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**The Scottish Government
Energy Consents Unit**

**Scoping Opinion On Behalf Of Scottish Ministers Under The
Electricity Works (Environmental Impact Assessment) (Scotland)
Regulations 2017**

**Creag Dhubh to Dalmally 275kV Connection
Scottish Hydro Electric Transmission PLC**

8 March 2022

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1. Introduction

1.1 This scoping opinion is issued by the Scottish Government Energy Consents Unit on behalf of the Scottish Ministers to Scottish Hydro Electric Transmission PLC a company incorporated under the Companies Acts with company number SC213461 and having its registered office at Inveralmond House, 200 Dunkeld Road, Perth, PH1 3AQ (“the Company”) in response to a request dated 16 December 2020 for a scoping opinion under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 in relation to the proposed Creag Dhubh to Dalmally 275kV connection (“the proposed development”). The request was accompanied by a scoping report.

1.2 The proposed development is part of a wider scope of works to upgrade the transmission network in eastern Argyll and is located adjacent to the existing Scottish Power Energy Networks (“SPEN”) 275 kV overhead line from Dalmally to Inverarnan. It will link the proposed Creag Dhubh substation and the proposed Glen Lochy switching station.

1.3 The nearest settlements to the proposed Development are Dalmally and Loch Awe. There are also smaller clusters of development at Cladich to the south and along the shore to Ardbrecknish, with further properties scattered along either side of the loch and a small number of isolated properties in the edges of the upland areas.

1.4 The roads within the study area (A85, A819, B840, B8074 and B8077) generally follow the main valleys and the shoreline of Loch Awe and are all used by tourists, although the B8074 and B8077 less so than the others. The railway to Oban runs parallel to the A85. There are walking and cycling routes, visitor attractions and activities throughout the area including Kilchurn Castle, St Conan’s Kirk, Ben Cruachan and Beinn Eunaich, and Loch Awe itself.

1.5 The proposed development would consist of a 13.8 kilometres of 275 kV overhead line and necessary ancillary works required to facilitate its construction and operation including access tracks, temporary construction compounds, woodland removal.

1.6 The Company states that the proposed development would not have a fixed operational life, assuming 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 assessment is proposed as part of the EIA Report.

1.7 The proposed development is solely within the planning authority of Argyll and Bute Council.

2. Consultation

2.1 Following the scoping opinion request a list of consultees was agreed between the applicant and the Energy Consents Unit. A consultation on the scoping report was undertaken by the Scottish Ministers and this commenced on 9 February 2021. The consultation closed on 3 March 2021. Extensions to this deadline were granted to Argyll and Bute Council, Scottish Environment Protection Agency (SEPA) and Historic Environment Scotland (HES). The Scottish Ministers also requested responses from their internal advisors Transport Scotland and Scottish Forestry. Standing advice from Marine Scotland Science (MSS) has also been provided.

2.2 It is noted that the request for the scoping opinion and accompanying report submitted set out that the proposed development was at two stages of development. The project description in the scoping report included a hybrid of proposed alignment for part of the OHL route (Creag Dhubh substation and Tower 33). No detail of a preferred alignment between Tower 33 and Glen Lochy Switching Station was provided, the Scoping report noting that the indicative proposed alignment for the full length of the OHL was to be developed following further consultation in February 2021.

2.3 Additional information was provided by the Applicant in June 2021 in regards to Alignment selection – Connection to Proposed Glen Lochy Switching Station, Creag Dhubh Substation and project update. Further comments from consultees were sought on this additional information in February 2022 and these have been feed into this Scoping Opinion.

2.4 All consultation responses received, and the standing advice from MSS, are attached in **ANNEX A Consultation responses**.

2.5 The purpose of the consultation was to obtain scoping advice from each consultee on environmental matters within their remit. Responses from consultees and advisors, including the standing advice from MSS, should be read in full for detailed requirements and for comprehensive guidance, advice and, where appropriate, templates for preparation of the Environmental Impact Assessment (“EIA”) report.

2.6 Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisors.

2.7 No responses were received from: Scottish Forestry, Civil Aviation Authority – Airspace, John Muir Trust, Mountaineering Scotland, Scottish Wildlife Trust, Scottish Wild Land Group (SWLG), Sustrans, Visit Scotland, National Grid, Network Rail, West of Scotland Archaeology Service and Dailly Community Council.

2.8 With regard to those consultees who did not respond, it is assumed that they have no comment to make on the scoping report, however each would be consulted again in the event that an application for section 37 consent is submitted subsequent to this EIA scoping opinion.

2.9 The Scottish Ministers are satisfied that the requirements for consultation set out in Regulation 12(4) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 have been met.

3. The Scoping Opinion

3.1 This scoping opinion has been adopted following consultation with Argyll and Bute Council, within whose area the proposed development would be situated, NatureScot (previously “SNH”), SEPA and HES, all as statutory consultation bodies, and with other bodies which Scottish Ministers consider likely to have an interest in the proposed development by reason of their specific environmental responsibilities or local and regional competencies.

3.2 Scottish Ministers adopt this scoping opinion having taken into account the information provided by the applicant in its request dated 16 December 2020 and information available at today’s date in respect of the specific characteristics of the proposed development and responses received to the consultation undertaken. In providing this scoping opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific characteristics of the proposed development, the specific characteristics of that type of development and the environmental features likely to be affected.

3.3 A copy of this scoping opinion has been sent to Argyll and Bute Council for publication on their website. It has also been published on the Scottish Government energy consents website at www.energyconsents.scot.

3.4 Scottish Ministers expect the EIA report which will accompany the application for the proposed development to consider in full all consultation responses attached in **Annex A**.

3.5 Scottish Ministers are satisfied with the scope of the EIA set out at Sections 4 to 12 of the Scoping Report.

3.6 In addition to the consultation responses, Ministers wish to provide comments with regards to the scope of the EIA report. The Company should note and address each matter.

3.7 Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.

3.8 Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.

3.9 MSS provide generic scoping guidelines for both onshore wind farm and overhead line development (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

3.10 In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.

3.11 Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at <http://www.gov.scot/Publications/2017/04/8868>, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.

3.12 The scoping report identified viewpoints at Table 12.2 to be assessed within the landscape and visual impact assessment. Ministers note that Section 12 of the scoping report sets out that a study area of 10km from the proposed alignment would be adopted for the LVIA in order to ensure that significant impacts are assessed in line with current guidance. Please note Argyll and Bute Council and HES responses requesting additional viewpoint locations.

3.13 Ministers expect Company's to carry out adequate pre-application consultation and to demonstrate what alternatives to the proposal were considered before arriving at the design they apply for. Ministers agree with the Planning Authority that the EIA should include a description of the reasonable alternatives (in terms of project design (including undergrounding), technology, location, size and scale) studied by the developer, which are relevant to the proposal and its specific

characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

3.14 The EIA report should explore and include the results of the community consultation exercises undertaken to date and potential visual impacts and impacts on communities where these have been identified through consultation feedback from affected communities or the routeing process (such as 'pinch points' or cumulative effects on sensitive receptors). The EIA report should also consider any further 'non committed' mitigation measures to be implemented during the post consent period such as improvements to landscape amenity, together with those which have been discounted.

3.15 Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.

4. Mitigation Measures

4.1 The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.

5. Conclusion

5.1 This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at the date of this scoping opinion. The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 37 consent for the proposed development.

5.2 This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.

5.3 Without prejudice to that generality, it is recommended that advice regarding the requirement for an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.

5.4 It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this.

5.5 Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit at the pre-application stage and before proposals reach design freeze.

5.6 Applicants are reminded that there will be limited opportunity to materially vary the form and content of the proposed development once an application is submitted.

5.7 When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.

5.8 It should be noted that to facilitate uploading to the Energy Consents portal, the EIA report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes (MB). In addition, a separate disc containing the EIA report and its associated documentation in electronic format will be required.

Rebecca Young
Energy Consents Unit
8 March 2022

ANNEX A

Consultation

List of consultees

- Argyll and Bute Council
- SEPA
- NatureScot
- HES
- Fisheries - Argyll District Salmon Fisheries Board
- British Telecommunications plc
- Civil Aviation Authority – Airspace*
- Defence Infrastructure Organisation/Ministry of Defence
- Glasgow Prestwick Airport
- John Muir Trust*
- Mountaineering Scotland*
- NATS Safeguarding
- RSPB Scotland
- Scottish Rights of Way and Access Society (ScotWays)
- Scottish Water
- Scottish Wildlife Trust*
- Scottish Wild Land Group (SWLG)*
- Sustrans*
- Visit Scotland*
- National Grid*
- Network Rail*
- West of Scotland Archaeology Service*
- Dailly Community Council*

*No response was received.

Internal advice from areas of the Scottish Government was provided by officials from Transport Scotland and Marine Scotland (in the form of standing advice from Marine Scotland Science). No advice was received from Scottish Forestry.

Argyll and Bute Council
Comhairle Earra Gháidheal agus Bhóid



Development and Economic Growth

Acting Director: Kirsty Flanagan

Helensburgh and Lomond Civic Centre, 38 East Clyde Street, Helensburgh G84 7PG
Tel: 01546-605-552

1 July 2021

Our Ref.: 21/00286/SCOPE

ECU Ref.: ECU00002199

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Helensburgh and Lomond Civic Centre
38 East Clyde Street
Helensburgh, G84 7PG

Dear Sir / Madam

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017.

Scoping Opinion Consultation Response - Proposal to construct and operate a 13.8 kilometre (km) double circuit 275 kV overhead line (OHL), supported by lattice steel towers between a proposed substation at Creag Dhuhb to a new switching station in Glen Lochy adjacent to the existing Scottish Power Energy Networks (SPEN) 275 kV overhead line from Dalmally to Inverarnan, in Argyll.

I write in reference to your consultation regarding the above and would thank you for agreeing to extend the response period. Please note that at time of writing the internal consultee responses remain outstanding due to an administrative oversight in validating the current scoping consultation request. These will be forwarded for your attention once available.

The additional information providing further clarification on proposed alignment options from tower 33 to the proposed Glen Lochy switching station, submitted to Planning Officers on 19.6.21, has been noted and taken into consideration in framing this scoping consultation response. That this scoping request is a hybrid of proposed alignment for part of the route, and route corridor with alignment options (GL1 – GL5) for the remainder of the route, is somewhat unusual. The Scottish Ministers are requested to consider whether this “hybrid approach” is procedurally appropriate in seeking a scoping opinion due to the imprecision of part of the actual proposed route alignment from tower 33 to the proposed switching station.

It should be clarified that the issuing of this scoping consultation advice should not be taken to indicate support for the proposal on the part of Argyll & Bute Council. The Council’s conclusions on any future application would rely upon the consideration of the content of any accompanying environmental information, the responses of consultees, the views of third parties and any other material planning considerations.

Please note that in terms of the Council’s *‘Argyll and Bute Local Development Plan’* (adopted 2015) and associated Supplementary Guidance, Argyll & Bute Council will support renewable energy developments where these are consistent with the principles of sustainable development and it can be adequately demonstrated that there would be no unacceptable significant adverse effects, whether individual or cumulative, including on local communities, natural and historic environments, landscape character and visual amenity, and that the proposals would be compatible with adjacent

land uses. The Council Acknowledges the vital roll transmission upgrades play in transferring renewable energy from generation to users. Proposals will be assessed against the following criteria:

- Net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.
- The scale of contribution to renewable energy provision.
- Effect on greenhouse gas emissions.
- Cumulative impacts arising from all of the considerations below.
- Impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker.
- Landscape and visual impacts, including effects on wild land.
- Effects on the natural heritage, including birds.
- Impacts on carbon rich soils, using the carbon calculator.
- Public access, including impact on long distance walking and cycling routes and those scenic routes identified in the NPF.
- Impacts on the historic environment, including scheduled monuments, listed buildings and their settings.
- Impacts on tourism and recreation.
- Impacts on aviation and defence interests and seismological recording.
- Impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised.
- Impacts on road traffic.
- Impacts on adjacent trunk roads.
- Effects on hydrology, the water environment and flood risk.
- The need for conditions relating to the decommissioning of developments, including ancillary infrastructure, and site restoration.
- The need for site restoration.

The *'Argyll & Bute Landscape Wind Energy Capacity Study'* (2017) is also a material consideration in the Council's consideration of large scale renewable infrastructure applications in that it evaluates the landscape character and sensitivities of an area. Although produced to primarily assist in evaluating windfarm proposals, the landscape character analysis contained within this document will be a material planning consideration in evaluating the ability of the landscape to absorb S37 developments and identify areas of sensitivity such as transitional and/or sensitive landscape areas.

