

1. INTRODUCTION

1.1 Overview of the Proposed Development

- 1.1.1 This Environmental Impact Assessment Report (EIAR) has been prepared by Ramboll UK Limited (Ramboll) on behalf of Scottish Hydro Electric Transmission plc (the Applicant) who, operating and known as Scottish and Southern Electricity Networks Transmission (SENET Transmission), own, operate and develop the high voltage electricity transmission system in the north of Scotland and remote islands. This EIAR accompanies the Applicant's application for consent under section 37 of the Electricity Act 1989, as amended.
- 1.1.2 The Applicant is proposing to construct and operate a 13.3 kilometre (km)¹ double circuit 275 kV overhead line (OHL), supported by lattice steel towers between a proposed new substation at Creag Dhubh and to the existing Scottish Power Energy Networks (SPEN) 275 kV OHL that runs from Dalmally to Inverarnan, near Succoth Glen, via a Tie-In connection (the 'Proposed Development'). The location of the Proposed Development and Limit of Deviation (LOD) (known as 'the Site') is shown in **Plate 1.2** below, with the full **Figure 1.1** located in **Volume 3a** of the EIAR.
- 1.1.3 The scope of this application is limited to the construction and operation of the OHL, ancillary works and access tracks. The Proposed Development would not have a fixed operational life. It is assumed that the Proposed Development will be operational for 50 years or more. The effects associated with the construction phase can be considered to be representative of worst-case decommissioning effects, and therefore no separate decommissioning assessment is proposed as part of the EIA Report.
- 1.1.4 The proposed Creag Dhubh substation would connect the existing 132 kV OHL network between Taynuilt and Inveraray to the Proposed Development, which would in turn connect to the existing SPEN 275 kV OHL between Dalmally and Inverarnan to allow connection for renewable generation in the area to the wider electricity network. A separate site selection process has been undertaken for the proposed Creag Dhubh Substation, which will be the subject of a separate application for consent (under the Town and Country Planning (Scotland) Act 1997).
- 1.1.5 The connection of the existing 132 kV OHL network between Taynuilt to Inveraray to Creag Dhubh Substation (referred to as the ITE/ITW² Tie-In) would also form a separate application for consent under section 37 of the Electricity Act 1989, as amended.

SPEN Tie-In Application for Consent

- 1.1.6 Separately, the infrastructure to connect the Proposed Development to the existing SPEN 275 kV OHL between Dalmally and Inveraray (known as "the YW route"), has been assessed as part of this EIA.
- 1.1.7 The construction of the temporary diversion shall comprise two temporary masts for the by-pass of tower YW18 and the construction of new terminal tower YW17R (referred to as T48 throughout the EIAR) to be undertaken by SPEN as these works directly affect their YW route. The legislative framework does not allow the transfer of a section 37 consent to another electricity operator. As such, whilst the Applicant has assessed the Tie-In infrastructure, SPEN will submit a separate application for consent under section 37 of the Electricity Act 1989, as amended for a new terminal tower (T48) between existing SPEN Towers YW17 and YW18 and a temporary diversion to facilitate the Tie-In, whilst maintaining a supply of electricity to the wider network. SPEN will utilise this EIA for their s37 application and will submit their application at the same time as the Applicant.

¹ It is noted that this has been reduced from the 13.8 km stated within the Scoping Report.

² Inveraray to Taynuilt East and Inveraray to Taynuilt West.

Project Need

- 1.1.8 The original transmission network in Argyll and Bute was constructed over 60 years ago and designed to transmit electricity to consumers in rural areas of low-density population. As the UK strives for Net Zero (achieving a balance between the greenhouse gases emitted into the atmosphere and those taken out), the Applicant has seen a significant increase in generator connection applications in Argyll and Kintyre in the last 18 months, predominantly in renewable generation. In terms of this renewable generation (i.e. windfarms), there are infrastructure requirements needed to connect generators to the Applicants Transmission network.
- 1.1.9 There is therefore a requirement³ for the Applicant to increase its network capability in Argyll and Kintyre, beyond that already under current construction and public development, to enable the connection of further renewable generation and to export to the wider GB network. This group of works designed to deliver the required increase in network capacity has been named the 'Argyll and Kintyre 275 kV Strategy'⁴ (**Plate 1.1**).
- 1.1.10 The Proposed Development forms part of this strategy and aims to reinforce the existing transmission network connections in the Argyll region, to enable renewable energy projects to connect to the GB transmission network and to ensure security of supply. Infrastructure for the transportation of low carbon electricity is essential to delivering the Scottish Government target for the equivalent of 50% of Scotland's heat, transport, and electricity consumption to be supplied from renewable sources. This is why enabling the transition to a low carbon economy remains the Applicants main strategic purpose. Further details on the Applicants Sustainability Strategy are provided in Section 1.4.

