50** In considering future climate change scenarios, IEMA guidance^{xii} recommends the use of the UK Climate Projections Website. 'Probabilistic' projections are provided for a range of variables including temperature, precipitation and sea level rise. The probabilistic projections can aid in the characterisation of future extreme weather events and emission scenario uncertainty. Wind speed and storm frequency/intensity are considered separately as global modelling information is currently more limited.
- **2.51** The UKCP18 projections^{xiii} for temperature and precipitation are presented for the UK as a whole and also on a regional basis. The UK projections consider three variables:
- Timeframe: the projections are presented for four overlapping time periods (2020s, 2040s, 2060s and 2080s);
- Probability: The projections are provided as probability distributions rather than single values, with figures provided for 5, 10, 50, 90 and 95% probability.
- Representative Concentration Pathways (RCP): Four pathways have been adopted; RCP2.6, RCP4.5, RCP6.0 and RCP8.5. These pathways describe different GHG and air pollutant emissions as well as their atmospheric concentrations and land use with each one resulting in a different range of global mean temperature increases over the 21st century. RCP2.6 represents a scenario which aims to keep global warming likely below 2°C compared to pre-industrial temperatures. RCP4.5 and RCP6.0 represent intermediate scenarios while RCP8.5 describes a very high GHG emission scenario. All scenarios are considered to be equally plausible.
- **2.52** The UKCP18 climate change projections anticipate the following climate changes in the Western Scotland region in the year 2060 (when the EDM Project nears the end of its operational life) based on pathway RCP6.0 and a 50% probability:
- temperatures are projected to increase by 1.9°C in summer and 1.6°C in winter;
- summer rainfall is projected to decrease by 11% and winter rainfall is anticipated to increase by 14%;
- there are no significant changes in projected wind speed; and,
- there is no evidence in the projections of an increase in the frequency or intensity of storms (albeit there are still large uncertainties in the future predictions of storms).

The Potential Impact of Climate Change on the EDM Project (Adaptation)

- **2.53** The construction phase of the New 132kV OHL is planned to be completed in 2023 and the climate is unlikely to change notably between the submission of the application and then. For this reason, climate change adaptation during the construction phase has been scoped out of the EIA.
- 2.54 The vulnerability of the project to climate change during operation will not be significant as a review of Scottish Environmental Protection Agency (SEPA) Flood Maps indicate that there are limited areas that are identified to be at risk of flooding in a 1/200-year event close to (and within) the route of the EDM Project. SEPA has also indicated at scoping that the EDM Project is considered to be 'essential infrastructure', which is suitable in areas of medium-high flood risk provided that appropriate design measures are implemented to ensure its safe operation in times of flooding. Avoidance of flood risk areas was a key consideration in the routeing process and crossing of floodplains has been minimised. Flood risk is identified in **Chapter 7** of this EIA Report. It is also unlikely that the EDM Project would have any adverse effect on the ability of receptors to adapt to climate change.
- **2.55** The materials and structures for the EDM Project, wood poles and conductors will be designed to withstand and operate within both the current and projected climate conditions.
- **2.56** Given the above, it is considered that no significant effects are likely to arise in relation to climate change adaptation during operation.

The Potential Impact on Greenhouse Gas Emissions During Operation

2.57 It is unlikely that the any significant effects will arise of the project's impact on climate during the operational phase as vehicle movements will be restricted for maintenance purposes only.

Land Use (Agriculture)

- **2.58** The Land Capability for Agriculture (LCA) classification^{xiv} is used to rank land on the basis of its potential productivity and cropping flexibility. This is determined by the extent to which the physical characteristics of the land (soil, climate and relief) impose long term restrictions on its use.
- **2.59** The LCA is a seven class system. Four of the classes are further subdivided into divisions. Class 1 represents land that has the highest potential flexibility of use whereas Class 7 land is of very limited agricultural value. Based on the classifications, the predominant land use capability classes through which the New 132kV OHL passes are:
- 3.2: land is capable of producing consistently high yields of a narrow range of crops and/or moderate yields of a wider range;
- 4.1: land is capable of producing a narrow range of crops; enterprises are based primarily on grassland with short arable breaks; and
- 5.2: land is capable of use as improved grassland and although the sward can be established, deterioration can be rapid and due to a range of factors.
- 2.60 The New 132kV OHL is not located within any areas of 'best and most versatile land' (classes 1, 2 and 3.1).
- 2.61 The predominant land use capability classes through which the Existing 132kV OHL passes are the same as the New 132kV OHL.
- 2.62 In relation to existing agricultural land use, effects will be limited to short term disturbance during construction and decommissioning, in the longer term, to the areas underneath the permanent development footprint, e.g. under wood poles and steel towers. As wood poles have a very small footprint, grazing can continue as per current activity. Furthermore, the New 132kV OHL is proposed on land not considered to be 'prime agricultural land', and used predominantly for grazing and commercial forestry, with little (or no) arable agricultural crop production taking place. Given that the Existing 132kV OHL will be removed, agricultural land previously lost will be reinstated/available for use. On the basis of the above, effects on agricultural activity, both as a result of construction of the New 132kV OHL and decommissioning of the existing 132kV, are not likely to be significant.
- **2.63** In relation to managing potential effects on land use (including agriculture), SPEN's 'Grantor's Charter'xv outlines its commitment to landowners which includes:
- how land will be accessed;
- how works will be undertaken on the land;
- how any resulting damage/compensation will be dealt with;
- how annual wayleave payments are derived; and,
- line of communication and contact information.

Aviation, Defence and Telecommunications

- 2.64 National Air Traffic Services (NATS), the Civil Aviation Authority (CAA), Glasgow Airport, Glasgow Prestwick Airport and the Defence Infrastructure Organisation (DIO) were consulted as part of the Scoping process. NATS and the DIO responded to confirm that there are no safeguarding issues identified with the proposed EDM Project. Glasgow Airport stated that full analysis would be provided once an application is submitted but that infringement of safeguarded areas is not considered likely. On the basis that the New 132kV OHL will comprise of wood poles that are smaller than the Existing 132kV OHL steel towers, which have not caused any aviation issues, it is not considered likely that there will be any aviation and defence issues caused by operation of the New 132kV OHL. This topic has been scoped out of the EIA.
- **2.65** BT was consulted as part of Scoping and confirmed that the EDM Project would not cause interference to the current or planned radio network in the area. Given that the Existing 132kV OHL does not cause any telecommunication interference which would necessitate further investigations for the New 132kV OHL, this topic has been scoped out of the EIA.

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Human Health

2.66 The EIA Regulations require that potential effects on human health are considered. However, it is not proposed to undertake a separate assessment of potential effects of the proposed EDM Project on human health on the basis that noise, air quality (including dust), traffic and transport and socio-economic impacts are being scoped out of the EIA. Furthermore, it is considered that air quality, noise and dust will be adequately mitigated through implementation of good practice construction methods.