That this infrastructure investment is generally supported by NPF3, SPP, LDP and other policies of the Council, does not detract from the need to ensure that significant environmental and landscape impacts are minimised, and also that any potential impacts on sensitive receptors are carefully considered in determining any future S37 application under the Electricity Act.

Should you require anything further please do not hesitate to contact me.

Yours sincerely

David Moore
Senior Planning Officer
Major Applications Team
Development & Infrastructure

SCOPING CONSULTATION RESPONSE ON BEHALF OF ARGYLL & BUTE COUNCIL

PROPOSAL: proposing to construct and operate a 13.8 kilometre (km) double circuit 275 kV overhead line (OHL), supported by lattice steel towers between a proposed substation at Creag Dhubh to a new switching station in Glen Lochy adjacent to the existing Scottish Power Energy Networks (SPEN) 275 kV overhead line from Dalmally to Inverarnan, in Argyll.

THE PROPOSAL

The proposed development will link the proposed Creag Dhubh substation (CDS) and the proposed Glen Lochy switching station (GLSS). SSEN have clarified in their submissions that the proposed S37 development is limited to the 13.8 km OHL and necessary ancillary works required to facilitate its construction and operation (e.g. access tracks, temporary construction compounds, woodland removal). The proposed CDS and proposed GLSS will be the subject of separate planning applications.

Following any consent SSEN confirm that the investigation of sub-surface and geotechnical conditions at proposed tower locations will be undertaken and may result in the requirement for additional adjustments (micro siting) in the tower locations or heights. It is proposed that the application for consent (and the EIA Report) will be based on the proposed alignment and detailed tower schedule, subject to agreed horizontal limits of deviation (LOD) to allow for flexibility in the final siting of individual towers and access tracks, up to 100 m from the proposed tower locations. Similarly, the tower height may vary from the tower schedule proposed, and therefore would be subject to a vertical limit of deviation, provisionally up to 20% variation based on the tower schedule.

It is noted that as the proposed Creag Dhubh substation and Glen Lochy switching station will be brought forward by SSEN and operate under their control. It has been clarified that a cumulative LVIA evaluation will be carried out in the LVIA for the OHL to include these future development proposals which will be subject to separate planning applications.

CONSIDERATION OF ALTERNATIVES

The EIA should include a description of the reasonable alternatives (in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposal and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

This should include the results of the community consultation exercises which have been undertaken at time of submission of the S37 application. This should include information on the alignment choice from tower 33 to the proposed GLSS (which at time of writing is understood to still be subject to community consultation) prior to a final alignment being chosen within the preferred route corridor.

The scale and layout of the development should be designed so as to minimise the impact of the development upon key environmental features, significant views and sites designated for their ecological/historical or scenic qualities. It is noted from the EIA Scoping Report that the design iteration process will take account of environmental and technical factors to establish the final layout for the proposal, and that key sensitivities will be taken into account.

BUILT ELEMENTS

The new OHL will be constructed using self-supporting fabricated galvanised steel lattice towers, L8(c) series that are on average 50 metres (m) high and separated by an average distance of 280 m. The application will be based on a proposed schedule of tower types, heights and locations, which will be used for the purpose of preparing the EIA Report. The spacing (span length) between towers and the tower height would vary depending on environmental and engineering constraints with maximum height of approximately 60 m and maximum span length of 350 m. Each tower would carry two circuits, with three horizontal cross arms on each side of the tower, each carrying an

insulator string and two conductors. An earth wire, containing an optical fibre ground wire (OPGW), would be strung between the tower peaks.

The EIA should identify the location of all built elements, including access tracks and any related and required borrow pits to facilitate access track provision, both temporary and permanent, which should be sited to avoid habitats of importance, wetlands, areas of deep peat and blanket bog, watercourses and abstractions, in order that areas of particular vulnerability to damage from development, or which have higher pollution sensitivity, may be protected from unnecessary impacts associated with the development. The assessment should address the construction, operational and decommissioning phases of the development. It should also be noted that the Council would expect the access to/from the site to the junction with the public road to be included within the site edged red.

It is noted that substantial detail on this has been provided at Section 2.5 of the scoping report submitted. The acknowledgement of the need for a CEMP to be provided should consent be granted is welcomed. However sufficient details should be provided within the EIA to clarify where any engineering operations, including formation of access tracks and roads junctions are required with final details being subject to CEMP and a traffic management plan (TMP).

PLANNING POLICY CONTEXT

The EIA will require to take into account of applicable legislation, policy and guidance in relation to renewable energy.

The following documents should also be given due weight in the policy evaluation of the proposal

- NPF3
- SPP
- Argyll and Bute Energy Action Plan
- Argyll and Bute Landscape Wind Energy Capacity Study (Capacity Study 2017);
- SNH (1996) Landscape Assessment of Argyll and the Firth of Clyde (Review No78)
- Argyll and Bute Woodland and Forestry Strategy
- Scottish Government Policy Document on Control of Woodland Removal.

Any route option proposed as part of a S37 application should also have regard to any specific land use allocations within the adopted LPD 2015.

Although at a relatively early stage in its development and currently therefore being afforded limited weight, your attention is drawn to the emerging LDP 2. Depending upon the date of any future application this may have reached a stage in the adoption process where the weight to be afforded to this will be increased. Therefore the applicants should ensure that the status and weight to be afforded to the policies and land use allocations/designations in this emerging LDP 2 document are both considered, and given appropriate weight, in any policy evaluation.

Depending upon the time of submission, the Planning Authority wish commentary provided to any confirmed changes to the support within the current SPP for the “presumption in favour of sustainable development” to form part of the policy submission, notwithstanding that the driver for the proposed change relates to the application of the “Tilted Balance” associated with HNDAs and housing developments based upon recent case law. The proposed alteration in wording, if confirmed and applied to the SPP, would seem to have potential have relevance for all development proposals which seek to present their “sustainable nature” as a factor which provides policy presumption in principle for their approval under SPP policy advice. This matter can be discussed at time of submission to clarify whether any changes to SPP have been made which are material to the proposals policy context.

DECOMMISSIONING

It is noted that the EIA scoping report addresses this matter at section 2.6 (Phase 4) stating:

Following commissioning of the Proposed Development, all construction sites will be reinstated. Reinstatement will form part of the contract obligations for the Principal Contractor and will include the removal of all temporary access tracks, all work sites around the tower locations and the re-vegetation of all construction compounds.

The Planning Authority is satisfied with this approach and the CEMP can provide for more detailed restoration proposals in respect of any temporary access tracks or construction works.

LANDSCAPE & VISUAL AMENITY

It is noted from the Scoping Report that the aim of the landscape and visual impact assessment (LVIA) is to identify, predict and evaluate potential landscape and visual effects arising from the proposed development and associated ancillary elements. The main elements of LVIA are set out at Chapter 12 of the Scoping Report.

The Planning Authority welcomes the recognition at 12.1 that:

The scale and location of the OHL is such that it is likely to be visible from locations out with the immediate site boundary, across the wider study area. Consequently, there is potential for effects on visual amenity and landscape character. The LVIA would address the potential impacts on the Site itself, and the potential for impacts on landscape and visual receptors within the study area.

The approach set out at 12.2 to have a study area of 10KM from the proposal is considered reasonable as transmission lines are far less visible over longer distances than other developments such as large S36 windfarms.

The Preliminary ZTV is noted as a reasonable basis to proceed with the understanding that if, as the development evolves and discussions ensue, additional visual receptors can be considered and factored in. It is confirmed that the LVIA will contain:

- *A description of the methodology utilised in completing the assessment;*
- *A description of the existing landscape and visual baseline context and cumulative context at the time of completion of the LVIA;*
- *A description of impact generator associated with the construction and operation of the type of development proposed and their potential effects on receptors;*
- *A description of micro siting of towers and design priorities and any mitigation measures proposed to address likely significant effects; and*
- *An assessment of residual landscape and visual effects, including cumulative effects and effects on night character, considering the influence of design responses and mitigation measures.*

This approach is considered acceptable by the Planning Authority. The Planning Authority also considers the approach set out at 12.3.1 - 12.3.4 to be acceptable.

In respect of Para 12.4 and identification of baseline landscape characteristics. The baseline study should have regard to:

- *Argyll and Bute Landscape Wind Energy Capacity Study (Capacity Study 2017);*
- *SNH (1996) Landscape Assessment of Argyll and the Firth of Clyde (Review No78)*

It is noted that the EIA scoping report identifies the proposals as being located wholly within Craggy Upland (LCT 40) and that the characteristics of this and potential impacts will be addressed in the LVIA.

Designations

Taking the 10KM ZTV a number of designations require to be considered, and it is noted that these are set out at Figure 12.4 and table 12.1.

Ben More and Glen Coe National Scenic Area (NSA) lies approximately 8.3 km from the northern end of the Proposed Development. However, only a small portion of the most southwestern spur of the designated area extends into the study area, covering the summit of Beinn nan Lus and Monadh Liath. A section of the northwest border of the Loch Lomond and Trossachs National Park (LLTNP) extends into the western edge of the study area. The Park extends to the summit of Meall nan Tighearn and it is this part which is found within the study area. This extent of the LLTNP is classified as being within the Breadalbane Landscape Area⁵⁸.

There are two Wild Land Areas (WLA) within the identified study area: These are:

- (06) Ben Lui; and
- (09) Loch Etive Mountains.

The North Argyll Area of Panoramic Quality (APQ) covers a large area from Kilchrenan in the east to Glen Lochy in the west and Glen Kinglas in the north to Glen Orchy and Glen Lochy in the west. The Proposed Development falls entirely within the APQ. It is noted that the applicants state that;

There is not any publicly available documentation or citation setting out the special qualities of the area or the reasons for its designation.

In this context that applicants are advised to have regard to the submissions and findings of the S36 Public Inquiry for Upper Sonachan Wind Farm where the characteristics of the APQ and, in particular, the qualities of the Eastern head of Loch awe as a gateway location of national importance was set out in some detail. This decision is available on the ECU website (REF: EC00002081).

Viewpoints – In addition to the viewpoints listed at Table 12.2 and indicated on figure 12.5, the Planning Authority recommends that the following additional viewpoints are provided:

- From the Oban railway line in vicinity of “Brackley” and also towards the proposed Glen Lochy switching station (as part of cumulative impact assessment)
- From the curtilage of Brackley towards the towers
- Viewpoints to south and west from Duncan Ban Monument
- From the old military road
- Viewpoint 18 should look to north east and north west.
- Viewpoint 19 should look to north east and north west

The Council understands that the advice of NatureScot and Historic Environment Scotland, will also be sought in regard to appropriate viewpoints. Subject to the above advice being taken into consideration, the Council is satisfied with the intended approach.

Proposed Creagh Dhub Substation and Glen Loch Switching Station

It is noted that these will be scoped into the LVIA in respect of the consideration of cumulative impacts. This approach is supported.

The principle consideration should be to ensure that the proposed CDS and GLSS locations assimilate into the landscape to the greatest degree possible. It is noted that there are elements of commercial forestry of various ages around the proposed locations, and therefore the future felling and potential increased landscape impacts associated with this expected, and predictable, felling regime should be factored into landscaping proposals for both developments.

To mitigate commercial felling increasing landscape impact SSEN should ensure provision of adequate land around any switching station site for peripheral and permanent landscaping, (to include mixed woodland tree planting with biodiversity objectives). This would ensure that irrespective of the commercial felling regime taking place in the locality in future years that the CDS and GLSS will integrate into the landscape and minimise visual impacts.

ORNITHOLOGY /BIODIVERSITY/ ECOLOGY

It is noted that field surveys have been undertaken by WSP ecologists between May 2016 and September 2017. The surveys included a Flight Activity Survey (FAS); Black Grouse Survey, Breeding Scarce Raptor Survey; Breeding Bird Survey; and Breeding Diver.

