



Crarae, Argyll Proposed 275 kV Substation

Planning Statement

November 2022

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1. Introduction & Overview

1.1 Background

- 1.1.1 Scottish Hydro Electric Transmission plc ('the Applicant'), operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission) has submitted a full major planning application for the "Erection of High Voltage Electricity Substation and Formation of Associated Access, Landscaping, Drainage and Means of Enclosure" (the Proposed Development).
- 1.1.2 The Proposed Development forms part of a wider project which also includes an overhead line (OHL) Tie in with three towers, temporary diversions and associated access tracks (the Associated Development) to connect the substation to the transmission network, under Section 37 of the Electricity Act hereafter referred to together as 'the Project'.
- 1.1.3 This is an application for full planning permission for a development categorised as 'national development' within National Planning Framework 3 (NPF3) under the class of development noted as "*new and / or upgraded onshore substations directly linked to electricity transmission cabling in excess of 132 kilovolts*". The application therefore needs to be determined under national development procedures as outlined within the Development Management Regulations.
- 1.1.4 As the Transmission License holder in the North of Scotland, the Applicant has a duty under section 9 of the Electricity Act 1989 to facilitate competition in the generation and supply of electricity. The Applicant is obliged to offer non-discriminatory terms for connection to the Transmission system both for new generation and for new sources of electricity demand.
- 1.1.5 The Project is to construct a new 275 kV substation and OHL Tie In and associated temporary diversions in the vicinity of the existing Crarae substation in order to provide an upgrade to existing to current specification and standards and provide reinforcement to the existing network which will be able to support the continued generation of renewable energy. Two onshore wind farms – Earraghail Wind Farm and Tangy IV Wind Farm, with connection dates of April 2027 are the key drivers for current Argyll reinforcement works.
- 1.1.6 The primary driver for the Project arises from a sustained increase in renewable energy generation proposals applying to connect to the Argyll and Kintyre network. Analysis of these applications, alongside an assessment of existing infrastructure demonstrated that the existing network capability required to be reinforced. The new substation will connect with the recently constructed 275 kV Inveraray to Crossraig OHL network delivered to enhance transmission and connection capacity. As such, reinforcement is being delivered in order to maintain compliance with the standards required as the network operator and to deliver provision for the projected increase capacity for existing and predicted new generation connections.
- 1.1.7 This Planning Statement sets out the positive planning case for the Proposed Development, with reference to the relevant determining planning issues and material considerations. The statement outlines the case for approval both in land use planning policy terms at the local (Argyll & Bute) level, and in relation to the wider national policy context relevant to the delivery of electricity infrastructure that will assist in the delivery of the Government's legally binding 'net zero' commitments.

1.2 Approach

- 1.2.1 Section 25 of the Town and Country Planning (Scotland) Act 1997 (the "1997 Act"), requires that planning decisions are taken in accordance with the statutory Development Plan unless material considerations indicate otherwise.
- 1.2.2 As such the key questions for the Proposed Development at Crarae Substation are:

- > Is the development as proposed consistent with Development Plan policy as set within the adopted Development Plan?
- > Are there material considerations that determine a decision should be made contrary to the Development Plan? Or do material matters further support the position that the Proposed Development should be approved?

1.2.3 In answering these questions consideration is given to whether:

- > the proposal is in the national interest;
- > there is an identifiable need for the Proposed Development;
- > the proposal contributes positively to national or local policy priorities; and
- > the environmental effects of the Proposed Development would be acceptable when considered against the Development Plan policy framework and material considerations.

1.2.4 The planning application is supported by an **Environmental Appraisal** (EA) which examines the environmental effects of the Proposed Development. Due to the nature of the proposal as engineering operations / plant and machinery, under exemptions stated at Regulation 13 (3) of the Development Management Regulations a **Design and Access Statement** (DAS) is not a statutory requirement for this application.

1.3 Key Facts

1.3.1 Key facts relevant to this planning application are:

- > The Proposed Development is identified within Annex A of National Planning Framework 3 (NPF3) as a **National Development** under the class of development noted as “*new and / or upgraded onshore substations directly linked to electricity transmission cabling in excess of 132 kilovolts*”.
- > The Proposed Development is for a **new 275 kV substation to support a wider reinforcement and extension to the OHL infrastructure in the region enabling increased capacity to 275 kV.**
- > The Proposed Development will contribute to **security of supply and provide increased and more resilient infrastructure capacity to facilitate renewable energy connections** in the wider area – all of which forms **vital elements to deliver reinforced network and grid infrastructure required to deliver the Government’s legally binding targets for net zero emissions and renewable energy electricity generation objectives.**
- > The Proposed Development will be delivered in such a way that it is environmentally acceptable and will include a **co-ordinated scheme of landscaping** for the site.

1.4 Structure of this Planning Statement

1.4.1 This report seeks to address the pertinent issues relevant to the determination of the application to aide decision makers in their assessment and conclusions on the proposal.

1.4.2 The report is structured as follows:

- > **Chapter 2** sets out a summary description of the site and Proposed Development and makes reference to relevant planning history. The siting and design approach is also referenced.
- > **Chapter 3** addresses whether the Proposed Development is in accordance with the Development Plan, referencing most relevant policy and drawing upon the findings of the supporting environmental appraisal.

- > **Chapter 4** examines relevant material considerations including national planning policy and energy policy matters.
- > **Chapter 5** presents overall conclusions and a recommendation with regard to what is required by the application of section 25 of the 1997 Act.

2. The Site, Proposed Development & Design Approach

2.1 Site Location & Description

- 2.1.1 The Proposed Development is located in Argyll & Bute approximately 1.6 km north west of Minard and upslope of the existing Crarae substation. Access to the Project would be via an unnamed road that is accessed from the the A83, approximately 2.1 km south west of Minard which leads to the existing Crarae substation.
- 2.1.2 The Project is located within an area of mature coniferous plantation with a small area of marshy grassland in the west. There is open moorland further up slope to the north. The Project sits within an area that is characterised by mountainous landscapes.
- 2.1.3 One area of Ancient Woodland lies adjacent to the existing access track and there are no other statutory or non-statutory ecology, heritage or landscape designations within the Project boundary.
- 2.1.4 The Project is located 1.6 km west of West Loch Fyne (Coast) Area of Panoramic Quality (APQ) and 4 km west of the East Loch Fyne (Coast) APQ. These are locally designated landscapes. There are no habitat designations within 5 km of the site, although Craignure mine SSSI is located approximately 4.2 km to the northeast of the Project.
- 2.1.5 The nearest Listed Building and Scheduled Monument are located approximately 3 km to the south and 1.4 km to the south west respectively. The Crarae Inventory Garden and Designed Landscape is also located 1 km to the east of the Project.
- 2.1.6 The wider surrounding area is sparsely populated with the nearest residential receptor being Strone Farm, located approximately 450 m to the south east of the Project.