2.67 An assessment of the effects of electromagnetic fields (EMFs) is presented in **Appendix 2.1: Electric and Magnetic Fields Report**. The assessment concludes that the New 132kV OHL would be fully compliant with Government policy. Specifically, all the EMFs produced would be significantly below the relevant exposure limits, and the proposed New 132kV OHL would comply with the policy on optimum phasing. Therefore, there would be no significant EMF effects resulting from the EDM Project and cumulatively with other developments. Therefore, no significant effects on human health associated with the EDM Project are likely.

Risk of Major Accidents and Disasters

2.68 The EDM Project is not located in an area with a history of natural disasters such as extreme weather events. Avoidance of flood risk areas was a key consideration in the routeing process, and crossing of floodplains has been minimised where possible. Whilst peat is present across the route of the New 132kV OHL, peat slide risk is not considered to be a significant issue and a detailed peat slide risk assessment has not been undertaken. As such, it is not considered that this represents a risk of major accident or disaster. Details of the peat survey and assessment work undertaken for the EDM Project are provided in Chapter 7: Geology, Hydrology, Hydrogeology, Water Resources and Peat. The construction, operation and decommissioning of the EDM Project would be managed within the requirements of a number of health and safety related Regulations, including the Construction (Design and Management) Regulations 2015 and the Health and Safety at Work etc. Act 1974.

Existing Utilities

2.69 The locations of existing gas, electricity and water services have been identified by SPEN through consultation with the relevant service providers. On the basis of this, SPEN advised that there will be no disruption to gas and water services during all phases of the EDM Project. It is unlikely there will be power outages during construction of the New 132kV OHL as the Existing 132kV OHL will remain in place until the New 132kV OHL is fully commissioned. However, if this was necessary, any outages would be planned well in advance and sufficient notice given to businesses and homeowners.

2.70 On this basis, significant effects on existing services are unlikely and not assessed further.

Consultation

2.71 Stakeholder engagement, including public involvement, is an important component of the Scottish planning and consenting system. While there are no formal pre-application requirements for consultation in respect of applications for section 37 consent/deemed planning permission, legislation and government guidance^{xvi} aim to ensure that the public, local communities, statutory and other consultees and interested parties have an opportunity to have their views considered throughout the planning process.

2.72 Striking the right balance can be challenging, and in seeking to achieve this, SPEN recognises the importance of consulting effectively on proposals and of being transparent about the decisions reached. SPEN has engaged with key stakeholders including local communities and others who have had an interest in the EDM Project, particularly during the routeing stage of the Project (during 2018 and 2019) and the feedback received has been considered during the detailed design of the final route alignment.

Routeing and Consultation

2.73 SPEN previously undertook a routeing exercise in 2006 to identify options for routeing a double circuit steel tower OHL to replace the Existing 132kV OHL between Erskine and Devol Moor substations. A preferred route for the steel tower OHL was identified and public consultation was undertaken in October 2007. Proposals were revised in 2010 based on consultation feedback and further technical appraisal work, and further consultation was undertaken between November and December 2010 to refine the (then) preferred route.

2.74 Since this initial routeing and consultation work, SPEN has further investigated the changing requirements in the transmission network. The conclusion has been that a new double circuit replacement on steel towers is no longer required, and that the Existing 132kV OHL can be replaced by a single circuit 132kV wood pole 'Trident' design. As a result, SPEN undertook a new routeing and consultation exercise in 2018**vii to identify options for a potential new 132kV wood pole OHL to replace the Existing 132kV OHL. The

objective was to identify a route for the OHL which meets the technical requirements of the electricity system, which is economically viable and causes, on balance, the least disturbance to the environment and the people who live, work and enjoy recreation within it. Following established best practice for routeing OHLs*viii, a number of route options were identified then appraised against technical, economic and environmental considerations before arriving at a 'preferred' route.

2.75 During the routeing stage, SPEN undertook consultation with stakeholders and the public to invite views on the preferred route for the New 132kV OHL, the removal of the Existing 132kV OHL and information of any other issues, suggestions or feedback, particularly views on the local area, for example areas used for recreation, local environmental features, and any plans to build along the route.

2.76 The consultation period ran for four weeks from 12th February 2018 to 16th March 2018 prior to which letters were sent to the following groups:

- statutory and non-statutory consultees including community councils;
- local residents, landowners and businesses along the route;
- known local interest and community groups operating in Renfrewshire and Inverceyde Council Areas;
- elected members of Inverclyde and Renfrewshire Council Areas, the Member of Parliament (MP) and Members of the Scottish Parliament (MSPs) whose constituencies are within in the Inverclyde and Renfrewshire Council areas; and
- respondents to the previous consultation undertaken in 2007 and 2010.
- **2.77** The letters were accompanied by a consultation leaflet providing details of the EDM Project, where and how the Routeing and Consultation Report could be viewed, and highlighting how representations could be made within the consultation window (either in person, via email or through the dedicated project website^{xix}).
- **2.78** SPEN also held two public consultation events to provide members of the public with access to more information on the project and the opportunity to speak with members of the project team. The exhibitions were held on 15th and 16th of February 2018 at the following locations:
- Thursday 15th February 2018 at the Cargill Centre, Lochwinnoch Road, Kilmacolm, Renfrewshire, PA13 4LE; and
- Friday 16th February 2018 at the Bishopton Scout Hall, Greenock Road, Bishopton, PA75NB
- **2.79** Venues were chosen to ensure that people near to the route were only a short distance from their nearest exhibition by car or public transport.
- **2.80** Newspaper adverts were placed in the Greenock Telegraph and The Gazette on 7th and 14th February advertising the commencement of the consultation period and the public exhibitions.
- **2.81** Following the feedback received during consultation, SPEN published a response^{xx} to the key issues raised by stakeholders on its consultation website. The document confirmed that feedback had been taken into consideration in identifying the 'proposed route' for progressing to EIA Scoping, and identified the next steps for the EDM Project.

Scoping Consultation

2.82 Consultation has formed an integral part of the EIA process and the EIA team and SPEN contacted a number of interested parties to determine their views on the proposed route of the EDM Project and to collect baseline information. Replies received from consultees in response to Scoping are detailed in **Table 2.1** and responses from other consultees who were contacted for further information to inform the EIA are detailed in the relevant topic chapters.

2.83 As shown in **Table 2.1** below, the scoping responses received indicated that, generally, the scope of the EIA had been defined appropriately. However, a number of consultees did highlight issues where further investigation or clarification was required. This has been highlighted and addressed where appropriate within the EIA Report.

Landowners

2.84 Before formal consultation commenced on the EDM Project in February 2018, and when the preferred route had been identified, SPEN identified all landowners who own land within the route. Owners were identified via a title deed search at the Land Registry.