It is noted, that based upon the previous survey findings and a desk top study the following ornithological features are proposed to be scoped into the EIA in respect of potential significant impacts;

- *designated sites, where qualifying species have potential connectivity with the Proposed Development and where surveys recorded flights of qualifying species within the Proposed Development, i.e. Glen Etive and Glen Fyne SPA. This area is protected under the European Commission Council Directive 2009/147/EC (Birds Directive), which places importance on the protection of habitats for endangered and migratory species. Designated sites are also protected under Council Directive 92/43/EEC (Habitats Directive);*
- *Golden eagle, included on Schedule 1 of the Wildlife and Countryside Act 1981;*
- *Hen harrier, included on Schedule 1 of the Wildlife and Countryside Act 1981 and are a red-listed species of bird of conservation concern;*
- *Peregrine, included on Schedule 1 of the Wildlife and Countryside Act 1981*
- *Merlin included on Schedule 1 of the Wildlife and Countryside Act 1981 and are a red-listed species of conservation concern;*
- *Osprey, included on Schedule 1 of the Wildlife and Countryside Act 1981 and are an amber-listed species of conservation concern;*
- *White-tailed eagle, included on Schedule 1 of the Wildlife and Countryside Act 1981 and are a red-listed species of conservation concern;*
- *Wintering wildfowl and waders, susceptible to collision with powerlines, several species which are included on Schedule 1 of the Wildlife and Countryside Act 1981, such as greylag goose. Several species of which are amber listed species of conservation concern (Greylag goose, mallard, oystercatcher, snipe, common sandpiper, great black-backed gull) and curlew are a red-listed species of conservation concern; and*
- *Black grouse are a red-listed species of conservation concern.*

The Proposed Development is bordered to the north and south-west by the Glen Etive and Glen Fyne SPA, designated for breeding golden eagle as shown on figure 5.5. The Proposed Development passes to the west of the SPA. Under the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 (Habitat Regulations) it will be necessary to consider whether the Proposed Development will have likely significant effects upon the SPA. It is noted that a Habitat Regulations Appraisal (HRA) screening assessment will be undertaken during the EIA reporting process to identify any likely significant effects of the proposed development on the SPA.

A Considerable amount of the historic survey information has been undertaken at route selection stage and a considerable time ago. At time of submission, historic surveys should be updated at the optimum time of year to inform the EIA.

It is noted that at Para 5.3.6 it is confirmed that:

The ornithological impact assessment would be completed in accordance with the Chartered Institute of Ecological and Environmental Management (CIEEM) Ecological Impact Assessment Guidance³⁷. The assessment will use the ornithological baseline to identify the IEF's that could be affected by the construction of the Proposed Development. IEFs will be assigned a geographic level of importance based on their conservation status and population/assembly trends and other relevant criteria (including size, naturalness, rarity and diversity). Details of the Proposed Development will then be used to assess what level of effect each feature is likely to receive and whether that impact will be beneficial or adverse, significant or

negligible, and temporary or permanent. Where appropriate, mitigation measures would be recommended to remedy any adverse impacts. An assessment of residual effects and cumulative effects would then be undertaken and reported within the EIA Report.

It is also noted and agreed that collision risks will be discussed and agreed with Nature Scot and a method statement provided as part of the EIA submission.

Appropriate Assessment

The matters set out in respect of this are noted and this will be a matter between the applicant and the Scottish Ministers as appropriate authority on this matter.

Non- Avian Ecology

The submitted EIA Scoping Report confirms that the proposed development is situated predominantly on coniferous plantation woodland and open moorland as well as wet habitats associated with the western Atlantic climate. These wet habitats thus have potential for GWDTEs, which have been identified through the NVC surveys. Characterisation of the vegetation through NVC surveys has also identified the potential for Annex I and SBL habitats. These ecological features may be affected by excavation and vegetation clearance works during construction. These potential effects should be considered in further detail within the EIA to establish the potential for significant impacts and identify appropriate mitigation.

Suitable habitat for otter, water vole, bat, badger, red squirrel, pine marten, reptiles and marshy fritillary has been identified within the route by the applicant's experts. It is clarified that the EIA Report will identify where species require to be safeguarded through further pre-construction surveys informing appropriate mitigation prior to construction. This information can be captured and administered through a CEMP and SSEN Transmission's Species Protection Plans (SPP's) prior to and during construction and audited by an ECoW during and post-construction. The Planning Authority is in agreement with this approach which has been successfully used on other S37 projects in the area.

It is noted that the applicants confirm that:

Red squirrel and pine marten may be negatively affected by the Proposed Development during construction and operation. This is due to large areas of coniferous woodland in the southern section of the Indicative Proposed Alignment being dissected by the Proposed Development. This is considered to result in permanent habitat loss, fragmentation and severance. GWDTEs, Annex I and SBL habitats cross large areas of the Site and will be affected by excavation and vegetation clearance works. These potential effects will be considered in further detail within the EIA to establish the potential for significant impacts and identify appropriate mitigation.

Paragraph 5.3.5 confirms that:

Both permanent and temporary habitat loss and habitat modification due to vegetation management or hydrological change would be assessed in the chapter dealing with non-avian ecology. The levels of habitat loss and / or modification associated with tower and track construction and operational are low and are not considered to represent a likely significant loss and / or modification of bird habitat.

This is considered to be satisfactory by the Planning Authority

General Comment

All surveys should be carried out at the optimum time of year by a suitably qualified person and include mitigation. Links to: A Biodiversity Technical Note for Planners and Developers, Argyll & Bute Council, February 2017 and Pollinators in Planning and Construction, A brief guide for the development sector, Scottish Natural Heritage, August 2019 are provided below:

https://www.argyll-bute.gov.uk/sites/default/files/biodiversity_technical_note_feb_2017_4.pdf

<https://www.nature.scot/sites/default/files/2019-09/Pollinators%20in%20Planning%20and%20Construction%20Guide.pdf>

The applicant is advised to follow the good practice set out in these documents. Please note that the views of the Councils biodiversity officer are awaited and will be forwarded in due course.

GEOLOGY, SOILS AND PEAT

The preferred OHL alignment between T1 and T33 is predominantly comprised of either 'Class 5' soils where it crosses commercial plantation, or areas where no peatland or carbon rich soils are mapped. Small areas of 'Class 2' and 'Class 3' soils are present in the areas south of Cladich, and north of the Allt Fearnha burn.

NatureScot carbon rich soils, deep peat and priority habitat mapping⁴⁵ shows the area between T33 and Glen Lochy as predominantly 'Class 5' soils, particularly in areas covered by commercial plantation, which are defined as mineral or peat soils with no peatland vegetation. Large areas of 'Class 2' and 'Class 3' soils are present in the open areas around Creag a'Mhaol-diridh which are not dominated by commercial plantation. Class 2 soils are of national importance and are defined as peat soils with high potential to be restored to peatland.

The EIA scoping report confirms that peat is the main sensitive receptor which will be considered in the EIA. Peat is considered in relation to ground stability risk assessment, assessment of peat volumes, reuse of excavated peat and minimisation of waste. This would be linked to the carbon calculator to assess impacts of the scheme on peat removal. Where there are interactions between peat issues and hydrology and ecology, liaison with these disciplines will be undertaken.

It is confirmed that the EIA will address:

...the potential to result in the disturbance, loss or erosion of peat. The design of the Proposed Development would avoid the presence of peat and carbon rich soils where practicable. Where this is not possible the design will consider minimising the potential effects on peat through:

- • *avoiding areas of deeper peat,*
- • *implementing suitable mitigation measures for reducing peat generation, and*
- • *implementing appropriate measures for storage and re-using carbon rich soils.*

This will be summarised as part of an outline Peat Management Plan (PMP) to be provided with the EIA Report, with a more detailed PMP developed prior to construction.

The Council is supportive of this approach. The applicant proposes to scope out undertaking a Contaminated Land Assessment. Although this would seem reasonable, given the nature of the proposed route on undeveloped land, final agreement to this will be dependent on the views of the Environmental Protection Division which are currently awaited as they may have relevant local knowledge.

NOISE AND VIBRATION

Construction Noise and Vibration - Typical construction activities and work methods should be set out in the EIA Report. Information should also be provided on proposals for any forestry removal, an indicative construction programme, construction traffic generation and construction phasing. The EIA Report or CEMP should also contain details of appropriate environmental management measures, including pollution prevention measures (in line with Scottish Environment Protection Agency (SEPA)'s Pollution Prevention Guidelines (PPGs) and Guidance for Pollution Prevention (GPPs), and waste minimisation and management measures.

The impact of any blasting should be undertaken to allow the extraction of stone for wider construction activities should be considered within the Environmental Impact Assessment.

It should be noted that the views of the Council's Environmental Protection Officer are awaited.

Lighting - The applicant should consider the potential for light pollution during the construction phase on any nearby sensitive properties. Where such an impact is likely to be significant, they should outline their proposed mitigation measures within the Environmental Impact Assessment.

CULTURAL HERITAGE

Given that a final alignment has not been provided for the route from tower 33 to the proposed Glen Lochy switching station the potential route would take the line within close proximity to the Duncan Ban Monument. Although the line would be at a lower level than the monument it is considered that the scale and proximity of the line could be harmful to the setting of this Category B Listed Building,

As a local high point the setting and character of the monument is sensitive to what could be large industrial scale infrastructure in close proximity to it. The Council will have regard to the views of HES on this matter once the final alignment and design details have been finalised. It is considered that the potential impact on the Duncan Ban Monument should be specifically scoped into the EIA and addressed in some detail.

Response is awaited at time of writing from WoSAS, although it is noted from recent responses that they have limited access to their data bases due to working from home. Further information on this matter will be provided when available.

TRAFFIC, TRANSPORT AND ACCESS

It is noted from the Scoping Report that a Transport Assessment (TA) will be provided to review the impact of transport related matters associated with the proposal and will be included within the Transport and Access Chapter of the EIA Report. It is also noted that an abnormal load assessment and cumulative assessment will be included.

Paragraph 2.7 of the Scoping Report States

The construction will give rise to regular numbers of staff transport movements, with small work crews travelling to work site areas. It is anticipated that the Principal Contractor will identify a single main compound area, with a safe area for parking away from the public highway.

Vehicle movements will be required to construct new or upgraded access roads; deliver the foundation and tower components and conductor materials to site; deliver and collect materials and construction plant from the main site compound and to individual tower locations.

The EIA Report would provide a summary of the total anticipated traffic movements associated with construction of the proposed development, broken down by phases.

In respect of the required Traffic Management Plan, it is not considered acceptable for this to be produced and submitted in advance of the exploration and evaluation of the use of borrow pits to source local construction materials associated with the project. If the use of borrow pits is not considered sufficiently early to form part of the submitted TMP this is in the opinion of the Planning Authority contrary to fundamental principles as set out at Para 2.9 which states;

The EIA Regulations require the consideration of the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources. The Proposed Development will use land and the permanent footprint of the Proposed Development will be described in the EIA Report. Other than the change of land use, given the nature of the Proposed Development, there would be a negligible or no demand for natural resources during the operational life of the OHL and therefore no likely significant effect on the sustainable availability of such resources.

The EIA should both clarify and commit SSEN to the exploration of the use of borrow pits in advance of the submission of any TMP, and a condition requiring a phased approach to this exercise to seek to reduce traffic movements and movement of construction materials long distances by road is considered appropriate.

Further details of the proposed condition will be provided in the Officer's Report to Members to allow consideration of this matter. This matter is subject to informal discussions with SSEN at time of writing as it has wider implications for ongoing and likely projects within Argyll and Bute.

HYDROLOGY and HYDROGEOLOGY

The contents of Paragraphs 8.1 to 8.6 are noted. The conclusions as set out at Paragraph 8.6 that:

...it is proposed that a focused hydrological and hydrogeological impact assessment be provided. Technical reports will be provided to inform the design (primary mitigation) and to ensure that the requirements of the statutory consultees are fully met as follows:

- *Watercourse Crossing Assessment;*
- *GWDTE Assessment (if required); and*
- *Groundwater / Private Water Abstraction Protection (if required).*

This is considered acceptable to the Planning Authority.

RISK OF MAJOR ACCIDENTS AND/OR DISASTERS

Given the nature of the proposal it is considered that the clarification of normal operational safeguards in respect of construction and operation of a high voltage transmission line (and associated infrastructure such as GLSS and CDS) should be sufficient to address this matter and effectively this can be scoped out.

SUMMARY

Table 13.1 provides a summary of the EIA scoping report and clarifies what issues are proposed to be scoped in and out of the EIA. The Planning Authority is in general agreement with the conclusions of this. However the Planning Authority defers to the views of other consultees in respect to their relevant field of expertise, and in particular Scottish Nature and Historic Environment Scotland. It should also be noted that outstanding internal consultation responses will require to be considered when available.

David Moore
Senior Planning Officer
Major Applications
16.6.2021

Consultations undertaken. Responses awaited.