2.2 Site Selection and Planning History

- 2.2.1 An increase in generation capacity seeking connection to the network in Argyll and Kintyre area is driving the requirement for further reinforcement in the network. Earraghil Wind Farm and Tangy IV Wind Farm, with connections dates of April 2027 are key drivers for the Crarae substation Project and the Proposed Development subject to this planning application.
- 2.2.2 The need for a new substation in the location in close proximity to the Inveraray – Crossaig 275kV OHL instigated a site selection exercise which examined six potential Site Options. The selection of the preferred substation Site Option at Crarae was undertaken through an appraisal of operational, technical, health and safety, economic and environmental factors. Further details are provided at Section 2.4 of the EA.
- 2.2.3 Following selection, the substation platform location was amended slightly to the southeast in order to limit the required works to the existing OHL which would have been required for a series of technical reasons and would have resulted in greater ground disturbance due to demolition, and re-erection of new towers and foundations. The design being progressed negates the need for the repositioning of any towers, and also reduces the need for extensive cut and fill to create the platform level required as the original selection consisted of steep sloping ground. Mitigation of this nature through design and siting forms a key component of the site selection and project design solution for the Project.
- 2.2.4 An Environmental Impact Assessment (EIA) Screening Opinion request was submitted to Argyll and Bute Council (ABC) in August 2021 and a negative Screening Opinion was issued in March 2022. There is no other known planning history relative to the site.

2.3 The Proposed Development

2.3.1 The Proposed Development is required to connect the new 275 kV electricity substation to the recently constructed 275kV Inveraray to Crossaig OHL network and to provide an upgrade to current specification and standards, and to reinforce the existing network in order to support continued renewable energy generation connections and the wider electricity network.

The Proposed Development – Summary Elements

2.3.2 The Proposed Development comprises a number of key elements as follows:

- > A substation platform in the region of 1.43 ha at a height of 173 AOD;
- > Gas insulated Switchgear (GIS) substation building, maximum height 22 m and single storey control building annexe;
- > 275/33 kV grid transformer (SGT), rated at 120 MVA located in a ventilated building of maximum height 16 m;
- > Two gantries and electrical apparatus to connect the OHL and the proposed substation;
- > A temporary works area (TWA) adjacent to the Proposed Development Site, of approximately 0.67 ha;
- > Diesel generator;
- > Borehole for water;
- > Turning and parking areas;
- > Use of existing forestry access track, approximately 4.7 km in length;
- > Construction of a new access track, approximately 350 m long;
- > A 2.4 m high security fence of palisade construction around the substation platform perimeter; and
- > Foul and surface water drainage including Sustainable Urban Drainage (SUDS) pond and outfall pipe.

In addition, tree felling is required as detailed in the application.

2.3.3 The buildings will be of steel portal frame construction with and metal cladding and roof. There will be some un-housed electrical switchgear and plant located within the platform area. There will be no illumination of the substation at night for normal operation. Flood lights will be installed for use in the event of a fault during the hours of darkness, or during the over-run of planned works.

2.3.4 Small scale alterations to the FLS access from the A83 may be required, these may include widening of the existing bellmouth, increasing turning radii and improving visibility splays. Between the access point and the Proposed Development site, works may include widening at bends and road strengthening to accommodate construction vehicles. It is proposed that where necessary conditions can be attached to control movements via a Construction Traffic Management Plan. Where necessary appropriate consents will be secured prior to development.

- 2.3.5 Tree felling, cut/fill embankments and associated culvert and drainage works will also be undertaken across the application site to accommodate the substation development. The redline site area extends 18.8 ha with the completed substation site platform footprint 1.43 ha on completion of construction and landscaping works.
- 2.3.6 It is not proposed to illuminate the substation at night for normal operation. Flood lights would be installed but only used in the event of a fault during the hours of darkness, or during the over-run of planned maintenance works, or when sensor activated as security lighting for night-time access.
- 2.3.7 A more detailed summary of the key elements of the proposal is provided within the EA.

Construction

- 2.3.8 A full description of the construction and access works programme is provided at Section 2 of the EA. It is proposed that a Traffic Management Plan (TMP) will be prepared and agreed with ABC in advance of construction. This will include traffic management measures to ensure that the proposed development will not have an unacceptable impact on the public road network of nearby road users.
- 2.3.9 A Peat Management Plan will be prepared to manage potential impacts on peat.
- 2.3.10 Other potential effects of construction will be considered within a Construction Environmental Management Plan (CEMP) to ensure that commitments to mitigate environmental impacts that may arise are delivered.
- 2.3.11 The construction programme provides for a 30 month construction period. In order to achieve this, hours of working between 0700 to 1900 on week days and 0700 to 1800 on Saturdays would be required. Construction works would only take place during these hours and in planning the works, our contractors will look to minimise the impact of construction noise on neighbours and the public. There may be times when construction work would be required out of these hours due to time critical activities, and this would only take place with the prior agreement of ABC. Works outside of daylight hours requiring illumination would be undertaken in accordance with relevant guidance to avoid light spill.

Forestry

- 2.3.12 The Proposed Development site is located within a large commercial conifer plantation (largely Sitka spruce *Picea sitchensis* with some presence of Lodgepole pine *Pinus contorta* in areas). The age classes and growth rates vary throughout (8-12; 13-16; and 17-20 years old) with areas of both harvestable Sitka spruce and areas of poorer growth that would be mulched. Further details are provided within the EA Chapter 5.

Surface Water Drainage Proposals

- 2.3.13 The surface water runoff within the substation platform area would be managed using a sustainable urban drainage system (SUDS), providing filtration and attenuation, prior to discharge to a local watercourse. The surface water runoff will be attenuated to equivalent greenfield runoff rates, which would ensure that the runoff from the Project would not result in any increase in flood risk within the wider surface water catchment.

Watercourse Crossings

- 2.3.14 Possible temporary watercourse crossing upgrades, including the upgrade to the existing culverted watercourse, may be required on the access track from the public road during the construction of the Project. As above, watercourse crossings would be designed and constructed to comply with legislation set out in The Water Environment (Controlled Activities) (Scotland) Regulations 2011, as amended.