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- **2.85** SPEN made contact with these landowners to make them aware of the proposal and of the potential for the proposal to directly affect land owned by them. SPEN encouraged individual landowners to attend one of the public exhibitions to discuss the proposal with SPEN staff and, in addition, offered individual face-to-face meetings with each landowner.
- **2.86** Following the consultation period and during the detailed design stage of the EDM Project, SPEN has continued to hold individual meetings with landowners and their representatives to gather feedback on the OHL design. For reasons of privacy and commercial confidentiality, the details of these meetings and discussions are not included in this EIA Report. However, SPEN has sought to address the concerns raised and suggestions received from landowners where reasonable and where other technical, environmental and economic considerations allow.

Baseline Conditions

- 2.87 The purpose of the EIA is to ensure that the likely significant effects of a development proposal (both positive and negative) are properly understood before any development consent is granted. This requires that work is carried out within the EDM Project area to determine and describe the environmental conditions against which future changes (including those which may take place independently of the development) can be measured or predicted and assessed. These conditions are referred to as the 'baseline' and are usually established through a combination of desk-based research, site survey, and empirical studies and projections. Together, these describe the current and future character of the EDM Project area and surroundings, and the value and vulnerability of key environmental resources and receptors.
- 2.88 Making predictions about how parameters such as land use, landscape, views and other environmental characteristics may change in the future relies on assumptions about future development and environmental trends. For this reason, where other development is not proposed in the vicinity of the EDM Project area, the baseline adopted for the EIA is normally taken as the current character and condition of the area and surrounds, and the likely significant environmental effects of the EDM Project are then assessed in the context of the current conditions alone. It is accepted that the baseline conditions will gradually alter through time as a result of climate change which has the potential to alter the landscape and species of flora and fauna which are currently located within the study area. However, as outlined earlier in this chapter, these climate change effects are unlikely to materially alter the findings of the EIA.
- **2.89** Baseline conditions for each topic have been given for both the Existing 132kV OHL and the New 132kV OHL comprising the EDM Project, and the means by which these have been established are set out in **Chapters 6-10** of this EIA Report.

Future Baseline in the Absence of the EDM Project

- **2.90** As natural processes and/or human activities can affect the baseline ('status quo'), it is important to establish future baseline scenario in the absence of the EDM Project, i.e. the likely environmental conditions that would exist in the absence of the particular development under construction. Establishing the future baseline scenario requires transparent decision making as to what natural process changes and/or changes as a result of human activity should be included or excluded from the future baseline scenario.
- **2.91** Consideration of the future baseline scenario which acknowledges the absence of the New 132kV OHL and retention of the Existing 132kV OHL, including projected climate change, is described in **Chapters 6-10** of this EIA Report.

Identification and Assessment of Effects

Approach to Assessment of Effects

2.92 As detailed in **Chapter 1: Introduction**, it has been necessary to consider not only the environmental effects associated with the construction and operation of the New 132kV OHL but also the decommissioning effects associated with the removal of the Existing 132kV OHL. Each topic assessment defines the scope of the construction and operational assessment for the New 132kV OHL and the decommissioning assessment for the Existing 132kV OHL.

Significant Effects

- **2.93** The identification of the significance of effects (whether positive or negative) arising from a development is a key stage in the EIA process. This judgement is vital in informing the decision-making process.
- **2.94** As the identification of significant effects will differ depending on the context and the receptors affected by the EDM Project, there is no general definition of what constitutes significance. In EIA, the term significance reflects both its literal meaning of

'importance' and its statistical meaning where there is an element of quantification. This combination of judgemental/subjective and quantifiable/objective tests has become the standard approach to understanding and applying the test of 'significance'.

- **2.95** Each topic area chapter contains a section that identifies the likely significant effects on the environment that may arise as a result of the construction and operation of the New 132kV OHL and decommissioning of the Existing 132kV OHL. The significance of environmental effects is typically assessed by considering both the character of the change (i.e. the magnitude and duration of the effect) and the value/sensitivity of the environmental resource that experiences this effect (i.e. the receptor).
- **2.96** Effects may be direct, indirect, secondary or cumulative. Within these categories, they may also be short, medium or long-term, permanent or temporary, beneficial or adverse. Direct (or primary) effects are changes to the baseline arising directly from activities that form part of the EDM Project, for example, effects associated with felling of the wayleave to accommodate the New 132kV OHL. Indirect (or secondary) effects are those that arise as a result of a direct effect, for example effects associated with areas of 'windthrow' following felling of the wayleave. These are explained further below.
- **2.97** Specific significance criteria have been defined for the majority of topic areas, and these are detailed in the topic chapters. As the specialists undertaking each element of the assessment have defined these criteria based on guidance/professional judgement, there is some variation. However, each of the sets of criteria is based on the following aspects:
- type of effect (adverse/beneficial);
- extent and magnitude of effect;
- the likelihood of the effect occurring, based on a scale of certain, likely or unlikely;
- nature of effect: reversible, irreversible, long term, short term;
- value and/or sensitivity of receptor based on a scale of high, medium and low and in some instances negligible;
- consideration of legal requirements, policies and standards; and
- consideration of relevant environmental thresholds.
- **2.98** Using the criteria in each chapter, the significance of the effects arising from the EDM Project has been categorised, where possible and unless otherwise stated within the chapter, as follows:
- major;
- moderate;
- minor; or
- none.
- **2.99** Unless stated otherwise in methodologies set out in the individual assessment chapters, effects of 'major' or 'moderate' significance are considered to be 'significant' in the context of the EIA Regulations.
- **2.100** Whilst each topic assessment has assessed the effects of the EDM Project, it has been necessary to also consider the way in which an Infrastructure Location Allowance (ILA) (or micrositing allowance) of 50m either side of each project component may change the significance of effects predicted, and this has been considered in the topic assessments within **Chapters 6-11**.
- **2.101** Each chapter concludes with a summary of the likely significant effects identified in the assessment. Where no significant effects are likely, a simple statement to this affect is given.

Direct and Indirect Effects

- **2.102** As outlined above, the EDM Project may result in both direct and indirect (or secondary) effects. These are primarily associated with the felling of the wayleave to accommodate the New 132kV OHL. A 'wayleave' or servitude right (35m either side of the wood pole OHL), is required within woodland to safely construct and maintain the New 132kV OHL. The application for section 37 consent submitted for the New 132kV OHL will request that consent is granted for a 70m wayleave including associated felling within this area, and therefore effects associated with the wayleave felling are considered 'direct' effects.
- **2.103** In some areas, the felling of forestry wayleave for the New 132kV OHL will expose previously sheltered trees to the wind. These trees have previously been part of a larger forest compartment where there was an element of mutual support being provided. By felling the wayleave this support will be removed and a 'brown forest edge' will be created, rendering any unstable forest edges

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facing the prevailing wind susceptible to 'windthrow effects', with these trees either falling or failing to reach their full crop potential. The area of proposed tree felling required to reduce the risk of windthrow has been identified, and this totals 0.3ha – further details are provided in **Chapter 4**.