³ Section 9 of the Electricity Act 1989.

⁴ <https://www.ssen-transmission.co.uk/projects/argyll-and-kintyre-275kv-strategy/>.

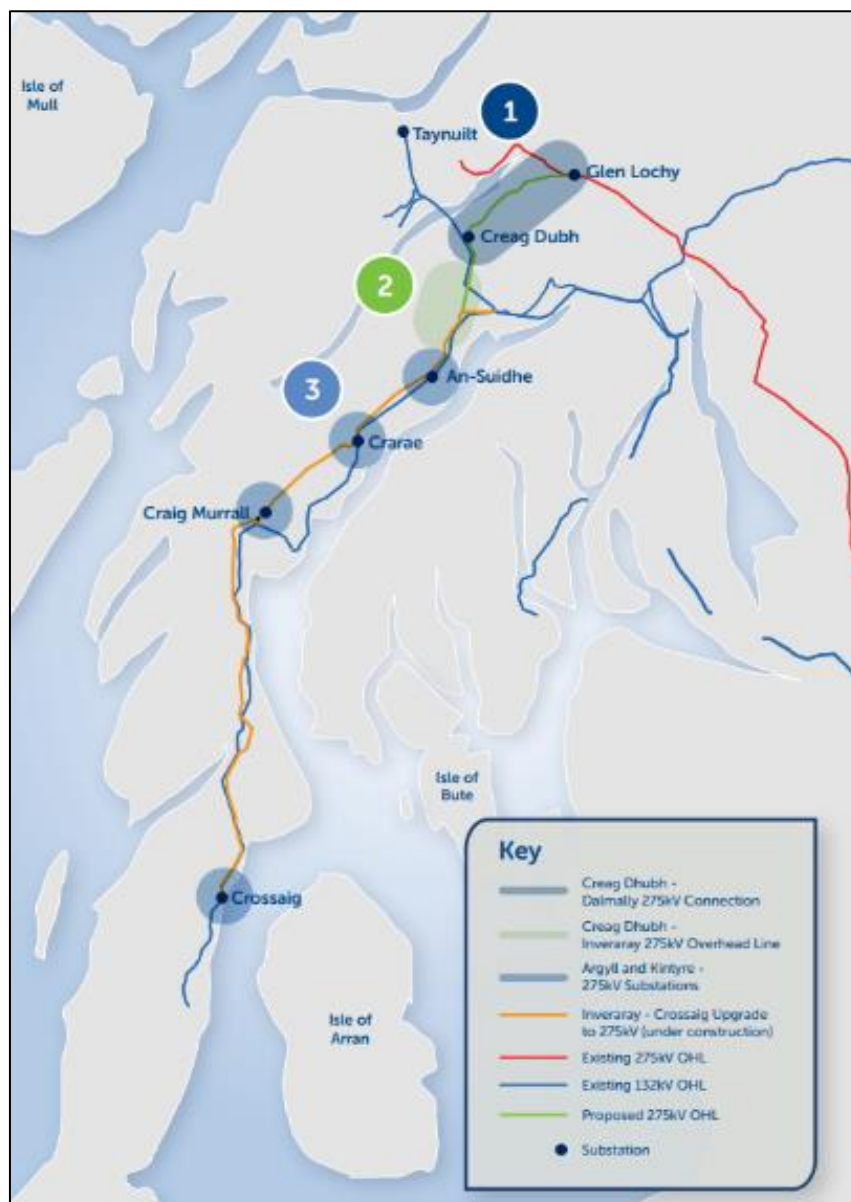


Plate 1.1: Argyll and Kintyre 275 kV Strategy

1.2 Background to the Proposed Development

1.2.1 A combined corridor and route selection exercise (Stage 1 and 2) was completed identifying a Preferred Route between the proposed Creag Dhubh substation and the existing Dalmally substation, with public consultation initiated in October 2016. Details of all consultation documents can be found on the Applicant's project website: <https://www.ssen-transmission.co.uk/projects/creag-dhubh-dalmally-275kv-connection/>. Public consultation on the Preferred Alignment (Stage 3) was initially undertaken in March 2018. Following the receipt of consultation feedback, the Applicant reviewed potential connection options and identified the possibility of connecting the Proposed OHL into a new switching station in Glen Lochy on the existing SPEN 275 kV OHL which passes through Dalmally, and then heads north east of Stronmilchan, connecting to the Dalmally Substation.