Private Water Supplies

- 2.3.15 A PWSRA has been undertaken for the Project. The PWSRA identified all PWS within a 2 km radius of the Project and confirms the location of source water supplies. Where new access tracks or upgrades to existing tracks are required, within 100 m of supplies, mitigation measures are proposed. Potential effects and mitigation measures are discussed in detail within Chapter 6: Hydrology, Hydrogeology and Geology Appraisal and associated technical appendices.

2.4 Associated Development

- 2.4.1 The Associated Development comprises the construction of a new OHL section and associated towers in order to connect the proposed development to the new 275kV OHL.

Components of the Associated Development:

- > Construction of two new terminal lattice steel towers to support the connection into the new 275 kV Crarae substation including new downlead terminations;
- > Construction of one angle lattice steel tower to replace the existing terminal tower at the existing 132 kV Crarae substation including realignment of the OHL;
- > Five temporary towers or masts and associated temporary OHL diversion to facilitate the build of the new towers to avoid long network outages;
- > Approximately 622 m of temporary access tracks providing access to the existing Inveraray to Crossaig overhead line (OHL);
- > Dismantling of one lattice steel tower located between the two new terminal towers at the new 275 kV Crarae substation.

- 2.4.2 These works will be subject of a separate application under Section 37 of the Electricity Act that will be submitted to the Scottish Government Energy Consents Unit (ECU) in tandem with the Proposed Development planning application.

- 2.4.3 It is proposed that the Associated Development works will utilise the same access and temporary works as the Proposed Development, however there will be additional tracks required from the Proposed Development to the tower locations for maintenance purposes.

2.5 Design Approach

- 2.5.1 The substation design is driven by a number of technical considerations and once it is operational, it will have restricted access for security and health and safety reasons, such that no public access will be allowed on site.

- 2.5.2 Along with the technical requirements which determine the design, it has also been important to consider the site context, layout and screening provisions provided to the Proposed Development within the existing landscape.

- 2.5.3 The key design principles followed are in summary:

- > Optimise the development 'footprint' to minimise visual impact in the wider landscape and utilise existing screening afforded by forestry and landform.
- > Minimise the disturbance or displacement of protected species.
- > Utilise existing access and minimise need for land take with regard to reducing potential disturbance on natural and human environment.
- > Minimise traffic required during construction.

- > Minimise the potential impact on nearby sensitive human receptors during construction and operation.
- > Propose appropriate architectural form, colour and materials.
- > Avoid sensitive habitats and look to replace any valuable habitats as part of the long-term management of the Site.
- > Locating the substation a distance of up to 1 km on either side of the recently constructed Inveraray to Crossaig 275 kV OHL.
- > Ensure the layout is carefully considered to minimise impact on peat and ensure reuse where possible.
- > Avoidance of the Douglas Water Hydro Scheme pipeline.
- > Landscape mitigation measures, using locally native species.
- > Locating the substation built form outwith areas of deep peat.

3. Is the Development in accordance with the Development Plan?

3.1 The Development Plan

3.1.1 The statutory Development Plan covering the Site comprises:

- > The Argyll & Bute Local Development Plan (adopted March 2015) (ABLDP);
- > Supplementary Guidance (March 2016); and
- > Supplementary Guidance 2 (December 2016).

3.1.2 The ABLDP sets out the general planning policies for the Council area. A review is underway and consultation on the Proposed Plan (November 2019) was completed in January 2020. A delay in progressing the Plan has arisen due to COVID 19 however it is understood that the adoption of 'LDP2' is expected around October 2022 with the Examination process due to take place in advance of that date.

3.1.3 ABC has advised that all planning assessments will now include a dual assessment against the adopted LDP where a different policy position is presented by relevant, unopposed elements of LDP2.

3.1.4 It is noted that the general LDP policy support for necessary infrastructure to facilitate sustainable development benefits in the area has not materially altered in LDP2.

3.1.5 In addition, Scotland's Fourth National Planning Framework (NPF4) is currently issued for public consultation and is also a material consideration, albeit of limited weight at this time. Once approved (expected in late 2022) the NPF4 will become part of the statutory Development Plan. This change may therefore occur during the determination period of this planning application.

3.2 Key LDP Policy Provisions

3.2.1 The key ABLDP policies relevant to the Proposed Development are:

- > LDP STRAT 1 – 'Sustainable Development';
- > LDP DM1 – 'Development within the Development Management Zones';
- > LDP3 – 'Supporting the Protection, Conservation and Enhancement of our Environment';
- > LDP6 – 'Supporting the Sustainable Growth of Renewables'; and
- > LDP10 – 'Maximising our Resources and Reducing our Consumption';

3.2.2 In addition, the following policies are also relevant:

- > LDP5 – 'Supporting the Sustainable Growth of our Economy';
- > LDP9 – 'Setting, Layout and Design'; and
- > LDP11 – 'Improving our Connectivity and Infrastructure'.

3.2.3 LDP primary policy is supported by ABC Supplementary Guidance 1 (SG1) and 2 (SG2) which provides a series of more detailed policy provisions to support primary policy (particularly in respect of LDP3) and as such provides *supporting* policy detail behind protection of environmental resources, heritage assets, road improvements and other renewable energy forms.

Key Policy Summaries

- 3.2.4 **Policy STRAT 1** is an over-riding policy which sets the sustainable development principles which should influence decision making on land use, regeneration, transport and strategic transportation proposals. Policy provides that developers should seek to demonstrate that the sustainable development principles as set are demonstrated within their proposed development, including:
- A) Maximise the opportunity for local community benefit;
 - B) Make efficient use of vacant and /or derelict land including appropriate buildings;
 - C) Support existing communities and maximise the use of existing infrastructure and services;
 - D) Maximise the opportunities for sustainable forms of design including minimising waste, reducing our carbon footprint and increasing energy efficiency;
 - E) Avoid the use of locally important good quality agricultural land;
 - F) Utilise public transport corridors and active travel networks;
 - G) Avoid the loss of important recreational and amenity open space;
 - H) Conserve and enhance the natural and built environment and avoid significant adverse impacts on biodiversity, natural and built heritage resources;
 - I) Respect the landscape character of an area and the setting and character of settlements;
 - J) Avoid places with significant risk of flooding, tidal inundation, coastal erosion or ground instability; and
 - K) Avoid having significant adverse impact on land, air and water environment.
- 3.2.5 **Policy LDP DM1** establishes the acceptable scales of development in each of the development management zones as set by the LDP Proposals Map. **The policy is silent on electricity infrastructure.** It is noted that within 'Very Sensitive Countryside' (F) that **encouragement will only be given to specific categories of sustainable forms of development on appropriate sites and that such categories include "(i) renewable energy related development"**.
- 3.2.6 The Council recognise the value of their natural environment, biodiversity, geodiversity, soils and landscape as outstanding assets in terms of diversity and quality. **Policy LDP3** seeks to **maintain and enhance the quality of that environment** though the policy detail in LDP3 and associated policies within Supplementary Guidance. LDP3 provides that applications for planning permission will be assessed with **"the aim of protecting conserving and where possible enhancing the built, human and natural environment"**.
- 3.2.7 Proposals will not be supported where they do not meet these aims and where it *"has not been ascertained that it will avoid adverse effects, including cumulative effects, on the integrity or special qualities of international or nationally designated natural and built environment sites"*. Likewise, proposals that have significant adverse effects, including cumulative, on the special qualities or integrity of locally designated natural and built environment sites will not be supported.
- 3.2.8 LDP3 provides that *"Where there is significant uncertainty concerning the potential impact of a proposed development on the built, human or natural environment, consideration will be given to the appropriate application of the precautionary principle, consistent with Scottish Planning Policy"*. The Applicant has undertaken the necessary assessments and there is no uncertainty of findings, as such there is no suggestion that the precautionary principle should be engaged.