2.104 The assessments within the topic chapters of this EIA Report make a distinction in the effects associated with felling *within* the wayleave corridor, and felling of windthrow areas *outside* of the wayleave, thereby ensuring that a realistic 'maximum-case scenario' has been assessed as part of a robust EIA. As the landowners in these areas are expected to be required to replant these areas, the assessments have been undertaken on the basis that there will be no net loss of forestry, and that these areas will be replanted on a 'like for like' basis. As such the effect of windthrow has been scoped out of detailed assessment. Where possible, SPEN will seek to liaise with these landowners to maximise environmental benefits associated with the replanting, by increasing species diversity for wider ecological benefit and environmental enhancement.

Interrelationships between Effects

2.105 Although the EIA Report is structured in standalone topic specific chapters, many of the considerations are interrelated, such as ecology and hydrology. As such, the interrelationship between potential effects between two topic areas is also considered in accordance with the EIA Regulations and addressed in **Chapters 6-10.**

Assessing Cumulative Effects

- **2.106** Schedule 4 of the EIA Regulations state that types of effect identified "should cover direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects."
- **2.107** Both 'inter-project' and 'intra-project' cumulative effects have been considered, as described in PAN 1/2013: "Cumulative effects arising from different elements of a project on environmental receptors (intra-project effects) and from projects combined with other activities (inter-project) impacts are commonly identified."
- **2.108** Likely 'inter' cumulative effects have been defined as the effects that the EDM Project may have in combination with other developments which are at application stage, consented, under construction or operational (i.e. the incremental effects resulting from the addition of EDM Project if all other developments are assumed to be in the baseline). Given that no decommissioning works associated with the Existing 132kV OHL will be undertaken concurrently with the construction of the EDM Project, there will be no combined effects between the existing and new OHLs anticipated.
- **2.109** Likely 'intra-project' cumulative effects have been defined as individual effects which may combine to have a total effect on an individual receptor. These effects have been considered under the 'interrelationship between effects' heading in each topic chapter.
- **2.110** The locations of the developments considered as part of the cumulative assessment for the EDM Project are shown on **Figure 6.1.6**. Details of the rationale for the cumulative developments are included in the assessments within each technical chapter.
- **2.111** The cut-off date for cumulative data collection as agreed in consultation with Renfrewshire Council, Inverclyde Council and SNH was September 2019. Changes to the cumulative baseline have not been included after this cut-off date to allow time for the assessment to be prepared.

Mitigation and Monitoring

- **2.112** The EIA Regulations state that an EIA Report should include "a description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis)". These measures have been termed 'mitigation' measures for the purposes of the EIA Report.
- 2.113 While mitigation has been embedded through the design process for a range of assessment topics, specific additional mitigation measures ('additional mitigation') are also proposed to prevent, reduce and offset likely adverse effects which could not be avoided through design. These additional mitigation measures have been identified through the EIA process. As an example, the monitoring of private water supplies (PWS) before and during construction, the confirmation of location of PWS pipework and the provision of alternative water supplies if required have been identified as forms of additional mitigation. Each assessment chapter recognises:
- Embedded mitigation items that are embedded through the design of the EDM Project are described in the topic chapters, and these will be delivered during the construction process (see **Appendix 4.1: Outline CDEMP**); and

- Additional mitigation items that are further required to mitigate the likely adverse effects of the EDM Project and which will be implemented to avoid, reduce or offset these effects identified in relation to particular topics.
- 2.114 The assessments presented in **Chapters 6** to 11 of the EIA Report have been undertaken on the basis that the embedded mitigation forms an integral part of the EDM Project. The best practice/industry standard measures which form the embedded mitigation to be implemented during the construction process across all topic areas are, by their nature, ones which are well understood, and for which there is a high degree of confidence as to their effectiveness. In other words, it is highly likely that these measures would be successful. The specialist topic chapters detail the additional mitigation identified during the assessment process to address localised site/issue specific likely adverse effects.
- **2.115** By making a distinction between embedded mitigation and additional mitigation, and with embedded mitigation forming an integral part of the EDM Project (i.e. being in place for assessment purposes), the EIA Report focuses on the likely significant effects of the EDM Project.
- **2.116** For reference, all embedded and additional mitigation measures are set out on a topic-by-topic basis in a Schedule of Mitigation included at **Appendix 2.2**.
- **2.117** Each assessment chapter also sets out details of any post-consent monitoring which is proposed for the EDM Project. These measures are also summarised in **Appendix 2.2**.

Data Gaps and Uncertainty in Assessment

- **2.118** Paragraph 6 of Schedule 4 of the Regulations requires that EIA Reports provide "details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved".
- **2.119** Whilst any assessment limitations are discussed in **Chapters 6-10**, it is considered that this EIA Report contains adequate information to enable the Scottish Ministers to form a reasoned conclusion on the significant effects of the EDM Project on the environment.

References

2.120 Part 10 of Schedule 4 of the Regulations requires that EIA Reports include "a reference list detailing the sources used for the descriptions and assessments included in the EIA Report". References to data sources, guidance and other information of relevance to the assessments are included as endnotes in **Chapters 6-10**.

Preparation of the EIA Report

- **2.121** Regulation 5(2) of the Regulations provides a list of the minimum information that must be contained in an EIA Report, including:
- "(a) a description of the development comprising information on the site, design, size and other relevant features of the development;
- (b) a description of the likely significant effects of the development on the environment;
- (c) a description of the features of the development and any measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- (d) a description of the reasonable alternatives studied by the developer, which are relevant to the development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment:
- (e) a non-technical summary of the information referred to in sub-paragraphs (a) to (d); and
- (f) any other information specified in schedule 4 relevant to the specific characteristics of the development and to the environmental features likely to be affected.
- **2.122** This EIA Report has been prepared in accordance with these requirements. Regulation 5(5) states that to ensure completeness and quality of the EIA Report:
 - "(a) the developer must ensure that the EIA report is prepared by competent experts; and

- (b) the EIA report must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts".
- 2.123 A statement of competency, setting out the qualifications and experience of chapter authors is provided at Appendix 1.1.
- **2.124** As shown in **Table 2.1** below, the scoping responses received indicated that, generally, the scope of the EIA had been defined appropriately. However, a number of consultees did highlight issues where further investigation or clarification was required. This has been highlighted and addressed where appropriate within the EIA Report.