- 1.2.2 Consequently, an additional Stage 1 Route Selection exercise was undertaken⁵ and a Preferred Route Option (Route Option B1) was selected following survey, assessment, and virtual consultation in September 2020⁶. An alignment selection exercise (Stage 3) was completed in April 2021 identifying a Preferred Alignment (Baseline plus alignment deviation option GL5) between Tower T28 and Glen Lochy switching station. A virtual consultation was then undertaken in July and August 2021, seeking views on the Preferred Alignment and the Creag Dhubh substation Proposal of Application Notice (PAN), as well as providing updates on Creag Dhubh substation and Glen Lochy Switching station. Further details are provided in the Report on Consultation (ROC), October 2021⁷.
- 1.2.3 During the consultation period in July and August 2021, SPEN and the Applicant conducted more detailed discussions regarding the SPEN Tie-In of the existing SPEN OHL to the Glen Lochy (Succoth Glen) Switching Station. The SPEN Tie-In to the Switching Station is designed to allow electricity on the Applicant's Proposed Development to connect onto the existing SPEN OHL and subsequently be distributed to the wider electricity network. The SPEN Tie-In connection removes the need for the Glen Lochy (Succoth Glen) Switching Station; instead towers and wires are used to configure the connection between the Proposed Development and the existing SPEN OHL. Therefore, the Glen Lochy (Succoth Glen) Switching Station will not be built at this time.
- 1.2.4 Therefore, three locations for the SPEN Tie-In were identified between T41 and T47 of the Preferred Alignment, and a further comparative appraisal of the environmental, engineering, costs and risks was undertaken for each Tie-In Connection (between T41 and T47 of the Preferred Alignment). This identified Tie-In Connection 1 as the preferred Tie-In Connection (**Figure 3.3, EIAR Volume 3a**). Further details on the routing and alignment process can be found within **Chapter 3: Consideration of Alternatives (EIAR Volume 2)**.
- 1.2.5 The Proposed Indicative Alignment (**Plate 1.2**) is now being taken forward to the consenting process (Stage 4) and forms the Proposed Development for which consent is being sought. The full **Figure 1.1** is located in **EIAR Volume 3a**.
- 1.2.6 Further details of the Proposed Development are provided in **Chapter 2: Description of the Proposed Development (EIAR Volume 2)**, with a more detailed view of the Proposed Indicative Alignment (including proposed access tracks) shown in **Figures 2.1a to 2.1b (EIAR Volume 3a)**.

5 SSEN Transmission 2020. North Argyll 275 kV Overhead Line Reinforcement (LT29) - Environmental Routing Study.

6 SSEN Transmission 2020. Report on Consultation Craig Dhubh to Dalmally 275kV Connection. November 2020. Available at: <https://www.ssen-transmission.co.uk/projects/creag-dhubh-dalmally-275kv-connection/> [Accessed 7th April 2021].

7 SSEN Transmission 2021. Report on Consultation Craig Dhubh to Dalmally 275kV Connection. October 2021. Available at: <https://www.ssen-transmission.co.uk/projects/creag-dhubh-dalmally-275kv-connection/>.