- 3.2.9 **LDP6 supports renewable energy developments where they are consistent with the principles of sustainable development** and it can be demonstrated that there would be no unacceptable significant adverse effects, individually or cumulatively on communities, the environment, landscape character or visual amenity, and where proposals would be compatible with adjoining land uses.
- 3.2.10 The **LDP does not however provide specific policy or a statement within its renewable energy policy (LDP6) to provide for transmission or grid connection for such renewables**. However, through the provision of support for the growth of renewables consideration of reinforcing and enhancing transmission and grid connection requirements directly follows as necessary and critical infrastructure in order to achieve the aims of Policy.
- 3.2.11 Further information and detail on matters relating to the growth of renewables is provided within **Supplementary Guidance 2**. In this regard, SG2 provides further detail on the delivery of renewables with again limited reference to transmission infrastructure or grid requirements or support. SG2 does however cite the **Argyll & Bute Renewable Energy Action Plan (2010)** as setting out key delivery priorities required to deliver sustainable renewable energy development in the area which states the Council will:
- > ***“Work with partners to secure capacity within the transmission network in order to unlock the future potential of our considerable renewable energy assets and provide confidence to investors”.***
 - > ***“Ensure the grid is fit for purpose to meet renewable energy opportunities – Inveraray – Crossaig Overhead line replacement, Northern Argyll substation....”***
- 3.2.12 **Policy LDP 10 provides support for all development proposals which seek to maximise the area’s resources and reduce consumption where they accord with the following:**
- > The settlement strategy;
 - > Sustainable Design principles;
 - > Minimising waste and / or contributing to recycling;
 - > Minimising the impact on the water environment both in terms of pollution and abstraction;
 - > Avoiding areas subject to flood risk or erosion;
 - > Minimising the impact on biodiversity and the natural environment;
 - > Safeguarding our mineral resources and minimising the need for extraction;
 - > Avoiding the loss of trees and woodland;
 - > Contributing to renewable energy generation;
 - > Avoiding the disturbance of carbon rich soils; and
 - > Safeguarding our best agricultural land.
- 3.2.13 Supplementary Guidance provides further information and detail in relation to climate change, renewable energy and sustainable design.
- 3.2.14 Overall, the presumption within Policy LDP10 and the supporting written statement seeks to address climate change by reducing emissions and refers to the Climate Change targets relevant at the time of publication (in 2015). Paragraph 6.3.4 states that ***“Achieving these targets will require coordinated action and a significant commitment to adapting the built environment to reduce energy and other resource consumption as well as providing a framework for the development and deployment of renewable electricity generation***

technologies". It can be reasonably presumed that support for works to the transmission network and grid is covered within this statement.

Additional Key Policies

- 3.2.15 Supporting the Sustainable Growth of the Economy is addressed within **Policy LDP5 with a view to supporting sustainable economic growth throughout the Council area** and seeks to ensure that different spatial requirements of various sectors and scales of business are able to be met. Further detail is provided within Supplementary Guidance **with the main potential growth sectors including renewables. Clearly setting the need to support renewable energy as a key business and industry** for the area.
- 3.2.16 **Development Setting, Layout and Design is addressed in Policy LDP9** and requires developers to produce and execute a high standard of appropriate design with particular **focus on siting and position to pay regard to context and location, ensuring integration with setting and sensitivity of the area.** In terms of design of development and structures must be compatible with the surroundings with attention to massing, form, sensitive / designation locations, with the need for higher quality design in higher sensitivity areas.
- 3.2.17 **LDP11** provides support for the Council's **desire to maintain and improve internal and external connectivity and make best use of existing infrastructure by ensuring maintenance of public access, rights of way, provision of public transport links, integration of transport modes etc, but also 'ensure the location and design of new infrastructure is appropriate'**. Again, no specific reference to electricity infrastructure is provided and the driver is transportation. As such the policy is most relevant in considering access to the Proposed Development. Paragraph 7.3.1 states *"The distinctive geography, environmental sensitivities and landscape character of Argyll and Bute present a range of issues related to this. Delivery of connectivity and infrastructure that integrate with the settlement and spatial strategy will help us deliver successful sustainable development of the area for all"*.

3.3 Other Policies

- 3.3.1 The key Supplementary Guidance policies of relevance are set out in **Table 3.1** below.

Table 3.1: Other Supplementary Guidance Policies (SG1 & SG2)

ABLDP SG Policy	Policy Summary
SG LDP ENV1	Additional detail to LDP3 guiding assessment of development impact on habitats, species and biodiversity. Requires habitat surveys and mitigation for national and local interest.
SG LDP ENV 2	Supports LDP3 in regard to protection of European designations with support not being given to development giving rise to adverse impact unless there is not alternative and there are imperative reasons of over-riding public interest.
SG LDP ENV 4	Policy with presumption against development which affects SSSIs and NNR unless the objectives of designation and overall integrity will not be compromised and/or any significant adverse effects on the qualities of designation are outweighed by social, environmental or economic benefits of national importance and not other less ecologically damaging locations can be reasonably utilised.
SG LDP ENV 6	Supports LDP 3 via presumption to protect trees, groups of trees and areas of woodland. Resisting development likely to have an adverse impact on trees and ensuring adequate provision is made for preservation and where appropriate planting of new including compensatory planning and management agreements.