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Table 2.1: Summary of EDM Project Scoping Responses

Consultee	Date of Response	Key Comments	Response
Scottish Government Energy Consents Unit (Scoping Opinion)	28/02/2019	Requested that Transport Scotland be consulted on the crossing of the M8.	Consultation with Transport Scotland will be undertaken by the appointed contractor prior to construction to agree the approach to crossing the M8 motorway. The approach agreed will be set out in the construction method statement within the CDEMP and the CTMP.
		Highlighted that Port Glasgow West Community Council has requested a meeting with SPEN to discuss their concerns, particularly regarding the routeing of the EDM Project within the Port Glasgow Golf Course.	SPEN discussed the concerns raised with the community council via email and advised that Port Glasgow Golf Course had been consulted separately by SPEN's wayleave team to inform the detailed design of the EDM Project.
			Effects on ecology and ornithology have been assessed in Chapter 8: Ecology and Ornithology of the EIA Report.
			The effects of the EDM Project on human health has not been considered in detail given that topic areas which would generally contribute to changes in the health status of individuals (including noise and traffic) have been scoped out of the assessment for reasons given above.
		The Applicant should investigate the presence of any private water supplies which may be impacted by the development.	Private water supply (PWS) data has been sourced from both Renfrewshire and Inverclyde Councils and supplemented by consultation with PWS owners and field visits, where possible. The design has sought to avoid PWS sources and catchments as far as practicable. A detailed assessment of the potential construction effects on PWS is included in Chapter 7: Geology, Hydrology, Hydrogeology and Peat.
		ECU expects all Landscape and Visual Impact Assessment (LVIA) viewpoints to be agreed with SNH, Inverclyde and Renfrewshire Councils.	SNH and Renfrewshire Council did not request any further viewpoints through the EIA Scoping process. Inverclyde Council requested one further viewpoint to represent views from Kilmacolm. This has been included in the LVIA as Viewpoint 11. A letter was issued to SNH, Renfrewshire Council and Inverclyde Council in September 2019 setting out the proposed viewpoints (including additional viewpoint) and approach to the Cumulative Landscape and Visual Impact Assessment (CLVIA). All consultees agreed with the proposed approach, with Inverclyde Council providing further recommendations of schemes to be included in the CLVIA.
		It is important to ensure any energy generation proposal on peat does not result in an unacceptable degradation of peat stability or increase peat landslide risk, and does not give rise to any pollution effect on nearby watercourses. Furthermore Ministers will require to understand the potential for risk to population, human health and public safety where paths, roadways or properties could be impacted by landslides. Advise that The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition) should be followed in the preparation of the EIA Report, which should contain such an assessment of peat stability and details of mitigation measures.	Given the nature of the EDM Project and limited presence of peat along the proposed route, it has not been considered necessary to undertake a peat slide risk assessment.
		Requested that a consolidated schedule of all mitigation measures is included in the EIA Report.	This chapter is supported by a Schedule of Mitigation which forms Appendix 2.2.
		All comments raised by consultees as part of scoping should be addressed in the EIA Report.	Noted.
		The requirements specified by Forestry Commission Scotland (FCS) should be followed to provide a full assessment of effects on woodland removal.	A detailed assessment of the potential effects on forestry is included in Chapter 10: Forestry.
Inverclyde Council	31/01/2019	Both the adopted and proposed Local Development Plan (LDP) should be covered within the EIA Report. Supplementary guidance on energy associated with the adopted plan should also be considered.	Chapter 5: Policy Context sets out the relevant national and local planning policies and material considerations to the EDM Project at the time of submission.
		Confirm the proposed 3km study area for the LVIA is acceptable. Direct discussion with the council should be carried out in regards to the list of proposed representative assessment viewpoints to inform the LVIA. There may a requirement for viewpoints out with the 3km study area unless it is demonstrated through wireframes that that there is no significant visual impact particularly near the western approaches to Kilmacolm.	Further consultation has been undertaken with SNH, Renfrewshire Council and Inverclyde Council during the EIA process to inform the final selection of assessment viewpoints, and this was done in the form of a letter issued in September 2019. An additional viewpoint from Kilmacolm has been included at Inverclyde Council's request. Further details are provided in Chapter 6: Landscape and Visual Amenity.
		Contact should be maintained with Inverclyde Council pre-submission to make sure information regarding nearby proposed developments are included.	Further consultation has been undertaken with SNH, Renfrewshire Council and Inverclyde Council during the EIA process to determine the relevant cumulative schemes (including other committed developments) for inclusion in the EIA. Further details are provided in

Consultee	Date of Response	Key Comments	Response
			Chapter 6: Landscape and Visual Amenity. A cumulative 'cut-off' date was set at 30 th September 2019.
		Inverclyde Council highlighted the impacts on forestry, particularly ancient and semi-natural woodland, as a result of the proposed EDM Project. Inverclyde Council note that SPEN are aware of the species and mix that should be introduced.	Effects on forestry has been assessed in Chapter 10 . Compensatory planting proposals have been agreed through consultation with Forestry and Land Scotland, Renfrewshire Council and Inverclyde Council.
Renfrewshire Council	23/01/2019	Renfrewshire Council confirmed that the Adopted Renfrewshire LDP 2014 should be the focus of the EIA Report as the emerging LDP is not considered to be a material consideration.	Chapter 5: Policy Context sets out the relevant national and local planning policies and material considerations to which regard is to be had in relation to the EDM Project at the time of submission.
		Confirmed that the effects to be scoped out of the EIA Report (as stated at paragraph 10.27 of the Scoping Report) were appropriate. These included: Traffic and transport; Construction and operational noise; Socio-economics, tourism and recreation; Air Quality; Climate change; Human health; and Major accidents and disasters.	Noted. Justification is provided above for why these topics have been scoped out.
		Confirmed that the landscape and visual effects proposed to be included within the EIA Report are appropriate.	Noted.
		Confirmed that the proposed methodology, study area, survey scope and list of effects are considered to be appropriate for the proposed ecology and ornithology assessments.	
		Confirmed the cultural heritage study areas are appropriate and that there are no other heritage assets which should be considered.	
SNH	30/01/2019	No issues were raised in relation to landscape and visual amenity. As such, it was highlighted that landscape and visual amenity effects could be scoped out of the EIA.	An LVIA has been prepared, particularly in light of Inverclyde Council's request for an additional viewpoint from Kilmacolm. See Chapter 6: Landscape and Visual Amenity.
		SNH request that survey information gathered in relation to whooper swan as the qualifying species for the Black Cart SPA, and used to inform the ornithology assessment, is presented within the EIA Report. This should include vantage point (VP) viewsheds and tabulated monthly or seasonal VP data as well as proposed mitigation measures.	The Black Cart SPA is approximately 3.7km south-east of the end of the EDM Project. As such, there is likely to be very little survey data gathered directly related to this Natura site, especially given the VP viewshed distance is 2km. However, any observations of whooper swans recorded during baseline surveys has been included in Chapter 8 and Appendix 8.3 .
		SNH state that Hen Harrier and Red Shank surveys and assessment are not required given the proposed development's lack of connectivity with the Renfrewshire Heights SPA and Inner Clyde SPA.	Noted.
		SNH advise that the retention of existing in situ concrete bases associated with the Existing 132kV OHL (located within the SSSI) would be the least damaging option for surface vegetation and underlying hydrology associated with Dargavel Burn SSSI.	Noted. Decommissioning details for the Existing 132kV OHL are provided in Chapter 4: Project Description .
		In relation to the removal of the existing pylon at the eastern end of the Dargavel Burn SSSI, the decommissioning method statement should include: - Information on the stability of the surface in this area.	SPEN will produce a CDEMP which will identify those responsible for overseeing the construction and decommissioning works and will outline a series of established good practice working methods
		- Detailed information on the proposed methods for the removal of the old infrastructure including what kind of machinery would be needed for their dismantling and removal from the site.	intended to minimise environmental disturbance. The CDEMP will represent a commitment to delivering the environmental
		- Information detailing the access route including measures to minimise damage such as:	recommendations, mitigation measures and consent conditions formulated during the design and EIA process. The adherence to a CDEMP is likely to form a condition to the deemed planning
		minimising the number of times the vehicles track over the agreed route;	permission. A template CDEMP is provided at Appendix 4.1 .
		 no deviation from the agreed route; and no storage of materials on the wetland vegetation. 	
		The western pylon is located close to the northern boundary of the site and an access route should be agreed that minimises tracking across the SSSI, with the agreed method statement including those measures that are listed above.	
		SNH advise that the siting of new wood poles on the slopes to the north of the Dargavel Burn SSSI should avoid springs and flushes which may supply water to it. The construction method statement should include:	The avoidance of Dargavel Burn SSSI and its potential GWDTE habitats has been a key design consideration during the detailed design of the proposed route (see Chapter 3).
		Detailed information on the proposed methods for the siting and installation of new infrastructure. Recommended avoiding placing new poles in any springs or flushes that may be supplying water to the SSSI.	Details of GWDTE habitats and potential effects on them are included in Chapter 7 and Chapter 8 .