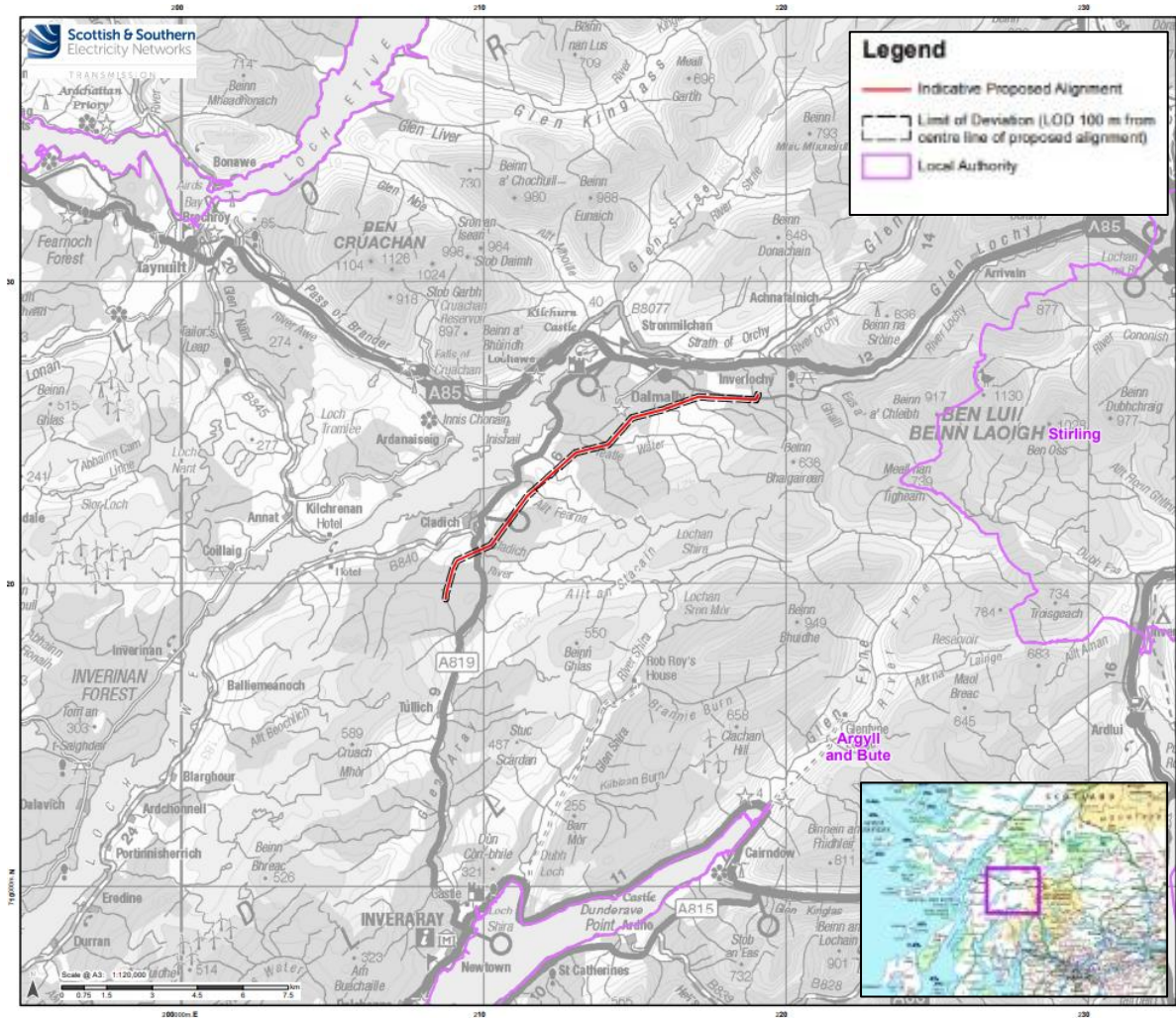


Plate 1.2: Proposed Development Location

1.3 Legislative Requirements

- 1.3.1 An application for consent for the Proposed Development will be made to the Scottish Ministers under section 37 of the Electricity Act 1989, along with a request for a direction that planning permission be deemed to be granted under section 57 (2) of the Town and Country Planning (Scotland) Act 1997. As the Proposed Development involves the construction of an OHL with a voltage of more than 132 kV it is categorised as ‘Schedule 2’ development under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (the ‘EIA Regulations’). An official request for a Screening Opinion was not made to the Scottish Ministers. However, considering the potential for likely significant effects on the environment by virtue of factors such as its nature, size, or location, a voluntary Environmental Impact Assessment Report (EIA Report) has been prepared in support of the s37 application.
- 1.3.2 Certain sections of the Proposed Development are adjacent to a site of European nature conservation importance (Glen Etive and Glen Fyne Special Protection Area (SPA)), as defined by European Council Directives of 2 April 1979 on the Conservation of Wild Birds (79/409/EEC) and of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC). The Directives have been implemented in the UK by the Conservation (Natural Habitats &c) Regulations 1994. Where a plan or project is likely to have a significant effect on a European site, and that plan or project is not directly connected with or necessary to the management of the site, such sites are protected by the duties placed on competent authorities to make an appropriate assessment of the implications for the site in view of the site’s conservation objectives and, in general terms, to agree to the plan or

project only after having ascertained that it will not affect the integrity⁸ of the site. Information is provided in this EIAR to assist in the appropriate assessment of the likely effects of the development on the European sites (**Technical Appendix (TA) 7.3: HRA, EIAR Volume 4**).