Argyll & Bute Council Local Biodiversity Officer
Argyll & Bute Council Environmental Health Officer
Argyll & Bute Council Area Roads Engineer
Argyll & Bute Council Archaeological Advisors the West of Scotland Archaeology Service

Mcgroarty K (Kirsty)

From: Planning.North <Planning.North@sepa.org.uk>
Sent: 03 March 2022 09:08
To: Young R (Rebecca)
Cc: jackie.taylor@sse.com
Subject: 4427 - Scoping - Request for any further comments Creag Dhubh to Dalmally 275 kV Connection

Categories: Creag Dhubh to Dalmally

OFFICIAL

SEPA email response 4427

Dear Ms Young

Creag Dhubh to Dalmally 275 kV Connection

Thank you for your consultation email below providing the opportunity for SEPA to give further scoping comments on the above project. I note that the submission referred to provides further information on the preferred alignment from Tower 28 to the proposed Glen Lochy switching station and it gives an update on the switching station itself and related Creag Dhubh substation.

In relation to the aspects of the new report that relate to the overhead line then we note that the preferred option, GL5, has the least impact on blanket bog peat habitats, which is welcome. The indicative locations of towers also seem to have a significant buffer to watercourses, which is also positive. The final layout should be shown to avoid impacts on the deepest peat, best quality peatland and GWDTE wetland habitats. Impacts from construction activities should be considered as part of this. Proposal for habitat restoration are noted, and again welcomed.

In relation to other aspects of the project (which I appreciate you are not interested in, but I have copied in Jackie) then I am not sure what stage in the planning process they have now got to but I see that there have been discussions between SEPA and SSE regarding peat management at the Creag Dhubh substation site, most recently in October last year. The finalised layout should avoid the deepest areas of peat, minimise the footprint of the development and use methods such as piling and floating to avoid peat excavation wherever possible. Clear reuse options will need to be outlined as to how disturbed peat can be reused, and as discussed at that time, use of peat to construct landscaping bunds is not an acceptable use. If a genuine reuse option cannot be found for all the peat then we suggest that an alternative layout or site is required. I cannot locate any previous discussions regarding the Glen Lochy Switching Station, but as you know we no longer have many of our records due to the cyber attack. Generally similar comments would apply but in addition we note the new location moves it slightly nearer to a couple of small watercourses; it should be ensured that the development does not have a direct impact on these water features, and consideration of flood risk may be required.

Any correspondence relating to this case should continue to be sent to planning.sw@sepa.org.uk.

Regards

Susan

Susan Haslam
Senior Planning Officer - Planning Service North
Graesser House, Dingwall Business Park, Dingwall
Email: planning.north@sepa.org.uk

Mobile: 07713 053 767

Please note my working days are Monday to Thursday and Friday morning

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Melrose J (Joyce)

From: Candlish, Alex <alex.candlish@sepa.org.uk>
Sent: 01 February 2022 16:22
To: Econsents Admin
Cc: Young R (Rebecca); Taylor, Jackie
Subject: RE: 220128 - Scoping - consultation email reissued to SEPA seeking response by 4 February 2022 - Creag Dhubh to Dalmally 275 kV Connection - 28 January 2022

OFFICIAL

Dear ECU,

Thank you for consulting SEPA on the above. We understand that the original consultation email was sent to us during the well documented cyber attack on SEPA, however as the scoping opinion has not been issued as of yet SEPA have been now asked to provide formal scoping comments on the proposals.

SEPA has engaged with the applicant, SSEN, on the original route options appraisal as well as discussing matters regarding peat management in relation to the proposed substation that is linked to this proposal. We are content that the applicant is aware of our requirements at this stage moving forward with the proposals, however for completeness, we offer the following comments on the Scoping Report.

It appears that all interests in relation to SEPA's remit have been scoped in, which SEPA welcome at this stage. We note one of our main areas of thought at the route options stage was one of the option to underground a significant length of the connection, however this was not taken forward as the preferred option. In recent discussions with SSEN we have asked to review peat management assessments prior to an EIAR being submitted. I would like to highlight at this stage if the applicant wishes to submit assessments in relation to other areas of SEPA's interest prior to the publication of the EIAR then we would welcome this.

I trust the above sets out clearly our position at this stage. If the ECU or applicant would like a copy of SEPA's standard comments then please refer to <https://www.sepa.org.uk/media/144547/lups-l-14-windfarm-scoping-letter.pdf>

Kind Regards,

Alex

Alex Candlish

Acting Unit Manager – Planning South East

Scottish Environment Protection Agency (SEPA)

e: alex.candlish@sepa.org.uk mob: 07827 978357 w: www.sepa.org.uk

Please note that I do not work on a Friday.

Mcgroarty K (Kirsty)

From: Ruari Dunsmuir <Ruari.Dunsmuir@nature.scot>
Sent: 03 March 2022 17:11
To: Young R (Rebecca)
Cc: Tommy.Hart@sse.com; Jackie.Taylor@sse.com; Khataza S (Shafharia)
Subject: 220223 - Scoping - Request for any further comments regarding consultation document (June 2021) by 4 March 2022 - Creag Dhubh to Dalmally 275 kV Connection - 23 February 2022

Rebecca

Creag Dhubh to Dalmally 275kV Connection Alignment Selection - Connection to Proposed Glen Lochy Switching Station, Creag Dhubh Substation and Project Update. Ref: ECU0002199

Thank you for your email on 23 February 2022 requesting comments from NatureScot regarding the further information provided by the Applicant in June 2021 in regards to Alignment selection.

Section 6.1 of the Consultation Document lists a number of questions for consideration by consultees. I can confirm that the need for project (Q1) and the approach undertaken to select the Preferred Alignment (Q2) have been explained adequately. From our perspective you don't appear to have overlooked any natural heritage interests that could be impacted by the proposal (Q3). I include comments in response to the remaining question (Q4) below.

Deviation GL5 is within 100m of a black grouse lek site. According to data collecting in 2020, two lekking males were observed (Appendix A_R170_3673_Figure5.9_BlackGrouse_20201203_A). As noted in the Consultation Document, 500 m is the minimum distance recommended to avoid disturbance; though this would be a temporary construction phase impact and it is likely that mitigation measures could be agreed, for example by the creation of temporal protective buffers. The construction of access tracks, compounds and other ancillary infrastructure etc. will also need to be carefully considered during this phase in conjunction with the OHL.

However, there is a risk of the lek site being displaced once construction is complete and the OHL operational to its proximity. The potential impact could be mitigated by using Deviation GL1 which will also reduce the amount of peat/ blanket bog impacted by the proposal. Alternatively, a combination of Deviation and Baseline Alignment could be used if possible i.e. T33 – apex of GL1 north of T35 – GL1 to T40 – continue of GL5. Such a potential route, if possible, may have the combined advantages of Deviations GL1 And GL5.

Additionally, should semi-natural broadleaved woodland be required to be felled, there should be an allowance for native compensatory planting.

Kind regards
Ruari

Ruari Dunsmuir | Area Officer (Argyll & Outer Hebrides)

NatureScot | Cameron House, Albany Street, Oban, Argyll PA34 4AE | m: 07909 793 221
NatureScot | Taigh Chamshron, Sràid Albanaidh, An t-Oban, Earra-Ghàidheal PA34 4AE
nature.scot | [@nature_scot](https://twitter.com/nature_scot) | *Scotland's Nature Agency* | *Buidheann Nàdair na h-Alba*

NatureScot is the operating name of Scottish Natural Heritage.

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Thoiribh an aire airson adhbharan gnothaich, 's dòcha gun tèid sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-mach bho NatureScot.

Energy Consents Unit
Scottish Government

By email: econsents_admin@gov.scot

Date: 10th March 2021

Our ref: CEA162052

Your ref: ECU00002168

Dear Mr Hughson,

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR CREAG DHUHB TO DALMALLY 275KV CONNECTION

Thank you for your consultation dated the 9th February 2021 requesting comments on the scope of the Environmental Impact Assessment (EIA) for the proposed Creag Dhubh to Dalmally 275KV connection.

1. Summary

The key issues NatureScot require to be addressed in detail as part of the EIA process include:

- Landscape and visual impacts, including cumulative impacts.
- Ornithological impacts, including impacts on Glen Etive and Glen Fyne Special Protection Area for golden eagle.
- Impacts on nationally important carbon-rich soils, deep peat and priority peatland habitat.

2. Our Advice

2.1 Landscape and Visual.

The proposed LVIA works, as detailed in chapter 12 of the scoping report, will provide adequate assessment of the landscape and visual impacts of this proposal. We note and agree with the proposed View Point selection indicated in table 12.2 .

2.2 Ecology

The proposed scope of methodologies and surveys of the key ecological receptors identified in Chapter 5, should adequately assess the overall ecological impacts.

2.3 Ornithology

The route of the power line runs adjacent to a short length of the boundary of Glen Etive and Glen Fyne Special Protection Area (SPA) for golden eagles at Achlian Farm (please see: <https://sitelink.nature.scot/site/10113> for further details on this designated site). As such the Habitat Regulations will need to be considered before any application can be determined (please see: <https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal-hra> for details).

Whilst the ongoing use of the line, once constructed, will not have any impact on the SPA, there is some scope for impact during construction from disturbance. It is not possible to determine the full magnitude of this impact at this time, however, a commitment in a construction method statement, to avoid any part of the SPA for accessing the works site, including overflying by helicopters, is likely to be sufficient for NatureScot to conclude, and so advise, that there will be no likely significant effect in relation to the Habitat Regulations, when responding to a future consultation on the formal application for this development.

When assessing the ornithological impacts it is important that the following guidance is used <https://www.nature.scot/guidance-assessment-and-mitigation-impacts-power-lines-and-guyed-meteorological-masts-birds>.

2.4 Peat and Priority Peatland Habitat.

The proposal includes areas of class 2, 3 and 5 peatland (Scot Gov 2016 peatland map). As such, there may be priority peatland habitat present which will need to be identified and best practice taken into account when micro-sighting or identifying mitigation for this proposal.

The NVC for the “proposed OHL alignment 2020” section (fig 1.1) from T33 to the east appears to be missing. This will need to be completed and submitted as part of the EIAR submitted with the application.

The following guidance should be followed for surveying the peatland resource: <https://www.gov.scot/publications/peatland-survey-guidance>. For information, the following guidance may help with identifying best practice for priority habitat: <https://www.nature.scot/advising-carbon-rich-soils-deep-peat-and-priority-peatland-habitat-development-management>.

It was noted that the Phase 1 habitats map (figure 5.2) shows an extensive area of E1.7 “Wet Modified bog”, which includes a small rectangular of E1.6.1 “Blanket Sphagnum bog”. There is no obvious difference in bog condition between these areas so this may be a mapping error.

NatureScot have been pleased to be able to engage fully with the developer before the scoping document was drawn up. Please do not hesitate to contact me if we can be of further assistance before the final application is submitted.

Yours sincerely,

[by email]

Stephen Austin
Operations Officer
Lorn and North Argyll
NatureScot

Stephen.austin@naturr.scot

From: [Urszula Szupczynska](#)
To: [Young R \(Rebecca\)](#); [Econsents Admin](#)
Subject: RE to SEA - 220223 - Scoping - Request for any further comments regarding consultation document (June 2021) by 4 March 2022 - Creag Dhubh to Dalmally 275 kV Connection - 23 February 2022
Date: 28 February 2022 06:01:02
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[20210813 HES response.pdf](#)

Dear Rebecca,

HES provided comments on this additional information directly to SSE in August 2021. Please find attached our previous response, which will be relevant to the current consultation.

Please let me know if you have any questions regarding this response.

Kind regards

Urszula

**Urszula Szupczynska | Senior Environmental Assessment and Advice Officer |
Environmental Assessment and Advice Team | Heritage Directorate**

*We inform and enable good decision-making so that the historic environment of
Scotland is valued and protected.*

Involved in decisions affecting the historic environment? See the Historic Environment Policy
for Scotland at www.historicenvironment.scot/heps

Historic Environment Scotland | Àrainneachd Eachdraidheil Alba

Longmore House, Salisbury Place, Edinburgh EH9 1SH

T: 0131 668 8983

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By email to: jackie.taylor@sse.com

Jackie Taylor
Consents & Environment Manager
SSEN Transmission

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300026976

13 August 2021

Dear Jackie Taylor

[The Electricity Works \(Environmental Impact Regulations\) \(Scotland\) 2017](#)
[Creag Dhubh Substation to Dalmally Substation - Proposed 275kV Overhead Line](#)
Pre-application consultation

Thank you for your email of 18 June 2021, which invited our pre-application comments on the consultation document for the above project. This letter contains our comments for our historic environment interests. Our remit is World Heritage Sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories. Please also seek information and advice from Argyll & Bute Council's archaeology and conservation services for matters including unscheduled archaeology and category B and C-listed buildings

We have previously provided comments on the proposed route options for the overall project and for preferred alignments for the southern end of the route. The current consultation document covers the northern-most sections of the proposed overhead line (OHL) and the proposed substations. We understand that you are inviting comments on the Preferred Alignment identified within the northern section of the project between Tower 28 and the Glen Lochy substation.