Consultee	Date of Response	Key Comments	Response
		 Information detailing the access route including measures to minimise damage such as: avoiding tracking across spring and flushes; taping off springs and flushes to exclude them from the working corridor and minimize risk of damage; if planning an access track that crosses watercourses or GWDTEs you may need to consult SEPA; if installing a track refer to best practice guidelines to avoid any interruption of the hydrology of any springs and flushes supplying water to the SSSI. Details regarding storage of materials i.e. do not store any materials on springs and flushes. Details of measures to avoid an increase in the sediment load reaching the SSSI, either through the burns which enter the SSSI from the north or via seepages. 	The CDEMP will set out the relevant construction practices required to minimise effects on Dargavel Burn SSSI as well as good practice construction methods to be employed.
		The Existing 132kV OHL passes through the Formakin SSSI, within which one pylon is located. The decommissioning method statement should include: Detailed information on the proposed methods for the removal of the old pylon including what kind of machinery would be needed for its dismantling and removal from the site. Information detailing the access route including measures to minimise damage such as; minimising the number of times the vehicles track over the agreed route no deviation from the agreed route no storage of materials within the SSSI	These details will be provided in the CDEMP, a template of which is provided at Appendix 4.1 .
		Recommend seeking advice from the appropriate local authorities (Inverclyde Council and Renfrewshire Council) regarding potential impacts to locally designated sites such as Site of Importance for Nature Conservation (SINC). Advise that Renfrewshire Council is currently undertaking a review of their locally designated sites.	Consultation has been undertaken as necessary. Further details are provided in Chapter 8 .
		The results of field surveys for protected species should be used to inform design and layout as well as avoiding or minimising impacts. The results should be presented within the EIA Report and include a description of potential impacts and proposed mitigation.	An Extended Phase 1 habitat survey, National Vegetation Classification (NVC) survey and protected species surveys have informed the detailed design of the project, and full details can be found in Appendices 8.1 and 8.2 . Potential effects on habitats and species are assessed in Chapter 8 , and where necessary potential mitigation has been proposed.
		Where the impacts upon protected species are unavoidable, the EIA Report should be supported by full species protection plans.	No significant effects are predicted for protected species – see Chapter 8.
		The results from the extended Phase 1 Habitat surveys should be included within the EIA Report. Survey results should be used throughout the iterative design and layout process in order to avoid, where possible, fragile and priority habitats and other sensitive areas.	Results of the Extended Phase 1 and NVC surveys are provided in Appendix 8.1.
		SNH state that if tree felling is required, consultation with Forestry Commission Scotland is recommended.	Scottish Forestry (formerly Forestry Commission Scotland) has been consulted by the forestry specialists during the EIA to inform the forestry assessment and proposed compensatory planting plans – see Chapter 10 .
		The surveying approach for ornithology was agreed with SNH and includes breeding bird surveys and vantage point surveys. The results of all ornithology and ecology surveys should be fully detailed in the EIA Report.	Full details of ecology and ornithology survey efforts are included in Appendices 8.1-8.3 .
		Impacts upon access and recreational activities including impacts upon core paths should be considered. The EIA Report should include a map detailing access restrictions required during the operation of the site and highlight the rerouting of paths and core paths as well as alternative routes for consideration.	Due to the short term and localised nature of the construction and decommissioning process, any temporary disturbance to users of nearby routes created is likely to be minimal and concentrated in small areas at any one time as the contractors progress along the course of the existing and proposed routes. On the basis that these effects are not likely to be significant, the assessment on recreation resources has therefore been scoped out of the EIA.
		The LVIA should consider the potential effects of the approach to and on key views of or from the Formakin Garden and Designated Landscape (GDL) as well as on recreational receptors along the route.	SNH has raised concerns previously regarding the views on the approach to and from Formakin GDL. The GDL was given due consideration during the routeing stage and was avoided which has minimised effects on the asset and associated listed buildings. Detailed assessment has therefore not been undertaken in Chapter 6.
		The cumulative effects of the proposal with other existing or planned OHL infrastructure and wind farms should be fully considered.	Further consultation with SNH, Inverclyde Council and Renfrewshire Council has been undertaken to agree the list of cumulative schemes for inclusion in the assessment. See Chapter 6 .
SEPA	29/01/2019	It is advised that adequately scaled maps and an assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any flood risk assessment and details of any related Controlled Activities Regulations (CAR) applications are included in the EIA Report. The EIA Report should be accompanied by a Schedule of Mitigation (including pollution prevention measures).	Chapter 7 assesses the effects of the EDM Project on the water environment, and is accompanied by supporting figures. CAR licences