ABLDP SG Policy	Policy Summary
SG LDP ENV 7	Supporting policy regarding water quality providing protection for water quality and quantity alongside ecological status with a presumption against development that have a significant detrimental impact which cannot be satisfactorily mitigated to requirements of EU Water Framework Directive
SG LDP ENV11	<p>Policy presumption regarding protection of soil and peat resources with development only supported where appropriate measures are taken to maintain soil resources and functions relevant and proportionate to scale of development.</p> <p>Development with potential significant adverse effect on soil resources and functions or peat structure and function in terms of disturbance, degradation or erosion will not be supported unless it is demonstrated:</p> <ul style="list-style-type: none"> • Adverse effects are clearly outweighed by social, environmental or economic benefits of community wide importance arising from proposals, AND • A soil or peatland management plan is submitted which clearly demonstrates how unnecessary disturbance, degradation or erosion will be avoided and how any impacts will be mitigated as much as possible. Evidence of best practise in movement, storage, management and reinstatement of soils must be submitted with planning application.
SG LDP ENV12	Provides that ABC will resist any development in or affecting an NSA which would have adverse effect on integrity or would undermine its Special Qualities unless it can be demonstrated there is no significant adverse effects on the landscape quality for which it is designated, or that this is outweighed by social, environmental or economic benefits of national importance.
SG LDP ENV13	Resists development in or affected and Area of Panoramic Quality (APQ) where there will be significant adverse impact on character of the landscape unless it can be demonstrated that this is outweighed by social, economic or environmental benefits of community wide importance. Requires highest standards of design, siting, landscape and boundary treatment in all proposals with potential effect.
SG LDP ENV14	Core Landscape policy supporting LDP3 relating to areas outwith NSAs or APQs and provides that ABC will consider landscape impact and will resist development when its scale, location or design will have significant adverse impact on character unless it is demonstrated that effects are outweighed by social, economic or environmental benefits of community wide importance, and that the Council is satisfied that all possible mitigation has been incorporated into proposals.
SG LDP ENV15	Provides that where development would affect a heritage asset or its setting it will be expected that the impact is assessed and appropriate measures to protect and preserve the special asset proposed.
SG LDP ENV16a	Provides guidance on the assessment of proposals with an impact on listed buildings and their setting requiring detailed assessment and suitable mitigation / design to protect the integrity of the asset.
SG LDP ENV19	Presumption in favour of retaining, protecting and preserving Schedule Monuments and the integrity of their settings. Proposals with and adverse impact will not be permitted unless there are exceptional circumstances.

ABLDP SG Policy	Policy Summary
SG LDP ENV20	Provides guidance on the assessment of proposals with an impact on Sites of Archaeological Importance, requiring appropriate assessment, mitigation and recording. Preservation in situ is preferred where possible. Requirement for detailed mitigation and consultation with West of Scotland Archaeology Service (WoSAS).
SG LDP TRAN4	Provides additional detail to Policy LDP11 on utilising new and existing public roads, private roads and private access solutions to development subject to road safety and design issues being satisfied and in appropriate circumstances.
SG LDP TRAN5	Provision that where development proposals will significantly increase vehicular or pedestrian traffic on substandard private or public approach roads, then developments will be required to contribute proportionately to improvements to an agree section of the network.
SG LDP Sustainable Siting and Design	Requires careful consideration of siting and design of particular relevance to proposals is guidance on isolated commercial/industrial development. Use of existing and created landform, screening and material to minimise impact and visibility from public roads, viewpoints and local communities. All development should be designed, sited and built to be sustainable reducing environmental impact, energy efficient, protecting agricultural and environmental assets and using appropriate materials.

3.3.2 Whilst the above policies have also been taken into account, it is considered that:

- **Policies LDP DM1**, supports the delivery of appropriate development in the countryside and very sensitive countryside zones, including renewable energy related development;
- **STRAT1**, supporting sustainable development in appropriate locations;
- **LDP6**, supporting the growth and delivery of renewable energy, with reference to supporting transmission and grid infrastructure provided within SG reference to the Argyll & Bute Renewable Energy Action Plan,
- **and LDP10** which supports development that seeks to maximise the areas resources,

are the lead policies for the determination of the application.

3.3.3 These key policies bring into scope a wide range of environmental considerations as set within **Policy LDP3**.

3.4 LDP2 – Proposed Plan

3.4.1 As noted, LDP2 is submitted to Ministers for Examination with targeted adoption in Autumn 2022. ABC has indicated that proposals will be dual assessed against the LDP2 Proposed Plan and the adopted LDP.

3.4.2 Critically, it has been noted to SSEN Transmission within pre-application responses on this (and associated) projects within the Argyll and Bute area, that the general LDP policy support for necessary infrastructure to facilitate sustainable development benefits in the area has not materially altered in LDP2.

3.4.3 With regard to supporting renewable energy, LDP2 recognises the diverse mix of potential renewable energy generation opportunities within their area and acknowledges the significant contribution ABC can make towards meeting the Scottish Government’s targets for

renewable generation. The written statement notes *“These targets are important given the compelling need to secure more sustainable forms of energy production in order to reduce out carbon footprint”*. The main aim of planning policy in this regard is therefore to *“ensure that renewable energy projects are delivered in an all-round sustainable manner”*.

- 3.4.4 LDP2 does not introduce specific reference to the consideration of applications for electricity transmission infrastructure within the written statement, and no specific policy on the matter is introduced, and as such maintains the current policy position within the LDP.

3.5 Policy Appraisal

General

- 3.5.1 It is considered that the key planning matters to be considered for the determination of the application are set out below:

Strategic Importance of the Site

- 3.5.2 The delivery of the proposed 275 kV substation is critical to the delivery of increased capacity for committed and proposed renewable energy generation in the region. The proposed substation will also ensure security of existing supply and is an important component of the wider network improvements and reinforcement in the Argyll region to transmit renewable energy captured in the area to the wider electricity network. The substation is a key element of optimising the benefits of the new 275 kV OHL to which it will be connected.
- 3.5.3 The proposals fall within Annex A of National Planning Framework 3 (NPF3) as a ‘National Development’ under the class of development noted as “new and / or upgraded onshore substations directly *linked to electricity transmission cabling on in excess of 132 kilovolts*”.
- 3.5.4 The proposals seek to reinforce existing critical infrastructure of national importance at a strategic location in the transmission network. The maintenance and capacity of such infrastructure is critical for supply and to ensure efficient transmission of increasing sources of renewable generation, central to the delivery of net zero, now recognised, as a ‘code red’ worldwide emergency. This matter is further referenced below in the context of the latest Scottish Government policy pronouncements on net zero and the climate emergency.
- 3.5.5 The Proposed Development has been sited in close proximity to the new 275 kV OHL in order to capitalise on the OHL upgrade and increased capacity and facilitate grid connection requests and local transmission needs. The specific site location is strategic to the network in this regard minimising required tie ins to existing OHL (associated works) through proximity to the OHL and known generation schemes.
- 3.5.6 The site has been chosen following detailed site option assessments within the wider search area based upon the strategic location need described above taking account of environmental constraints of not just the substation development, but also those of the potential re-routing of existing lines to alternative sites more distant from the line. It is important to note that the other sites considered at site selection stage had significantly greater potential impact environmentally, but also technically offering less strategically viable locations in terms of construction, operation and maintenance. Further as noted previously the chosen site was further designed post selection to further limit potential environmental effects and ground disturbance, alongside limiting cut and fill and associated effects thereof.
- 3.5.7 LDP DM1 encourages sustainable forms of development and classifies the region into broad development management zones. **The Policy LDP DM1 recognises that proposals which “directly support the provision of essential infrastructure” will accord with policy.** The strategic importance of the Proposed Development, essential to delivering the transmission of electricity from renewable generation is therefore considered to be wholly consistent with this

¹ The Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (2021)

policy provision. Further, policy recognises that **‘Renewable Energy Related Development’ can also be considered an appropriate use in sensitive countryside locations. The Proposed Development is directly related to renewable energy development.**

- 3.5.8 The strategic importance and need for the development is therefore clear and is considered to be a matter that should be afforded great weight.

Impact on the Environment

- 3.5.9 Policy **LDP10** supports all development proposals which seek to maximise the areas resources and reduce consumption where they accord with a series of criteria including the settlement strategy, sustainable design principles and minimising the impact on the environment.
- 3.5.10 Policy **STRAT 1 sets clear guidance on the sustainable development principles** the Council expects all development to follow and includes clarification on environmental considerations and the need to demonstrate effects and impacts thereof.
- 3.5.11 Policy **LDP3 supported by SG provides the lead policy on the assessment of environmental impacts** and recognises that where locations are sensitive, mitigation may help to address concerns and should be considered as part of the proposals. Applications will be assessed with the aim of protecting, conserving and where possible enhancing the built, human and natural environment and proposals will not be supported when they do not do that in respect of:
- A –biodiversity, geodiversity, soils and peat, woodland, green networks, wild land, water environment and the marine environment.
- B –the established character and local distinctiveness of the landscape and seascape in terms of its location, scale, form and design.
- C – the established character of the built environment in terms of its location, scale, form and design.
- Further, proposals will not be supported where:
- D - it has not been ascertained that it will avoid adverse effects, including cumulative effects, on the integrity or special qualities of international or nationally designated natural and built environment sites (further detail provided in SG).
- E – it has significant adverse effects, including cumulative, on the special qualities or integrity of locally designated natural and built environment sites.
- 3.5.12 The proposed Crarae substation is required to increase capacity for connections to the new 275 kV OHL. Whilst it is recognised that the reinforcement and development of the 275 kV substation brings with it some impact on the local environment, the ability to reinforce infrastructure in this location brings significant environmental benefits when considered against assessed alternatives. The site has been felled as part of a wider commercial felling programme and is of low ecological and conservation value. There are no nationally or local landscape designations within the site and no significant effects contrary to the Development Plan are identified.
- 3.5.13 The Proposed Development has been subject to an EA and has been designed in close consultation with key stakeholders and taking account of community and stakeholder feedback from consultation exercises and discussions with Council Officers.
- 3.5.14 The key areas of environmental effect have been fully assessed and appropriate mitigation designed into the proposals.
- 3.5.15 The EA submitted as part of the planning application submission provides a full assessment of the likely significant environmental impacts that could arise. That content is not repeated;

however, it is important to consider the key planning considerations arising from the EA such that an assessment of the proposals against LDP3 and associated SG policies can be presented.

3.5.16 A summary of the key environmental considerations by topic is provided below:

Siting and Design

3.5.17 The proposals seek to deliver modern, fit for purpose infrastructure utilising optimal design and proposes a GIS approach which encloses the majority of infrastructure inside buildings, which helps to mitigate visual impact of incongruous technical equipment, protects equipment from negative maritime impacts, and reduces potential noise.

3.5.18 In terms of siting and design the EA provides a more detailed consideration and assessment however relative to the LDP:

- > The proposal meets the requirements set out in Policy LDP10 (supported by 'SG LDP Sustainable Siting and Design') requiring the use of Sustainable Siting and Design principles by demonstrating sensitivity and respect towards the local distinctiveness of the landscape setting and form by siting buildings and access such that the intrusion of the new feature in the landscape is sensitive and minimised. In particular, the design of the GIS buildings and the use of non SF6 gas, if possible, to reduce climate change impacts of any gas leaks.
- > The proposal is consistent with Policy LDP3 as it has taken account of the existing topography, site context and physical area and will not have an unacceptable significant impact on the environment.
- > The design and siting carefully considered the impact of the Proposed Development on environmental features and designations in the immediate and wider area. The site size has been optimised relative to the required infrastructure and technical requirements and where possible the use of natural contours and existing and proposed landscaping has been utilised to screen the development in the medium to long term.

Landscape & Visual Considerations

3.5.19 Chapter 3 of the EA addresses landscape and visual matters to identify and predict landscape and visual effects of the Proposed Development, including Associated Development. A 5km Study Area from the Proposed Development has been adopted. This has been informed by analysis of Zone of Theoretical Visibility (ZTV) maps and early appraisal of potential effects. It is considered that any notable landscape or visual effects would be confined within this geographical area.

3.5.20 The Proposed Development is located within an area of commercial forestry where the wider landscape consists of a patchwork of commercial forestry, pastoral farmland and open moorland.

3.5.21 The surrounding landscape is very sparsely settled with the closest residential receptors including isolated farmsteads known as Stron and Garvachy which are located approximately 500 m to the south east. A'Chruach and A'Chruach Phase 2 Wind Farms are located approximately 2.3 km to the west / north west of the Proposed Development at the closest point. The wind turbines are a recognizable feature across open upland areas throughout the wider landscape context. The existing Crarae substation is located to the east of the Proposed Development, along with associated overhead lines existing outwards from this to the north, south and west.

3.5.22 Chapter 3 of the EA sets out a detailed analysis of existing landscape character and confirms that the Proposed Development site is not located within a landscape designation. Two Areas of Panoramic Quality (APQ) extend within 5 km of the site, both of which incorporate patchworks of forestry, scrub, open grassland and agricultural fields. In addition, Crarae

Garden is located 1.5km to the east and is included within the Inventory of Garden and Designed Landscapes (GDL).