We have provided specific comments on potential impacts of the section of the scheme between Tower 28 and the Glen Lochy substation on historic environment assets within our remit in the attached annex. Further information is required to fully understand the potential effects on the setting of some of the assets within our remit.

We recommend that our Managing Change in the Historic Environment guidance note on [setting](#) should be used when considering setting impacts as the project progresses. Further good practice advice on the assessment of impacts on cultural heritage can also be found in [Appendix 1 of the EIA Handbook](#).

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Victoria Clements who can be contacted by phone on 0131 668 8730 or by email on Victoria.Clements@hes.scot.

Yours sincerely

Historic Environment Scotland

Annex

Historic Environment Scotland (HES) has previously provided comments on the route options and alignments for the overall project in April 2018, alternative connection options in September 2020 and scoping advice in April 2021. We welcome that we continue to be involved in the consultation process for this project.

During the previous consultation we raised concerns about the potential for significant impacts on the settings of three scheduled monuments in the northern section of the OHL, Tom a'Chaisteal, dun, Teatle Water (SM 4209), Dychlie, deserted crofts (SM 5149) and Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019).

We have reviewed the consultation document and supporting information provided. Our comments on the potential impacts on relevant scheduled monuments from the Preferred Alignment and alternative alignments are set out below.

Alignment GL1

This option would move the route closer to Tom a'Chaisteal, dun, Teatle Water (SM 4209) (to within 114m) and further from Dychlie, deserted crofts (SM 5149) when compared to the baseline. Whilst this may be beneficial for the setting of Dychlie, it would have the opposite effect for the setting of Tom a'Chaisteal, which has a more sensitive setting.

The information provided in support of this option gives no indication as to the precise location of T29 if this were to be taken forwards. T29 would be directly downslope from Dychlie and upslope from Tom a'Chaisteal and therefore is the component of this alignment option that would be most likely to be visually prominent in these monuments' settings. If T29 were to be located on the eastern bank of the Teatle Water, for instance, then the overhead line strung between the two lattice towers would lie between the monuments (downslope of Dychlie and upslope from Tom a'Chaisteal), and the overhead line would present less of an impact on setting than a lattice tower would. Further information is therefore required in order to clarify the potential impacts and inform any resulting necessary mitigation. We would be happy to discuss this further.

In the vicinity of Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019), this option would present a minor improvement when compared to the baseline in terms of impact on the setting of the monument, as the line would be pushed slightly downslope into existing forestry, but the scale of this change is negligible.

Alignment GL2

As with option GL1, this option moves the route closer to Tom a'Chaisteal, dun, Teatle Water (SM 4209) (to within 95m) and further from Dychlie, deserted crofts (SM 5149) when compared to the baseline. Whilst this may be beneficial for the setting of Dychlie, it

has the opposite effect for the more sensitive setting of Tom a'Chaisteal. The position of T29 is likewise not precisely indicated, and it is the position of this tower that would probably alter the level of impact compared to the baseline. Further information is therefore required in order to clarify the potential impacts and inform any resulting necessary mitigation. We would be happy to discuss this further.

This option proposes no change from the baseline in the vicinity of Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019).

Alignment GL3

This option adopts a similar alignment between T28 and T31 to option GL1 and similarly moves the route closer to Tom a'Chaisteal, dun, Teatle Water (SM 4209) (to within 98m) and further from Dychlie, deserted crofts (SM 5149) when compared to the baseline. Whilst this may be beneficial for the setting of Dychlie it is likely to have a more significant adverse impact on the more sensitive setting of Tom a'Chaisteal. The position of T29 is likewise not precisely indicated, and it is the position of this tower that would probably alter the level of impact compared to the baseline. This option proposes no change from the baseline in the vicinity of Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019).

More information is required in order to more fully understand the potential impacts and inform any resulting necessary mitigation.

Alignment GL4

This option involves a straight-line route between T31 and T36 which avoids an angle in the baseline route. This section of route would have no significant impact on the setting of any of the scheduled monuments.

Alignment GL5

This option covers the northern end of the line between T40 and the Glen Lochy substation and would entail routing the line parallel to but uphill of the baseline. This brings the route closer to Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019) and consequently could result in a greater impact on the setting of the monument than the baseline. There is the potential for an increased impact on the setting of the monument especially in terms of how the sense of abandonment is understood and appreciated and in how the monument relates to the land that once supported its occupation due to the increased proximity of the proposed line.

Cultural Heritage appears not to have been appropriately assessed in the consultation document summary table 3.1 for this option. We note that the assessment in Annex F, Table C8 states that there is no change from the baseline alignment despite the closer proximity to the scheduled monument. We therefore do not have confidence that this impact has been properly carried through into the RAG assessment.

Further information is required in order to more fully understand the potential impacts and inform any resulting necessary mitigation.

Substations

We have no concerns over the minor changes proposed to the design of the substations.

Summary

Our preferred option is the baseline option as it presents the least impact on the setting of Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019), Tom a'Chaisteal, dun, Teatle Water (SM 4209) and Dychlie, deserted crofts (SM 5149).

Whilst alignments GL1 to GL4 all lessen the impact on the setting of Dychlie, deserted crofts (SM 5149) compared to the baseline, by locating the route further from the monument and by utilising topography to set the line marginally lower in the landscape, these alignments would be closer to and uphill of, and therefore have an adverse increased impact on the more sensitive setting of Tom a'Chaisteal, dun, Teatle Water (SM 4209).

Alignment GL5 would increase the impact on the setting of Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019) as it brings the line closer to the monument and locates it at a greater altitude, thus increasing its prominence in outward views.

We are concerned that these impacts do not appear to have been thoroughly considered in the assessment process so far and sufficient information has not been supplied regarding the closest new element of the proposals, T29, which is likely to be a significant cause of any impacts. This information is required in order to better understand the potential impacts and inform any resulting mitigation, such as line avoidance and relocation of towers.

We would be happy to provide more detailed comments if further information can be supplied to assist with the assessment of impacts. We recommend that visualisations showing the impacts of the Preferred Alignment and alternative options from the 3 scheduled monuments would be helpful. If it would be helpful for us to engage with your cultural heritage advisors regarding these impacts and the assessments we would be happy to do so.

We hope that you find these comments useful. Please do not hesitate to get in touch if you have any questions about any of the information provided. We look forward to working with you further on the project as it progresses.

Historic Environment Scotland

13 August 2021

By email to: econsents_admin@gov.scot

Magnus Hughson
Energy Consents Unit
4th Floor, 5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300026976
Your ref: ECU00002199

08 April 2021

Dear Magnus Hughson

[The Electricity Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017
Creag Dhubh Substation to Dalmally Substation, Argyll and Bute - Proposed 275kV
Overhead Line
Scoping Report](#)

Thank you for your consultation which we received on 09 February 2021 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings. In this case, you should contact the West of Scotland Archaeology Service (WoSAS).

Proposed Development

We understand that the proposed development comprises a new 275kV overhead line (OHL) running between a new substation at Creag Dhubh and a new switching station at Glen Lochy, near Dalmally in Argyll and Bute. The OHL will run for 13.8km between the new substation at the south end and the new switching station at the north end. The OHL will be supported on steel lattice towers with an average height of 50m and average span between towers of 280m but some towers may be up to 60m in height and spans of 350m maximum. We understand that in order to allow for micro-siting after consent a limit of deviation (LOD) of 100m from the proposed tower locations will be included in the application.

We understand that the development is currently at two stages – the line from Creag Dhubh to Tower 33 (T33) is at preferred alignment stage, from T33 onwards it is at

preferred route stage following recent consultation on alternative options for this section (the preferred alignment is still in development).

Scope of assessment

Direct impacts

There is a single scheduled monument within the proposed route which has the potential to receive direct impacts from the proposed development. We have provided further information regarding this asset, potential impacts and mitigation in the attached annex.

Impacts on the setting of assets

There are a number of nationally important historic environment assets within our remit in the vicinity of the development whose settings have the potential to be significantly adversely impacted by it. The annex to this letter gives details of a number of assets which appear likely to experience impacts. This list should not be treated as exhaustive and is only intended as a reference to those assets which at this stage appear most likely to be significantly impacted.

Scoping report

We welcome that potential effects on cultural heritage are scoped into the assessment and we have provided further comments in the attached annex. Further information on good practice in cultural heritage assessment can be found in [Appendix 1 of the EIA Handbook](#)

Further information

The Historic Environment Policy for Scotland (HEPS 2019) was adopted on the 01 May 2019 and replaced the Historic Environment Scotland Policy Statement (HESPS 2016). The Historic Environment Policy for Scotland is a strategic policy document for the whole of the historic environment and is underpinned by detailed policy and guidance. This includes our Managing Change in the Historic Environment Guidance Notes. All of these documents are available online at www.historicenvironment.scot/heps.

Practical guidance and information about the EIA process can also be found in the [EIA Handbook \(2018\)](#). Technical advice is available on our Technical Conservation website at <http://conservation.historic-scotland.gov.uk/>.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Victoria Clements and they can be contacted by phone on 0131 668 8730 or by email on Victoria.Clements@hes.scot.

Yours faithfully

Historic Environment Scotland

Annex

Historic Environment Scotland's interest

There is the potential for both direct impacts and impacts on the setting of nationally important designated assets in the vicinity of the proposed development.

The following designated historic environment assets are in the vicinity of the development and have the potential to be impacted by it. This list is not considered to be exhaustive, and we would recommend that a wider search is undertaken of the surrounding area for potential impacts in the first instance. Any direct impacts should be mitigated by avoidance and impacts to the settings of assets should be assessed appropriately to determine whether these will be significant.

We recommend that an appropriately detailed ZTV should be used to identify potential setting impacts in the first instance. We welcome that the scoping report indicates that a ZTV will be used, however, consideration should be given to including assets where even though the ZTV indicates that no direct intervisibility would be possible there is the potential for the OHL to appear in the background of key views towards these assets.

Direct impacts

Scheduled monuments

- Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019)

This scheduled monument is located within the area of the preferred route at the north end of the OHL. This site comprises a post-medieval township with the remains of a dozen buildings of various sizes, associated enclosures and at least one kiln. The surrounding landscape outwith the scheduled area shows clear evidence of agricultural use by the township with the remains of rig and furrow cultivation visible spreading out in all directions in the wider landscape.

The township would have had a functional relationship with the surrounding landscape which it was positioned to exploit as demonstrated by the cultivation remains. The ruined buildings in the township also have a strong character that includes a sense of abandonment of the settlement. The township is now within open ground with forestry located in the distance to the north west, north and north east. Although deer fencing has been erected in close proximity to some elements of the township, there is a lack of large scale modern development in the current setting of the monument which contributes to its character and the sense of abandonment at the site.

While we consider it possible that an alignment for the OHL could be accommodated within this route without raising issues of national interest, this will be very much dependent on the detailed design of any alignment proposed. Any detailed route alignments should ensure that direct impacts on designated historic environment assets are avoided, in line with national policy. This includes both the pylon structures themselves and any ancillary development such as access tracks.

Impacts on setting of assets

Scheduled monuments

- Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019)

For the north section of the route from T33 to the proposed new switching station at Glen Lochy, we consider that it may be possible to accommodate a carefully designed alignment which follows the edge of the forestry to the north west and north of Auchtermally or Uachdar Mhaluidh, Deserted Township (SM 4019) within this preferred route. However, we would need to see the proposed alignment and visualisations demonstrating the effects on the setting of this scheduled monument before we could be confident that significant effects can be avoided.

We welcome that the scoping report identifies that the potential impacts on the setting of this monument are a key consideration and that visualisations will be required. We consider that photomontages are likely to be required to demonstrate the impacts on the setting of this asset. We strongly recommend further consultation with us at the earliest stages of considering alignment options to ensure that appropriate mitigation by design is built into this section of the OHL.