- 1.3.3 A request for a Scoping Opinion was made to the Scottish Ministers under Regulation 12 of the EIA Regulations in December 2020. A Scoping Report (**TA 4.1, EIAR Volume 4**) was submitted to support the request, which sought input from the Energy Consents Unit (ECU), and statutory and non-statutory consultees regarding the information to be provided within this EIA Report. The Scoping Opinion (**TA 4.2, EIAR Volume 4**) of the Scottish Ministers was issued in March 2022 confirming the scope of the EIA Report. Further details are contained in **Chapter 4: EIA Consultation and Scope** and accompanying appendices.

1.4 Sustainability Strategy

- 1.4.1 A key part of the Applicants Sustainability Strategy⁹ is to achieve Biodiversity Net Gain (BNG) in future projects. As such, the ambition is to ensure that activities not only maintain the existing balance but enhance the biodiversity in our Proposed Development area.

- 1.4.2 The Proposed Development has been designed to:

- Ensure natural environment considerations have been included in decision making at each stage of the project's development;
- Utilise the mitigation hierarchy to avoid impacts by consideration of biodiversity in project design;
- Positively contribute to the United Nations (UN) and Scottish Government Biodiversity strategies by achieving an overall 'No Net Loss' on new infrastructure projects gaining consent in 2020 onwards and achieving Net Gain on projects gaining consent in 2025 onwards; and
- Work with our supply chain to gain the maximum benefit during asset replacement and upgrades.

1.5 Biodiversity Net Gain

- 1.5.1 BNG is a process which leaves nature in a better state than it started. Although it is an internationally recognised process and tool within the development industry, it is not a term that is widely used or implemented in Scotland. A small handful of businesses are making voluntary commitments to incorporating BNG into their projects, including the Applicant.
- 1.5.2 The Applicant has developed a BNG toolkit based upon the Natural England metric, which aims to quantify biodiversity based upon the value of habitats for nature. It is an efficient and effective method for demonstrating whether development projects have been able to maintain or increase the biodiversity value of a development site after construction works.
- 1.5.3 For BNG to be used appropriately and to generate long-term gains for nature, the good practice principles established by the Business and Biodiversity Offset Programme (BBOP) should be followed. These principles have been established in the context of UK development by the Construction Industry Research and Information Association (CIRIA), the Chartered Institute for Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA)¹⁰. BNG does not apply to Statutory designated


⁸ The integrity of a site can be defined as the coherence of all its ecological structure and function, across its whole area, which enables it to sustain the habitat, complex of habitats and/or the levels of populations for which it was classified.

⁹ <https://www.ssen-transmission.co.uk/media/2701/sustainability-strategy.pdf>.

¹⁰ CIRIA, CIEEM and IEMA, 2016. Biodiversity Net Gain: Good Practice Principles for Development. Available at: <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf> [Accessed 7th April 2021].

sites or irreplaceable habitats (e.g. Ancient Woodland, blanket bog)¹¹. In line with the Applicant's Sustainability Strategy, a BNG assessment will be completed following submission¹² of the s37 Application.

Environmental Enhancement- *Wildflower Corridors*



As well as mitigation through design, the Applicant has also considered potential enhancement opportunities.

The creation of wildflower rich habitats within the operational corridor (OC) of the Proposed Development would be a great way to connect existing habitats as well as supporting insect pollinators and other wildlife. In addition, this would increase the biodiversity value of the habitat (within the OC) and contribute positively to BNG, as well as meeting the aims of the Scottish Government's National Pollinator Strategy¹³.

1.5.4 Further details on habitat enhancement and management opportunities are provided in **Technical Appendix 6.3: Outline Habitat Management Plan (EIAR Volume 4)**.

1.6 Purpose of the EIAR

1.6.1 This EIAR presents information on the identification and assessment of the likely significant positive and negative environmental effects of the Proposed Development. The EIAR has been prepared to meet the requirements of Schedule 4 (Information for Inclusion in EIARs)¹⁴ of both the Electricity Works and Town and Country Planning EIA Regulations, and the Institute of Environmental Management and Assessment (IEMA) Quality Mark Criteria. The EIAR also takes into account relevant guidance set out in the Scottish Government Planning Advice Note (PAN)¹⁵, which emphasises the importance of achieving a proportionate EIA scope, focussed on the likely significant effects.