- 3.5.23 An assessment of the Visual Baseline and Receptors is provided in the EA which identifies the nearest settlements, the closest being Minard some 1.8km to the southeast. A number of other dispersed dwellings within 3km of the site are listed, alongside the identification of a series of recreational receptors and road and rail receptors.
- 3.5.24 The location of the Proposed Development has been chosen to avoid any notable ridgelines or visually prominent sections of skyline. Mitigation through design is central to the site selection process. The site is located in an area of commercial forestry with limited receptors in the immediate vicinity. The surrounding forest in combination with undulations in the local landform would notably restrict views across wider parts of the Study Area.
- 3.5.25 The Proposed Development is located in close proximity to existing electricity infrastructure including the existing Crarae Substation to the east and OHLs to the east and north. The Proposed Development would primarily exert its influence over a landscape already partially characterised by existing infrastructure development and this helps to avoid the spread of further infrastructure into wider parts of the surrounding landscape.
- 3.5.26 In design terms, the proposals seek to incorporate a comprehensive mitigation strategy to integrate the Proposed Development into the surrounding landscape, using the most appropriate methods of lessening its potential influence on both landscape and visual amenity, including:
- > Limiting landscape clearance to necessary areas only to minimise the geographic spread of infrastructure and limit the potential impact on landscape fabric;
 - > Use of existing forestry tracks to minimise effects; any
 - > Use of recessive colour and materials to paint buildings and equipment to assist in blending into the surrounding landscape context comprising plantation forestry;
- 3.5.27 An assessment of the predicted effects arising from construction and operation has been undertaken, including assessment of potential cumulative effects and consideration of the effects of the associated and ancillary development. These are reported in full in Chapter 3 of the EA.
- 3.5.28 In summary, the Proposed Development would result in the permanent loss of a localised area of forestry, which represents an extremely small parcel of land within an expansive area of surrounding forestry, in close proximity to existing electricity infrastructure. In terms of landscape effects there would be no notable effects on landscape character or designations, largely due to siting within existing infrastructure and use of existing landform and screening.
- 3.5.29 Visual effects would be extremely restricted based on the site location which exhibits a high degree of visual enclosure due to the surrounding forestry and the undulating nature of the local topography. The Proposed Development would be fully screened from the vast majority of receptors and represents a very minor element within more open vantage points. No notable effects on views experienced by residents, recreational receptors or road users are predicted.
- 3.5.30 In terms of cumulative effects, the Proposed Development would augment the presence of existing power-related infrastructure in the locality, in particular the wind farm and the existing Crarae substation and their associated OHLs. Due to the limited footprint and visually enclosed location, the Proposed Development would not notably contribute to, or increase, the overall level of cumulative effect across the landscape character areas, designations or views experienced by residents, recreational receptors or road users.
- 3.5.31 Overall, the Proposed Development is assessed as having a very limited and localised effect on landscape character and visual amenity. This is consistent with LDP Policy SG ENV13 and 14 and consequently LDP3 which encourage the use of siting and design to minimise

effects on landscape and visual context and features and encourages mitigation such that any potential effects are offset.

Cultural Heritage and Archaeology

- 3.5.32 Consideration of Cultural Heritage and Archaeology is presented in Chapter 7 of the EA where the potential effects of the Proposed Development on Cultural Heritage receptors are assessed. A 2 km Study Area for designated cultural heritage assets and a 250 m radius Study Area for non-designated assets was established from the redline boundary. A 50 m radius area of investigation for the permanent and existing access tracks within the redline boundary is also prescribed. The same Study Area basis has been adopted for the Associated Development.
- 3.5.33 There are no designated heritage assets within the Proposed Development site. Nor are there any World Heritage Sites, Inventoried Historic Battlefields or Conservation Areas within 2km of the site. The number and range of designated assets within or just outside of the 2 km Study Area is limited and includes Crarae Garden and Designated Landscape and three Scheduled Monument (SM), all in excess of 1.3 km from the Proposed Development. The assessment baseline is similar for the Associated Development.
- 3.5.34 Initial assessments of setting as a potential indirect impact were carried out and field investigations recommended for Crarae, Brainport Bay (SM) and Crarae Lodge (SM).
- 3.5.35 There is one known non-designated asset named Feorlin: Shieiling within the Proposed Development. One previously unknown non-designated asset was identified within 50m of the Associated Development's permanent access track as a result of an archaeological walkover (a standing stone circa 2 m from the track). A further seven non-designated assets are known to lie within 250 m of the Associated Development.
- 3.5.36 An appraisal of likely direct and indirect impacts has been undertaken for the Proposed and Associated Development, along with assessment of cumulative impact. The Standing Stone will be directly impacted by track construction, however with implementation of the proposed mitigation the magnitude of direct impacts is predicted as low. No other impacts are identified.
- 3.5.37 Mitigation measures for cultural heritage and archaeology are directed by national planning policies and planning guidance SPP 2014 and PAN 2/ 2011. These require a mitigation response that takes account of the potential for archaeological remains within the site to be impacted upon, enabling the preservation or recording of any significant remains that may be present.
- 3.5.38 Although the potential for such remains is considered to be low it cannot be discounted and a programme to mitigate the effects of any direct impacts is proposed. It is recommended that a second survey of the site is carried out prior to works commencing in order to assess changes in design and in areas inaccessible during existing survey work, as a result of dense juvenile tree cover. Whilst there is considered to be low potential for impact to other known assets as a result of the development, it is recommended that an archaeological watching brief is deployed during all ground-breaking works. For the standing stone which lies within the permanent access tracks, it is recommended that a buffer zone of 10m is demarcated around the asset if works are to be carried out in the vicinity.
- 3.5.39 No significant indirect effects are predicted.
- 3.5.40 With the implementation of proposed mitigation key direct impacts relating to the identified non-designated asset are assessed as minor, with the effect reduced to no impact after works cease. The Proposed and Associated Developments are not anticipated to have major impacts on known assets. A watching brief will satisfactorily mitigate for the discovery of any unknown assets; however, the potential is considered low.

3.5.41 The Proposed Development has been designed and sited to ensure the protection of heritage assets and appropriate mitigation will be implemented to ensure potential assets are adequately protected in line with national and local guidance. This approach is wholly consistent with LDP STRAT 1 which seeks to conserve and enhance the natural environment and avoid significant adverse impacts. SG LDP ENV15 provides guidance on assessment and protection of assets and ENV16a guidance appropriate assessment methods and mitigation design, along with SG ENV19 and 20 which provide further detail as regards Scheduled Monuments and Archaeological assets. The assessment and proposed mitigation approach is wholly consistent with National and LDP policy and no significant adverse effects are identified.