- Tom a'Chaisteal, dun, Teatle Water (SM 4209)
- Dychlie, deserted crofts (SM 5149)

The preferred alignment for the OHL between Creag Dhubh and T33 as shown in the Scoping Report, runs between Tom a'Chaisteal, dun, Teatle Water (SM 4209) and Dychlie, deserted crofts (SM 5149). The proposed line is around 200m or thereabouts from both monuments. Given the proximity of the proposed OHL there is the potential for adverse impacts on the setting of both scheduled monuments.

Tom a'Chaisteal dun is a small fortified site likely to date to the later prehistoric or early medieval periods. It has been positioned on a small knoll overlooking the Teatle Water for defensive and strategic reasons, in particular, to provide open views of the approaches, perhaps most importantly down towards Loch Awe, along the valley of the

Teatle Water to the west. The site of the dun would have been carefully chosen by the fort's builders because of these qualities.

The dun is currently in commercial woodland and so views out of it are constrained. However, this will be subject to change in the future and more extensive views will become available. These views would allow an appreciation of the strategic location of the dun and contribute to an appreciation of its significance. We note, however, that the proposed alignment would not cross between the monument and Loch Awe, which we consider is likely to be the most strategically important direction of view from this monument. In this instance it is possible that the towers of the OHL would be sufficiently distant that a sense of the dun's prominence will be preserved.

Dychlie, deserted crofts (SM5149) comprises a group of three rectangular stone buildings which formed a small post-medieval township.

The township would have had a clear functional relationship to the surrounding uplands, which they were positioned to exploit. The ruined buildings in the township also have a strong character that includes a sense of abandonment of the settlement. The township is now within open ground within commercial forestry and views to the surrounding land allow an appreciation of the town's exploitation of that land. The lack of modern development in the surroundings contributes to the character of the monument and in particular its sense of abandonment.

We consider that the proposed line would likely have an adverse impact on the setting of the monument because it would change the character of the settlement's surroundings. It would erode to some degree the sense of abandonment at the settlement.

For both of these scheduled monuments we consider it likely that any impacts on their settings from the preferred alignment would be unlikely to raise issues of national interest. However, given the proximity of the OHL to these assets we welcome that the scoping report identifies potential impacts on the setting of these two assets as key considerations and that visualisations will be required to demonstrate the impacts. We recommend that photomontages are produced demonstrating the impacts on these monuments.

- Kilchurn Castle, Dalmally (SM 90179 & PiC)
- Fraoch Eilean, castle (SM 2219)

We welcome that an assessment of the potential impacts of the proposed development on the setting of these assets will be undertaken and that visualisations will be produced to demonstrate the impacts. We would be happy to review wirelines in the first instance and confirm whether full photomontages should be produced for these assets.

For all of the above assets, the visualisations should be used to assess the scale of adverse impacts that are likely at these monuments and whether any mitigation, for example through micro-siting of towers would be likely to reduce the impacts. The assessment will also need to consider if micro-siting within the proposed limit of deviation might increase impacts on assets. In particular, it may be that any movement of the proposed line closer to either Dychlie deserted crofts (SM5149) or Tom a'Chaisteal, dun (SM4209), where the line passes between them, would increase impacts on one or the other monument. It may also be relevant to consider precisely where the towers could be located to minimise impacts on these two monuments.

We would welcome consultation with us, when these visualisations have been produced, prior to submission of any application, to discuss what mitigation may or may not be desirable with regard to historic environment interests.

Category A listed buildings

- Glenorchy Kirk Clachan An Disert (LB 12192)

We welcome that the potential impacts of the proposed development on the setting of this category A listed building will be assessed. We are content that the proposed viewpoint from the associated scheduled monument will likely be sufficient to demonstrate the impacts on the setting of the category A listed building.

- St Conan's Church of Scotland, Lochawe (LB 4700)

We recommend that the potential impacts of the proposed development on the setting of this category A listed building are assessed. The garden and terracing around St Conan's are clearly intended to take advantage of the scenic location. We recommend that a visualisation from the area to the south east of the church is provided to demonstrate the potential impacts on its setting.

Inventory gardens and designed landscapes

- Ardanaiseig House (GDL 00018)

We recommend that the potential impacts of the proposed development on the Inventory garden and designed landscape should be assessed. There are important views from the garden and designed landscape along and across Lochawe, and a historic relationship with Inishail (and the scheduled monument located there), which would likely be affected by the proposed development.

We consider it likely that the proposed visualisations from the category B listed Ardanaiseig House and from Inishail will also demonstrate the potential impacts on the garden and designed landscape. However, we are happy to provide further advice on visualisations if that would be helpful.

Scoping report

We welcome that potential impacts on the historic environment has been scoped in to the assessment. We welcome that direct impacts, impacts on the setting of assets and cumulative impacts will all be assessed, and that mitigation measures will be identified for any significant effects.

We are content in this instance with the proposed 5km study area for identifying assets which may receive impacts to their settings from the proposals. We welcome that the assessment would include site visits to assets with potential visibility of the proposed OHL.

We welcome that a ZTV has been used in the first instance to identify assets with the potential to receive impacts to their settings and which require visualisations. We are happy to provide further advice regarding the type of visualisations required as suggested in the report if that would be helpful.

We note that section 11.4 on potentially significant effects refers to the potential for direct effects on non-designated assets within the LOD but does not refer to direct effects on designated assets. As identified above, there is currently the potential for direct effects on a scheduled monument located within the preferred route corridor at the north section of the OHL.

We welcome that our Managing Change guidance note on setting and the EIA Handbook will be used in the assessment of impacts on historic environment assets. We would be happy to provide advice on a more detailed methodology, as suggested in the report, if that would be useful. We welcome that mitigation measures for significant effects will be set out.

We are content in this instance that potential impacts on World Heritage Sites, Inventory battlefields and Conservation Areas can be scoped out of the assessment.

Historic Environment Scotland
08 April 2021

Magnus Hughson

The Scottish Government
Energy Consents Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

3rd March 2021

Mr Hughson,

**ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)
(SCOTLAND) REGULATIONS 2017
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37
APPLICATION FOR CREAGH DHUHB TO DALMALLY 275KV CONNECTION**

Argyll District Salmon Fishery Board have a remit to protect and improve fisheries for migratory salmonid fish, including both Atlantic salmon and Sea trout, both of which are a priority species for conservation and management due to their importance to the local biodiversity and economy.

We would like to draw attention to the important salmon and trout spawning and nursery habitats in the Teatle Water, Allt Fearn and the Claddich River which the proposed new line will potentially cross. We ask that the developer to demonstrate that stream crossings, the development of the road network and construction of pylon foundation are undertaken in a sensitive manner that maintain the quality and accessibility of the habitat to fish.

Yours sincerely

Robert Younger

Clerk to the Argyll District Salmon Fishery Board

Melrose J (Joyce)

From: laura.k.taylor@bt.com on behalf of radionetworkprotection@bt.com
Sent: 02 March 2021 11:35
To: Econsents Admin
Cc: radionetworkprotection@bt.com
Subject: FW: Scoping - Creag Dhubh to Dalmally 275 kV Connection - WID11445
Attachments: image003.emz

**OUR REF; WID11445**

Dear Sir/Madam

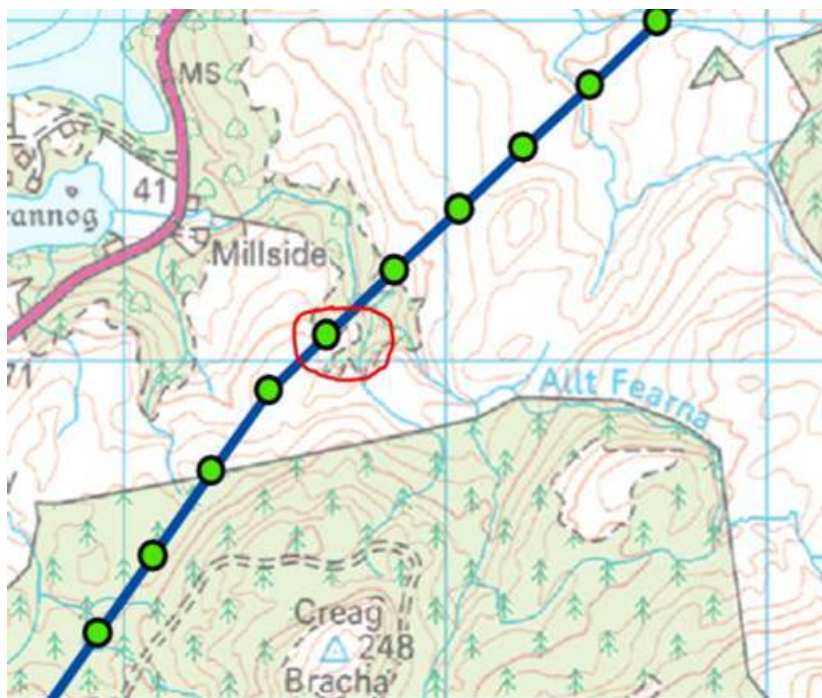
Thank you for your email dated 09/02/2021.

We have studied the Locations of the Tower Structures for Creag Dhubh to Dalmally 275 kV Connection proposal with respect to EMC and related problems to BT point-to-point microwave radio links.

We have assumed a maximum Tower Height of 60m as indicated in section '2.4 Indicative Overhead Line Design' of the scoping report. Tower Number 18 runs directly under BT Radio Link 6140 from DALMALLY POLICE SITE to KILCHRENAN TE. If these Tower heights increase above 60m you will need to resubmit your proposal and BT will reassess the impact accordingly.

With the Tower Height at 60m the conclusion is that, the Project indicated should not cause interference to BT's current and presently planned radio network.

Images for info.



BT Radio
Link 614



Please direct all queries to radionetworkprotection@bt.com

Kind regards

Laura Taylor

Engineering Services - Radio Planning

Email: radionetworkprotection@bt.com

BT's Values: Personal. Simple. Brilliant.

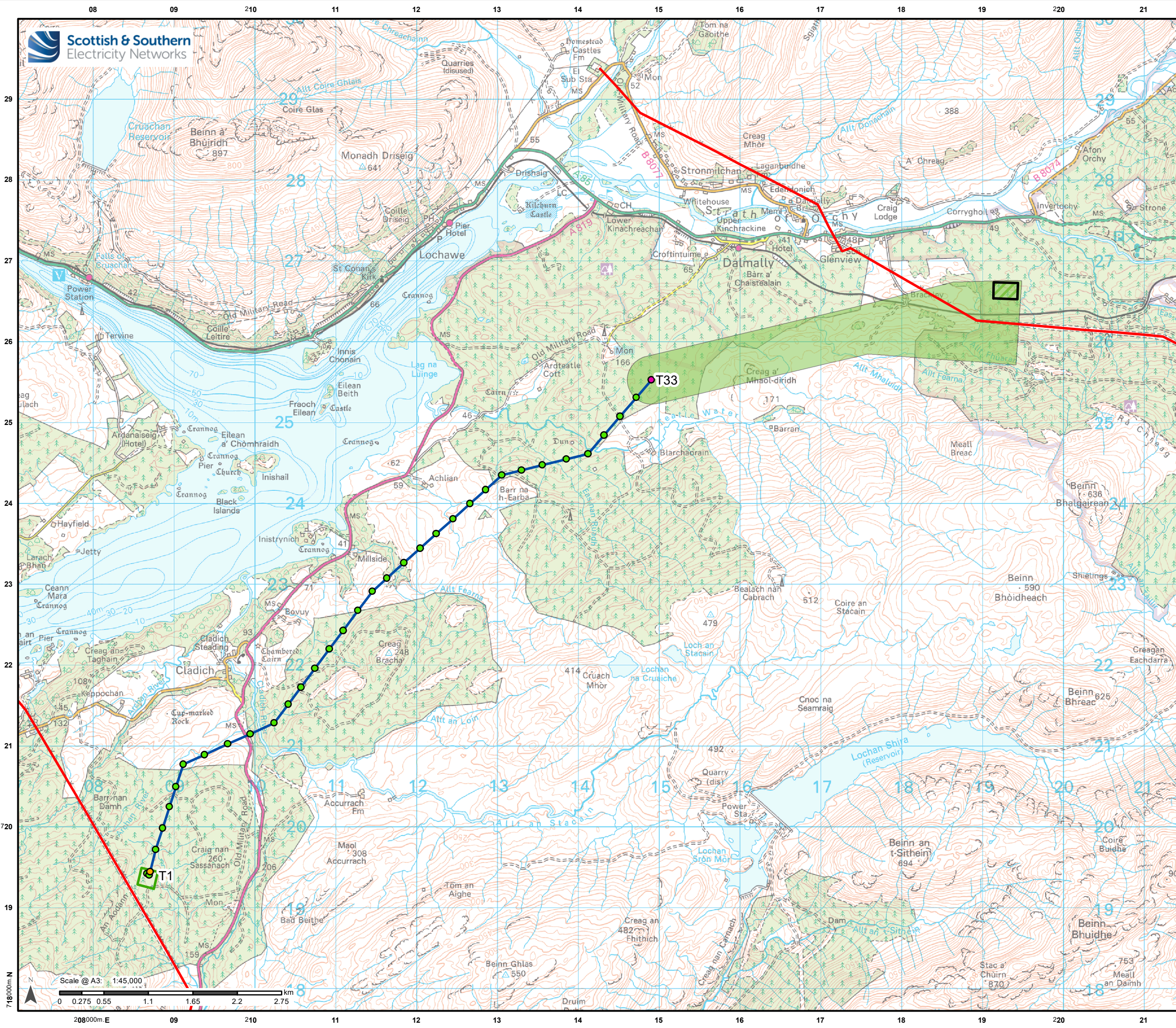


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British Telecommunications plc