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			will be applied for by the appointed contractor during the construction process.
			A Schedule of Mitigation is included at Appendix 2.2 .
		Advised that the proposed route should be designed to avoid effects on the water environment. Where effects are unavoidable, justification for this should be provided. Where watercourse crossings are unavoidable, these should be numbered on a map and accompanied by a photograph and be designed to accommodate the 0.5% Annual Flood Exceedance Probability.	The routeing stage of the project sought to avoid or cross all flood zones at their narrowest point where avoidance was not possible. The detailed design stage has sought to avoid watercourse crossings by maintaining a 20m buffer around all ground infrastructure. Where this has not been possible due to other environmental constraints, details have been provided in Chapter 7 and Appendix 7.1.
			Further design details relating to the water environment are included in Chapter 3 .
		Request that the planning submission includes information on how the layout of the site has been designed to minimise peat disturbance as well as providing an outline of the preventative/mitigation measures which will be put in place to avoid significant drying or oxidation of peat.	Further design details relating to peat are included in Chapter 3 and Chapter 7 .
		A full Peat Management Plan (PMP) should be considered by the applicant dependent on the scale of the development and volume of peat likely to be encountered. The PMP should include a detailed map of peat depths and information regarding the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated and where it will be re-used should also be included.	As there is limited peat within the proposed construction area there will be minimal peat removal during construction. On this basis, PMP is not considered necessary for this proposed development.
		It is advised that the proposal should follow Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste as well as Developments on Peat and offsite uses of Waste Peat.	
		An assessment of GWDTEs should be carried out and a map provided showing that all potential GWDTEs are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of excavations deeper than 1m. A detailed site specific qualitative and/or quantitative risk assessment should be undertaken if these buffers cannot be accommodated.	Targeted NVC surveys have been undertaken across the route to inform an assessment of effects on GWDTEs in Chapter 7 , and findings are presented in Appendix 7.1 .
		watercourses located in close proximity to the proposed development.	Despite the EDM Project being considered as 'essential infrastructure', the routeing stage of the project sought to avoid or cross all flood zones at their narrowest point where avoidance was not possible. The detailed design stage sought to avoid watercourse crossings by maintaining a 20m buffer around all ground infrastructure. Where this has not been possible due to other environmental constraints, details have been provided in Chapter 7 and Appendix 7.1 .
		Information detailing forest removal is requested with SEPA requesting that key holing must be used where possible to avoid significant quantities of waste material.	Forestry details are provided in Chapters 4 and 10 .
		The EIA Report should assess the potential effects of forestry felling on water quality.	The effects of forestry felling on the water environment has been assessed in Chapter 7 .
		SEPA request that maps detailing the location, size, depths and dimensions of borrow pits as well as sections and plans setting out the restoration process should be included. Justification for each borrow pit location should also be included.	No borrow pits will be required during construction. Further details of the proposed construction process are provided in Chapter 4 .
	22/01/2019	HES note that they are content with the scope of the assessment and state that for the majority of assets identified, they consider it likely that effects will not be significant.	Noted.
(HES)		Note that only SM4326 (Bishopton aqueduct) and SM12807 (No.4 Ritchieston enclosure) will be closer to the new proposed line than they currently are to the Existing 132kV OHL and advise that degree of change to their setting will be relatively minor. Welcome the inclusion of their assessment and advise that for SM4326 a wireline will be sufficient for assessment purposes.	
		the application. Whilst, in principle, HES supports the removal of the line and poles from the monument, without further information on the methods to be employed HES	Details of the likely decommissioning process for the Existing 132kV OHL are provided in Chapter 4 . Chapter 9 provides an assessment of decommissioning effects on any known and unknown archaeology assets along the route and includes details of proposed mitigation. It is recognised that removal of existing infrastructure in the vicinity of SM165 would require Scheduled Monument Consent (SMC), so consultation will be undertaken with HES to establish procedures and a programme for obtaining SMC prior to construction.
Port Glasgow West Community Council	05/01/2019	The OHL infrastructure cross approximately 300 yards from the Port Glasgow Golf Course. This will result in significant effects with the proposed EDM Project having a major impact upon the course.	Further discussions were held between SPEN and Port Glasgow Golf Club to address these concerns.
		In terms of Port Glasgow, the Electricity tower and cable renewal would cover mostly moorland and farmland, of which we would be unlikely to object to. The damage done to this land will be short term, and will, with minimum ground repairs, return to its previous condition within a year.	
		Port Glasgow West Community Council requests a local site meeting with the, planners and SPEN to discuss their concerns.	1
	24/01/2019	FCS welcomes the routeing of the proposed line to avoid the majority of broadleaf woodland in the wider area.	

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Forestry Commission Scotland (FCS) (now Forestry Scotland)		The applicant is asked to demonstrate the risk of individual trees falling on the line and therefore the need for felling in regards to the 80m tree free corridor proposed along the length of the line. FCS advises that where additional wider forest management felling is proposed, this will require a separate Felling Licence. Drainage systems, biodiversity and forest landscape design should be taken into account and clearly set out the criteria for determining the acceptability of woodland removal and areas required to obtain Felling Licence.	Chapter 10 provides an assessment of effects of the EDM Project on forestry resources along the proposed route, including details of compensatory planting and future woodland management in accordance with the Policy on Control of Woodland Removal. Forestry proposals are shown in Figures 4.1a-h and Figures 10.1a-f.
		FCS requires that felling as the result of construction is mitigated by compensatory planting which should take place onsite (or on appropriate site types with at least the equivalent woodland-related net public benefit), and be fully assessed within the EIA Report.	
		The scope of the EIA Report should include a separate forestry chapter.	
		The applicant is advised to provide a felling and restocking plan as part of the EIA that conveys the long term restructuring of the forest should the development not go ahead. The baseline plan should be supported by maps and tables with felling and restocking figures. An additional 'forest plan with development' should also be produced to illustrate and quantify the same aspects if the development was to go ahead.	
		FCS advises that the Policy on Control of Woodland Removal along with FCS guidance (e.g. good forestry practice, sustainable forest management) should be taken into account when preparing the EIA.	
Scottish Water	10/01/2019	There are no Scottish Water drinking water catchments or water abstraction sources with the area affected by the proposed EDM Project.	Noted.
Marine Scotland	22/01/2019	Marine Scotland has advised that effects associated with the proposed development upon watercourses which support salmon and trout populations should be taken into consideration.	Fish surveys have not been undertaken as part of the EIA. Chapter 8 assumes that fish are present within suitable watercourses and mitigation is proposed as good practice.
		The developer is advised to consult Marine Scotland's generic scoping guidance for further information regarding fish populations and transmission line development and to contact The Clyde Foundation for further information on local fish stocks.	Noted. Marine Scotland's advice for fish populations has been followed.
		Marine Scotland advises that appropriate site specific mitigation measures are undertaken and presented within the EIA as a means of avoiding and/or minimising any effects on important fish stocks.	As above. Mitigation is proposed as good practice in Chapter 8 .
		The impacts associated with the susceptibility to flooding in the area and felling on the water quality and fish populations should also be addressed.	
		Felled material should be removed from within and adjacent to watercourses as set out in The Forests and Water UK Forestry Standard Guidelines.	All harvesting operations will be carried out in accordance with the Forestry Commission's UK Forestry Standard, and measures set out in the CDEMP.
Transport Scotland	23/01/2019	Transport Scotland advises that the M8 Trunk Road Area Manager will need to be consulted with regard to the methodology and preparation of the Transport Management Plan for the removal of existing OHL infrastructure above the trunk road and the installation of the new line.	Noted. Consultation will be undertaken by the appointed contractor as necessary when preparing the CTMP. The CTMP will be implemented as part of the CDEMP.
		Transport Scotland confirms it is acceptable for effects associated with construction traffic to be scoped out.	Noted.
		It is noted that construction and operational noise and air quality have been scoped out of the EIA. Transport Scotland is in agreement with this approach.	
Network Rail	23/01/2019	Details of proposed construction and engineering works within the vicinity of rail infrastructure should be included within the EIA Report.	Details of proposed construction and engineering works are provided in Chapter 4 .
		Network Rail advises that a traffic assessment should be prepared to assess the effects associated with construction traffic and any potential effects associated with Network Rail infrastructure and the suitability of any crossings.	Whilst a traffic assessment has been scoped out of the EIA in agreement with Transport Scotland, Renfrewshire Council and Inverclyde Council, a CTMP will be prepared for implementation during the construction phase. The CTMP will be agreed with Transport Scotland, Network Rail, Renfrewshire Council and Inverclyde Council, and will include a detailed methodology concerning the crossing of the M8 and railway line and will include details of any temporary traffic management measures.
VisitScotland	15/01/2019	VisitScotland advises that full consideration should be given to the effect the proposed development may have on tourism through the preparation of a tourism impact assessment. This assessment should be geographically sensitive and should consider the potential effect on any tourism offerings in the vicinity.	Effects on tourism have not been assessed in the EIA Report. There are no key tourist attractions within 2km of the New 132kV OHL as noted in the Scoping Report. It is also noted that the Existing 132kV OHL supported on steel towers is currently located within the area which is being replaced with smaller infrastructure as part of the EDM Project, therefore no significant adverse effects on tourism are predicted. On this basis, potential effects on tourism have been scoped out.
British Horse Society (BHS)	21/01/2019	BHS advise that any off-road tracks or non-motorised user's tracks or paths are multi-use and cater for all including horse riders and carriage drivers.	