1.6.2 Further details of the statutory requirements for EIA are set out in **Chapter 5: Methodology**.

¹¹ Any irreplaceable habitats identified, including ancient woodland and good/moderate condition blanket bog, are entered into the assessment toolkit. This is a requirement of the BNG process as it is not possible to compensate for losses to irreplaceable habitat and they are therefore not quantified. This follows UK best practice and the SHE Transmission BNG guidance.

¹² As a BNG assessment is not a planning requirement, it will be submitted post application. As BNG is based on definitive numbers, this allows the BNG assessment to be undertaken based on final designs, resulting in a more accurate output.

¹³ Pollinator Strategy for Scotland 2017 – 2027. Available at: <https://www.nature.scot/doc/pollinator-strategy-scotland-2017-2027>.

¹⁴ Schedule 4 of the EIA regulations determine what information is required to be included in the Environmental Impact Assessment Report. Schedule 4 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 available at: <https://www.legislation.gov.uk/ssi/2017/101/schedule/4/made>.

¹⁵ Scottish Government, (2013). Planning Advice Note 1/2013: Environmental Impact Assessment. Available at: <https://www.gov.scot/publications/planning-advice-note-1-2013-environmental-impact-assessment/> [Last accessed 10/06/2021].

1.7 EIAR Structure

The EIAR comprises four volumes:

- Volume 1: Non-Technical Summary (NTS);
- Volume 2: Main Report;
- Volume 3a: Figures;
- Volume 3b: Visual Representations; and
- Volume 4: Technical Appendices.

Additional documentation that will be submitted with this application includes:

- Section 37 application (the content of the application is set out in **Chapter 2: Description of the Proposed Development, EIAR Volume 2**);
- Cover Letter;
- Planning Statement;
- Public Road Access Drawings; and
- Pre-Application Consultation Report: Creag Dhubh to Dalmally 275kv Report on Consultation 2021.

1.8 Notifications

1.8.1 Notice will be served to the relevant planning authorities, in this case Argyll and Bute Council (ABC) of the application to the Scottish Ministers for consent under s37 of the Electricity Act.

1.8.2 In accordance with the Electricity (Applications for Consent) Regulations 1990, and Regulation 14 of the EIA Regulations, the application and this EIA Report will be advertised in the following newspapers:

- Edinburgh Gazette;
- Glasgow Herald;
- Oban Times; and
- Argyll Advertiser.

1.8.3 There is a temporary relaxation of the requirement for displaying paper copies of the EIA Report at a named public place under the temporary coronavirus modifications to the electricity works regulations¹⁶. In accordance with the temporary modifications, electronic versions of the application including this EIA Report and its supporting volumes are available to download from the Applicants website:

[Creag Dhubh - Dalmally 275kV Connection \(ssen-transmission.co.uk\)](https://www.ssen-transmission.co.uk)

1.8.4 The EIA Report can also be viewed via the Energy Consents Unit's (ECU) website:

www.energyconsents.scot

1.8.5 This EIAR is available in other formats if required. For details, including costs, please contact:

Caitlin Quinn

Community Liaison Manager

caitlin.quinn@sse.com

Comments

1.8.6 Any representations to the s37 consent application may be submitted via:

- the Energy Consents Unit website at www.energyconsents.scot/Register.aspx;
- by email to the Scottish Government, Energy Consents Unit mailbox at representations@gov.scot; or

- by post to the Scottish Government, Energy Consents Unit, 4th Floor, 5 Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU.
- 1.8.7 Written or emailed representations should be dated, clearly stating the name (in block capitals), full return email and postal address of those making representations, identify the Proposed Development (Creag Dhubh to Dalmally 275kV Connection) and specify the grounds for representation. Only representations sent by email to representations@gov.scot will receive acknowledgement. All representations should be received **60 days from date of validation**, although Ministers may consider representations received after this date.
- 1.8.8 The validation date will be available on the ECU website at www.energyconsents.scot/Register.aspx and the SSEN project website at [Creag Dhubh - Dalmally 275kV Connection \(ssen-transmission.co.uk\)](http://Creag Dhubh - Dalmally 275kV Connection (ssen-transmission.co.uk)).