R/O : 81 Newgate Street, London EC1A 7AJ



Legend

Proposed Development

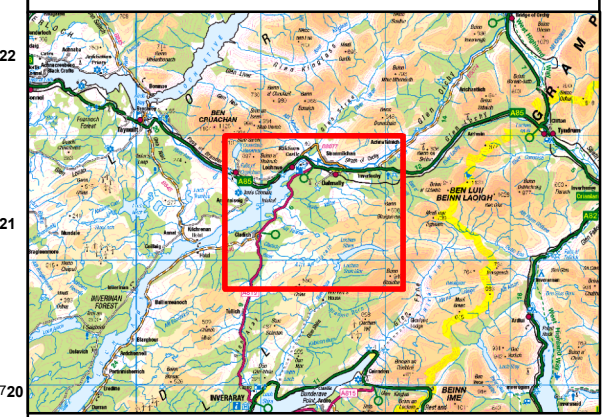
- Proposed Tower Locations
- Tower 1
- Tower 33
- Proposed OHL Alignment, 2020 Consultation

Associated Infrastructure

- Proposed Creag Dhubh Substation
- Proposed Switching Station, 2020 Consultation

Existing Infrastructure

- Existing 275kV Overhead Line (Scottish Power)



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| |
|--|
| Project No: 1700003673 |
| Project Name: Creag Dhubh (North Argyll) Substation to Dalmally |
| Figure Title: Figure 1.1: Proposed Development - Location Plan |
| Drawn by: BM Date: 20/11/2020 |
| Drawing: R170_3673_Fig1.1_ProposedDevelopmentLocationPlan_A |

Brown C (Carolanne)

From: Melrose J (Joyce)
Sent: 17 February 2021 13:48
To: Econsents Admin
Subject: FW: 20210212-Reply Scoping - Creag Dhubh to Dalmally 275 kV Connection

From: DES ADEWS-RSP Safeguarding (MULTIUSER) <DESADEWS-RSPSafeguarding@mod.gov.uk>
Sent: 12 February 2021 12:25
To: Hughson M (Magnus) <Magnus.Hughson@gov.scot>
Subject: 20210212-Reply Scoping - Creag Dhubh to Dalmally 275 kV Connection

Good Afternoon,

The assessor has no concerns with this application.

Regards

Moira

Moira Wilson
RSP Safeguarding
e-mail [DESADEWS-RSPSafeguarding\(MULTIUSER\)@mod.gov.uk](mailto:DESADEWS-RSPSafeguarding(MULTIUSER)@mod.gov.uk)
RAF Henlow Tel. 03001514817

Mcgroarty K (Kirsty)

From: DES ADEWS-RSP Assessors (MULTIUSER) Redacted
Sent: 24 February 2022 10:08
To: Thomas, Kerry Mrs (DES ADEWS-PCM Spt); Wilson, Moira Mrs (DES ADEWS-RSP Spt)
Subject: RE: 20220223-ECU00002199-Creag Dhubh to Dalmally 275 kV Connection

No concerns.

Andy Pritchard (RSP Eng2)

From: Thomas, Kerry Mrs (DES ADEWS-PCM Spt) Redacted
Sent: 23 February 2022 10:47
To: DES ADEWS-RSP Assessors (MULTIUSER) Redacted
Subject: 20220223-ECU00002199-Creag Dhubh to Dalmally 275 kV Connection

Hi

Please see email below for a power line application.

Regards

Kerry Thomas | ADEWS DT | Project Controls Management Spt
RAF Henlow | Room C26 | Building 85 | Hitchin | SG16 6DN
CIV: Redacted ext. 4243 | MIL: 95381 ext. 4243



Defence Equipment & Support

Recipients should note that email traffic on MOD systems is subject to monitoring, recording and auditing to ensure the effective operation of the system and for other lawful purposes.

From: Rebecca.Young@gov.scot <Rebecca.Young@gov.scot>
Sent: 23 February 2022 08:57
Cc: Tommy.Hart@sse.com; Jackie.Taylor@sse.com; Shafharia.Khataza@gov.scot
Subject: 220223 - Scoping - Request for any further comments regarding consultation document (June 2021) by 4 March 2022 - Creag Dhubh to Dalmally 275 kV Connection - 23 February 2022

I refer to the below consultation email issued on 9 February 2021 in regards to the request for a scoping opinion from the Scottish Ministers for the proposed section 37 application for Creag Dhubh to Dalmally 275 kV Connection.

Further information was provided by the Applicant in June 2021 in regards to Alignment selection – Connection to Proposed Glen Lochy Switching Station, Creag Dhubh Substation and project update.

This Information can be viewed at the Scottish Government's Energy Consents Unit website www.energyconsents.scot by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing **Creag Dhubh to Dalmally** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00002199** and then click on **Documents** tab.

I would be grateful for any further comments consultees may wish to feed into the scoping opinion in regards to this information by **Friday 4th March 2022**.

Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send any responses (in PDF format if possible) to Econsents_Admin@gov.scot.

Kind regards

Rebecca

Rebecca Young | Team Leader | Energy Consents Unit
The Scottish Government Redacted

From: Hughson M (Magnus)

Sent: 09 February 2021 16:35

Subject: Scoping - Creag Dhubh to Dalmally 275 kV Connection

Dear consultees,

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR CREAGH DHUHB TO DALMALLY 275KV CONNECTION

On 16 December 2020, Scottish Hydro Electric Transmission Plc submitted a request for a scoping opinion from the Scottish Ministers for the proposed section 37 application for Creag Dhubh to Dalmally 275 kV Connection. The proposed development is located in the planning authority area of Argyll and Bute Council in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report can be viewed at the Scottish Government's Energy Consents Unit website www.energyconsents.scot by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing **Creag Dhubh to Dalmally** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00002199** and then click on **Documents** tab.

To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site specific information.

I would be grateful for your comments by **Wednesday 3 March**. Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to Econsents_Admin@gov.scot.

Regards,

Magnus Hughson

The Scottish Government
Energy Consents Unit
5 Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU.

Redacted

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Melrose J (Joyce)

From: Steve Thomson <sthomson@glasgowprestwick.com>
Sent: 03 March 2021 11:44
To: Hughson M (Magnus); Econsents Admin
Cc: Safeguarding; Windfarm
Subject: Scoping - Creag Dhubh to Dalmally 275 kV Connection - formal response from Glasgow Prestwick Airport Ltd - 3rd March 2021

Magnus,

This proposed development lies outwith the safeguarding area of Glasgow Prestwick Airport (GPA) – and consequently should this development come to a full planning application GPA will have no aviation objection to the development.

Kind Regards

Steve Thomson

Melrose J (Joyce)

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 10 February 2021 10:29
To: Hughson M (Magnus); Econsents Admin
Subject: RE: Scoping - Creag Dhubh to Dalmally 275 kV Connection [SG31021]

Our Ref: SG31021

Dear Magnus

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully



NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



Magnus Hughson
Energy Consents Unit
The Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

05 March 2021

Dear Magnus,

Scoping opinion for proposed Creag Dhubh to Dalmally 275 kV Connection under regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Thank you for consulting RSPB Scotland regarding this scoping opinion for a 13.8 kilometre (km) double circuit 275 kV overhead line (OHL), supported by lattice steel towers between a proposed substation at Creag Dhubh to a new switching station in Glen Loch. The proposal will also include access tracks, temporary construction compounds, woodland removal. The construction of the substation and switching station will come under separate applications with their own EIAs. A draft scoping report was enclosed with this consultation and will be referenced as required in this response. The proposal's footprint falls in areas of commercial forestry and open ground habitat.

RSPB Scotland advises that an Environmental Impact Assessment Report (EIAR) for this proposal should establish the potential impacts of the development on important bird populations within the area, with emphasis given to assessing potential impacts upon raptors, particularly golden eagle.

Designated sites

The site is within close proximity and, for distance of 1km, directly borders the Glen Etive and Glen Fyne SPA designated for supporting a population of Annex 1 species (list of the EC Birds Directive) golden eagle *Aquila chrysaetos*. Although this proposal is not directly situated within the SPA, there is potential for it to impact on a golden eagle territory which is part of the wider golden eagle population in this area and any indirect impacts should be considered in the EIAR. We agree with the proposed approach for the Habitat Regulations Assessment outlined in the scoping report.

Bird Species of Conservation Concern

The following Annex 1 bird species have been highlighted in the scoping EIA report as occurring within or close to the proposal: golden eagle, white-tailed eagle, hen harrier, peregrine and merlin. Other Birds of Conservation Concern and important Local Biodiversity Action Plan (LBAP) species include black grouse. The potential impacts on all of these species should be adequately covered within the EIAR.

It should be remembered that all nesting birds are protected by law and therefore we would advise that if any vegetation removal is required along the route that this should occur outwith the breeding season (March- August inclusive) or that these areas are checked prior to work starting to ensure no nesting birds are present.

Survey requirements

From the information provided in the scoping report we agree with the species identified to be included in the EIAR. The EIA should establish how these species are using the site area through the vantage point observation surveys, plotting of flightlines and related information to determine any potential impacts.

An assessment of the forestry and open ground habitat suitability for raptors, black grouse and breeding waders should be undertaken and should consider present usage in comparison to the potential alteration of habitat and displacement effects which may occur during and due to the development.

Golden and white-tailed eagle

As mentioned previously and within the scoping report, the proposal lies in close proximity to the Glen Etive and Glen Fyne SPA designated for its golden eagle population. Although the proposal footprint does not fall within the SPA there is potential for it to impact up on it and we advise that a Habitat Regulations Assessment is undertaken as is suggested with the scoping report. We also have records showing a golden eagle territory close to the proposal, we would advise consulting Argyll Raptor Study Group as they will be able to provide the most up to date information relating to this territory (NA21) and other raptor species activity within this area.

White-tailed eagles are increasingly being reported from around this area, via both visual sightings and satellite tag information and it is noted from the scoping report that a white-tailed eagle nest was observed within 500m of the proposal. We advise that since birds occupy this area, ongoing assessment and mitigation are required. Survey work should therefore occur throughout the planning and installation period.

Black grouse

In Argyll terms, the wider spread of birds within this area is important and any proposal should fully assess impacts on this species, including noise, and should avoid siting towers close to any lek sites. Consideration should also be given to mitigation works for the species within the site and surrounding area.

Habitats & habitat management/mitigation

The EIAR should include a full survey, impact assessment and proposals for mitigation in relation to important habitats on this site. Mitigation should ideally minimise any impact and avoid areas of high-quality habitats found upon the site.

Particular attention should be given to peatland. Figure 7.1 highlights that the majority of the site falls into Class 5 and is located within commercial forestry. There are however a few towers that are proposed to be built on Class 2 peatland. The majority of the 'preferred route option 3' also falls on Class 2 peatland. We would recommend that when the plans for this develop further that this section should be constructed in the footprint of commercial forestry to safeguard the peatland and open habitat in this area. A full assessment of the carbon implications of this proposal should be undertaken. A mitigation plan for any peatland affected by the proposal should also be put forward.

The proposals footprint also cuts across several areas highlighted under the Ancient Woodland Inventory, any loss of this habitat should be minimised and if unavoidable compensatory planting should be undertaken with advice taken from NatureScot.