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		BHS advise that consideration should be given to equestrians when installing infrastructure like gates, bridges, cattle grids and slippery surfaces. Access control must always be the least restrictive option.	All new access track formations will be temporary and for facilitating construction of the New 132kV OHL only -see Chapter 4 . Whilst temporary diversions of recreational routes may be required during construction, works at any one location will be short in duration therefore the effect of a diversion would be limited. All existing recreational paths will remain open during operation of the EDM Project.
The Coal Authority	07/01/2019	The Coal Authority confirms that the proposed development is located outside of the defined coalfield. Therefore, the Coal Authority has no comments or observations on the proposal.	Noted.
BT (British Telecom)	21/12/2018	BT concludes that the proposed development should not cause interference to the current and presently planned radio network.	
The Crown Estate	29/01/2019	The assets of Crown Estate Scotland are not affected by the proposed EDM Project.	1
NATS Safeguarding	14/01/2019	NATS anticipates no effects from the proposed development and has no safeguarding objections.	1
Defence Infrastructure Organisation (MoD)	03/01/2019	The Ministry of Defence has raised no safeguarding objections on the basis that the proposed EDM Project is outside of the MoD safeguarding areas.	
Glasgow Airport	15/01/19	Glasgow Airport has stated that their position on the proposal can only be confirmed once details are finalised and consultation on a full planning application has been sought.	Noted. Effects not considered likely due to nature of project being smaller than the Existing 132kV OHL and do not exceed 155.5AOD.
		Glasgow Airport noted that the proposed development is located within the safeguarding area beneath a protected conical surface and outer horizontal surface. It is noted that while infringement of the conical surface is unlikely given ground height, any structures exceeding 155.5 AOD may penetrate the outer horizontal surface.	

Approach to the EIA

- ix The Erskine to Devol Moor 132kV Replacement Project EIA Scoping Report (December 2018)
- ^x Accessible at: http://www.energyconsents.scot/ApplicationSearch.aspx using case reference: ECU00000739
- xi Design Manual for Roads and Bridges (DMRB), Volume 11 Environmental Assessment Techniques, Part 1, HA207/07 Air Quality
- Xii IEMA (2015) IEMA Environmental Impact Assessment Guide to Climate Change Resilience and Adaption. Available [online] at: https://www.iema.net/assets/templates/documents/iema_guidance_documents_eia_climate_change_resilience_and_adaptation%20(1).pdf, Last accessed on: 16/04/2019.
- xiii Met Office (2018) UK Climate Change Projections
- xiv The James Hutton Institute (2010), 'Land Capability for Agriculture in Scotland', Available [online] at:
- https://www.hutton.ac.uk/learning/exploringscotland/land-capability-agriculture-scotland, Last accessed on: 17/04/2019.
- XV SPEN (no date), 'Grantor's Charter', Available [online] at: https://www.spenergynetworks.co.uk/userfiles/file/1_Grantors_Charter_20140729.pdf, Last accessed on: 17/04/2019.
- xvi PAN 3/2010: Community Engagement
- xvii The findings of the routeing process for the EDM Project are presented in The Erskine to Devol Moor 132kV Replacement Project: Routeing and Consultation Report (February 2018). https://www.spenergynetworks.co.uk/pages/erskine_devol_moor.aspx
- xviii Major Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment, SPEN 2015
- xix https://www.spenergynetworks.co.uk/pages/erskine_devol_moor.aspx
- xx Erskine to Devol Moor 132kV Overhead Line Replacement: Feedback on Consultation (January 2019)

i Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment, as amended by Directive 2014/52/EU.

ii Guidance on The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000.

iii Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, Available [online] at: http://www.legislation.gov.uk/ssi/2017/101/contents/made, Last accessed on 16/04/2019.

iv The Scottish Government, (2017), 'Planning Advice Note (PAN) 1/2013 Environmental Impact Assessment (Revision 1)', Available [online] at: https://www.gov.scot/publications/planning-advice-note-1-2013-environmental-impact-assessment, Last accessed on: 16/04/2019.

V The Scottish Government, (2017), 'Planning Circular 1/2017: The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017. Available [online] at: https://www.gov.scot/publications/planning-circular-1-2017-environmental-impact-assessment-regulations-2017/. Last accessed on: 01/08/2019.

Vi Institute of Environmental Management and Assessment (IEMA), (2017), 'Delivering Proportionate EIA: A Collaborative Strategy for Enhancing UK Practice' Available [online] at: https://www.iema.net/policy/ia/proportionate-eia-guidance-2017.pdf, Last accessed on: 16/04/2019.

Vii Institute of Environmental Management and Assessment (IEMA), (2016), 'Delivering Quality Development', Available [online] at: https://www.iema.net/assets/newbuild/documents/Delivering%20Quality%20Development.pdf, Last accessed on: 16/04/2019.

viii SNH, (2018), 'A Handbook on Environmental Impact Assessment: Guidance for Competent Authorities, Consultation Bodies and others involved in the Environmental Impact Assessment Process in Scotland (Version 3)', Available [online] at:

https://www.nature.scot/handbook-environmental-impact-assessment-guidance-competent-authorities-consultees-and-others, Last accessed on: 16/04/2019.