The EIAR should consider what mitigation measures are required to minimise the impact on important species and contain detailed ecological justification for any such proposals. Ideally, this should include relevant time frames for mitigation in relation to site development.

Cumulative impacts

An assessment of cumulative bird impacts in relation to other existing, consented and proposed projects (predominantly forestry and wind farms), within this natural heritage zone (NHZ) should be undertaken.

We hope you find these comments helpful. Should you require clarification of any of the above points please do not hesitate to contact me.

Yours sincerely,

Redacted

Alasdair Lemon
Conservation Officer



Magnus Hughson
Energy Consents Unit
Scottish Government

Our Issue ref: 03657

3/03/2021

Dear Mr Hughson,

**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)
(SCOTLAND) REGULATIONS 2017
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION
FOR CREAGH DHUHB TO DALMALLY 275KV CONNECTION**

Thank you for your scoping request of 9 February 2021, as being kept informed about such developments is very welcome.

At present, we do not have capacity to respond to scoping requests regarding Overhead Lines as a matter of course. That said, the applicant is welcome to approach us directly for a formal consultation response if they consider that information about public rights of way and other recreational routes could assist in the preparation of their application.

I hope the information provided is useful to you. Please do not hesitate to contact us if you have any further queries.

Yours sincerely,

Redacted

Lynda Grant
Access Officer

Wednesday, 17 February 2021



Local Planner
Energy Consents Unit
5 Atlantic Quay
Glasgow
G2 8LU

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Steps
Glasgow
G33 6FB

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk

Dear Sir/Madam

SITE: Creag Dhubh to Dalmally
PLANNING REF: ECU00002199
OUR REF: DSCAS-0032466-BQP
PROPOSAL: Creag Dhubh to Dalmally 275kV Connection

Please quote our reference in all future correspondence

[Audit of Proposal](#)

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

[Asset Impact Assessment](#)

According to our records, the development proposals impact on existing Scottish Water assets.

The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team via [our Customer Portal](#) to apply for a diversion.

The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction. Please note the disclaimer at the end of this response.

[Drinking Water Protected Areas](#)

A review of our records indicates that the proposed activity falls partly within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. The Cladich Intake catchment supplies Cladich Water Treatment



To find out more about connecting your
General to the water and waste water supply visit:



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So, how are we doing?
We'd love to know what we're doing well or could do better. We promise we're listening. [click here](#) to tell us...

Works (WTW) and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number **0800 0778 778** and local Scottish Water contact details will be provide prior to construction work commencing.

The chosen route will run through the Cladich Intake catchment and towers 4 – 8 all have the potential to impact the operational capability of Cladich WTW, the surrounding drinking water catchment and associated assets. Therefore the risk to drinking water quality and quantity is high.

There are also a number of Scottish Water assets along the route. There is a 4" asbestos cement (AC) and a 125mm medium-density polyethylene (MDPE) water distribution main near the northeast end of the route. These pipes appear to be in the road verge running past the substation. A separate 4" AC water distribution main follows the route of the B8077 and there is also a 3" AC raw water main near Cladich running northeast from the raw water intake (RWI), which was confirmed in our response regarding the route options.

Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm.

We welcome that reference has been made to the Scottish Water response to the previous consultation.

The fact that this area is located within a drinking water catchment should be noted in future documentation. Also anyone working on site should be made aware of this during site inductions.

We would request further involvement at the more detailed design stages, to determine the most appropriate proposals and mitigation within the catchment to protect water quality and quantity. In particular we need to better understand your planned access routes and if any water crossing points will be required within the Cladich Intake catchment. If you have to cross the AC raw water main at any point, we would ask SSEN to pay for a new main with designated crossing points before construction work commences

We would also like to take the opportunity, to request that 3 months' notice is given in advance of any works commencing on site, Scottish Water is must be notified at protectdwsources@scottishwater.co.uk. This will enable us to be aware of activities in the catchment and to arrange a site meeting, which will be necessary.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.



There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

General notes:

- ▶ Scottish Water asset plans can be obtained from our appointed asset plan providers:
 - ▶ Site Investigation Services (UK) Ltd
 - ▶ Tel: 0333 123 1223
 - ▶ Email: sw@sisplan.co.uk
 - ▶ www.sisplan.co.uk

I trust the above is acceptable however if you require any further information regarding this matter please contact me on **0800 389 0379** or via the e-mail address below or at planningconsultations@scottishwater.co.uk.

Yours sincerely,

Angela Allison

Development Operations Analyst

developmentoperations@scottishwater.co.uk

Scottish Water Disclaimer:

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."



To find out more about connecting your
General enquiry to the water and waste water supply visit:



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Brown C (Carolanne)

From: Jacqueline Tait <Jacqueline.Tait@SCOTTISHWATER.CO.UK> on behalf of protectdwsources <protectdwsources@scottishwater.co.uk>
Sent: 16 February 2021 12:40
To: Hughson M (Magnus)
Subject: RE: Scoping - Creag Dhubh to Dalmally 275 kV Connection

Hi Magnus

Thank you for consulting with Scottish Water on the above activity. A more detailed response will be issued by our planning team however from our point of view I can confirm, a review of our records indicates that the proposed activity falls partly within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. The Cladich Intake catchment supplies Cladich Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number **0800 0778 778** and local Scottish Water contact details will be provide prior to construction work commencing.

The chosen route will run through the Cladich Intake catchment and towers 4 – 8 all have the potential to impact the operational capability of Cladich WTW, the surrounding drinking water catchment and associated assets. Therefore the risk to drinking water quality and quantity is high.

There are also a number of Scottish Water assets along the route. There is a 4" asbestos cement (AC) and a 125mm medium-density polyethylene (MDPE) water distribution main near the northeast end of the route. These pipes appear to be in the road verge running past the substation. A separate 4" AC ~~asbestos cement~~ water distribution main follows the route of the B8077 and there is also a 3" AC raw water main near Claddich running northeast from the raw water intake (RWI), which was confirmed in our response regarding the route options.

Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm.

We welcome that reference has been made to the Scottish Water response to the previous consultation.

The fact that this area is located within a drinking water catchment should be noted in future documentation. Also anyone working on site should be made aware of this during site inductions.

We would request further involvement at the more detailed design stages, to determine the most appropriate proposals and mitigation within the catchment to protect water quality and quantity. In particular we need to better understand your planned access routes and if any water crossing points will be required within the Cladich Intake catchment. If you have to cross the AC raw water main at any point, we would ask SSEN to pay for a new main with designated crossing points before construction work commences

We would also like to take the opportunity, to request that 3 months' notice is given in advance of any works commencing on site, Scottish Water ~~is~~ must be notified at protectdwsources@scottishwater.co.uk. This will enable us to be aware of activities in the catchment and to arrange a site meeting, which will be necessary

Kind Regards
Jacqueline Tait
Regulatory Advisor – Sustainable Land Management Team
REDACTED



From: [Erskine A \(Andrew\)](#)
To: [Young R \(Rebecca\)](#)
Subject: 220308 - Scoping - ECU - Creag Dhubh to Dalmally 275 kV Connection - 23 February 2022
Date: 08 March 2022 09:55:37

Hi Rebecca

We have reviewed the information available via the ECU planning portal and note that no new information relating to traffic and transport appears to have been published since Transport Scotland submitted their consultation response on 02 March 2021. Therefore, the comments previously provided are still relevant and should be considered in the preparation of the EIA and any further development of proposals.


Nevertheless, regarding our previous comments on the suitability of traffic data, we would note that data is no longer available from the link provided to Traffic Scotland's National Traffic Data System. We would also highlight that Department for Transport traffic count data is not considered to be an appropriate source of information for the assessment of effects on trunk road network links. As such, any trunk road traffic data informing the assessment can be requested from Transport Scotland.

Additionally, any queries from the applicants consultant should now instead be directed to Alan Kerr (alan.kerr@transport.gov.uk).

Kind regards

Andrew

Andrew Erskine
Network Administrator
Administration Team
Roads Directorate
Tel: 0141 272 7336

 Transport Scotland
Buchanan House, 58 Port Dundas Road
Glasgow, G4 0HF
For agency and travel information visit our [website](#)

Please see our [privacy policy](#) to find out why we collect personal information and how we use it

Transport Scotland, the national transport agency
Còmhadhail Alba, buidheann nàiseanta na còmhadhail

Magnus Hughson
Energy Consents Unit
The Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Your ref:
ECU00002199

Our ref:
GB01T19K05

Date:
02/03/2021

Econsents_Admin@gov.scot

Dear Sirs,

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR CREAG DHUHB TO DALMALLY 275KV CONNECTION

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by Scottish and Southern Energy Networks (SSEN) in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, we would provide the following comments.

Proposed Development

SSEN is proposing to construct and operate a 13.8 km double circuit 275 kV overhead line (OHL) supported by lattice steel towers between a proposed substation at Creag Dhubh to a new switching station in Glen Lochy adjacent to the existing Scottish Power Energy Networks (SPEN) 275 kV overhead line from Dalmally to Inverarnan. The OHL runs between a point approximately 2.3km south of Dalmally in a south-westerly direction to a point approximately 2.8km south of Cladich. The nearest trunk road to the OHL is the A85(T) at Dalmally.

Assessment of Environmental Impacts

Section 10.2 of the SR presents the proposed methodology for assessing the potential impact of traffic and transport associated with the construction phase of the development. This states that the assessment will be based upon the IEMA Guidelines for the Environmental Assessment of Road Traffic, which state that the potential for significant effects will be established using the following thresholds:

- On road links where traffic flows are predicted to increase by more than 30% (or where the number of heavy goods vehicles is predicted to increase by more than 30%); and
- Traffic flows are predicted to increase by 10% or more in any other specifically sensitive areas

We note that the traffic and transport chapter will:

- Address potential disruption to pedestrians, cyclists and existing road users during the construction phase;
- Assess changes to local traffic flows during the construction phase;
- Assess the effect of the changes on the transport network and the level of significance of any effects established; and
- Take account of the objectives of the local and strategic policy.

The SR states that the study area will include the A85(T). Transport Scotland is satisfied with this approach, and would add that the assessment should establish if there are likely to be any significant environmental effects associated with increased traffic on the trunk road network, and any requirement for further trunk road assessment.

With regard to base traffic, the SR states that existing traffic flow information would be requested from Argyll and Bute Council, Transport Scotland and the Department for Transport (DfT) open traffic count site. It also states that should there be a requirement for new traffic count data, this would be obtained through the use of a week-long deployment of Automatic Traffic Counters (ATC). Given the current COVID19 situation, Transport Scotland would not consider any new traffic data collected to be representative, and instead would suggest an alternative source of traffic data - Traffic Scotland's National Traffic Data System (<https://ntds.trafficscotland.org/>). We note that baseline data will be adjusted to an agreed future base case using Low Growth National Road Traffic Forecast (NRTF) estimates. This is considered appropriate.

The SR states that at locations where the relevant thresholds are exceeded, an assessment will be provided as part of the EIA Report to include the likely number of construction traffic movements and the capacity of local roads to accommodate construction traffic, with reference to the potential effects of severance; fear and intimidation; accidents and safety; driver delay; pedestrian amenity; and pedestrian delay. Transport Scotland is satisfied with this approach.

It is noted that any impacts associated with the operational phase of the development are to be scoped out of the EIAR. We would consider this to be acceptable in this instance.

Abnormal Loads Assessment

The SR makes no mention of the possibility of abnormal load deliveries being required, therefore, Transport Scotland would assume there will not be any. In the event that these are required, Transport Scotland will require to be satisfied that their transportation will not have any detrimental effect on structures within the trunk road route path. We would request an Abnormal Loads Assessment be carried out, with the potential impact on the trunk road being established.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact me or, alternatively contact Alan DeVenny at SYSTRA's Glasgow Office on 0141 343 9636.

Yours faithfully

Redacted

Gerard McPhillips

**Transport Scotland
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.

MSS Standing Advice

Section 37

Developers who seek consent for applications under Section 37 of the Electricity Act (1989) should consult the generic scoping guidelines issued by Marine Scotland Science (MSS) (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>). As a means of trying to avoid and/or minimise any impacts on the water quality and fish populations developers should draw up appropriate site specific mitigation measures as outlined in our scoping guidelines including, a water quality monitoring programme, where necessary, (following MSS generic monitoring programme guidelines which are also found at the above website) and the appointment of an Ecological Clerk of Works (ECoW). The ECoW should carry out regular visual inspections of all watercourses (as also outlined in our monitoring guidelines) and oversee the implementation of any monitoring programmes.