Ecology

3.5.42 Chapter 4 of the EA provides an appraisal of the potential effects on ecology and nature conservation as a result of the Project.

3.5.43 The site is located in an area dominated by commercial forestry which is felled on a rotational basis and is further characterised by associated access roads and tracks. The site and wider area predominantly consists of coniferous plantation and felled woodland as well as continuous and scattered sections of bracken and grasslands.

3.5.44 No sites designated for their nature conservation importance lie within the Project. 11 sites lie within 10 km, with the nearest sites being Moine Mhor Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), which at their nearest point are located 5 km west of the western end of the main access road. 10 Ancient Woodland lie adjacent to the existing access track.

3.5.45 The assessment finds that the habitats and flora identified within the footprint of the Proposed Development are of low botanical value and are common in the wider area. No signs of protected species were found and habitat found in the Site are unlikely to support protected species. It is recommended however that pre-construction checks are undertaken to confirm species presence prior to commencement of construction.

3.5.46 An appraisal of potential effects of construction and operation has been undertaken and is reported in Chapter 4. The Project will result in the permanent loss of 7.93 ha of conifer plantation. The losses are to habitats that are common and widespread and are not significant.

3.5.47 The loss of Sitka spruce plantation could affect red squirrel, pine marten, badger and wildcat, if present and further surveys will be undertaken to determine if there are signs of use by these species prior to felling. Due to the small area of habitat type to be lost and likely low numbers of species as a result, even if present, the abundance of similar habitat in the surrounding area determines that losses are predicted to be not significant.

3.5.48 The Applicant's Biodiversity Net Gain strategy approach for No Net Loss on all projects ensures that biodiversity considerations must be embedded into all development. Compensatory planting is proposed and a biodiversity net gain report has been prepared.

3.5.49 A mitigation hierarchy is proposed to avoid harm to ecological features through careful site selection and to mitigate effects through embedded and additional mitigation to ensure there are no residual significant effects. Additional mitigation measures include avoiding breeding seasons where possible, or undertaking pre construction surveys / walkovers, habitat removal in smaller open areas undertaken in manner to allow any reptiles to move to other suitable habitat nearby, avoiding night time working / limiting lighting at night and ensure pre-construction black grouse surveys and EcoW surveys and management practises. Use of buffer zones to leks where present along access tracks and limiting speeds as appropriate. Where track widening is proposed, and leks are identified, activities should take place outside of grouse breeding season where possible or widening to be sited at least 300 m from lek sites.

3.5.50 Compensation for the permanent loss of habitat due to the development will be implemented through the SSE Transmission Biodiversity Net Gain metric, which will lead to the reinstatement of commercial forestry in the region of the temporary compound and also the addition of native wet woodland, native mixed scrub and shade-tolerant woodland meadow habitats. The native wet woodland habitats are proposed to surround the substation compound comprising appropriate species mix. Native scrub planting is proposed in two places to the north west and north east of the substation compound, neighbouring the northern parts of the proposed native wet woodland area.

3.5.51 Following the implementation of the embedded and additional mitigation measures proposed, there are no significant residual impacts on sensitive receptors predicted as a result of the Project. No cumulative residual effects are identified. The proposal is therefore consistent with LDP Policy 3 and associated SG Policy and a full assessment of both the baseline and the effects of the development on the subject site has been undertaken and any effects arising are fully addressed and compensated for via mitigation or through design and siting.

Forestry

3.5.52 The EA provides an appraisal of the forestry impacts which are likely to occur as a result of both construction and operation of the Proposed Development. It puts emphasis on the forest structure and management of the resource, and the likely level of impact that would arise based on an assessment of the sensitivity of the effects forestry areas. The assessment is based on the felling requirements associated with the red line boundary, Substation and Ancillary infrastructure, as well as the overhead line realignment and associated operational corridor (the Associated Works). The assessment also identified potential impacts on wider forestry management which may arise as a result of the Proposed Development but does not address the Long-Term Forest Plans of the wider area outwith the redline.

3.5.53 The loss of woodland as a result of the Proposed and Associated Developments equates to 0.018% of the commercial plantation resource. The loss of woodland required to facilitate the Proposed Development has been assessed as having a low magnitude of change based on the context of the regional resource and low sensitivity of the type of woodland present within the site boundary. In terms of mitigation for woodland loss, it has been deemed acceptable that woodland loss will be recovered through a compensatory planting scheme.

3.5.54 The felling of immature coniferous plantation required in order to facilitate the operational corridor for the Associated OHL Works for realignment has been assessed as low significance of effect and no other mitigation is recommended.

Hydrology, Hydrogeology and Geology

3.5.55 Chapter 6 of the EA Report presents a review of the potential impacts on the water environment and flood risk as a result of the Proposed Development. The ground and water environment as described includes hydrology, hydrogeology and geology receptors. A study area of 2km from the Proposed Development was identified to assess the potential effects on private water supply (PWS) and a wider study area of 10km to assess potential effects on the down stream water environment.

3.5.56 There are no statutory designations within the site, however statutory designations within 10km of the Proposed Development and their potential hydrological connectivity to the project are identified and assessed.

3.5.57 Six PWS are recorded within 2km of the Proposed Development. Further consultation is required to determine the source location and type. The EA contains further information within the Private Water Supply Risk assessment.

3.5.58 Identification of sensitive receptors and their likelihood of being affected by the Proposed Development are set out with sensitivity across all categories described as high.

- 3.5.59 The design of the Proposed Development has been progressed to reduce potential impacts as far as reasonably practicable including mitigation that is embedded into the design of the project in accordance with industry standard methods and procedures, which will reduce impacts from both construction and operation.
- 3.5.60 The mitigation measures relating to the hydrological environment embedded into the design and construction are:
- > 50m watercourse buffers for construction works with the exception of watercourse crossings along access tracks;
 - > Use of existing forestry tracks to minimise ground disturbance and requirements for water crossings;
 - > Location of transformers (containing oil) and diesel generators externally in secondary containment concrete bunds designed to accommodate a minimum of 110% of the volume of oil in the transformers to provide an allowance for rainfall.
 - > A WCEMP is provided within the EA Report Annexes and will form part of the embedded development design. Relevant sections of the Applicants General Environmental Management Plans (GEMPs) will inform a CEMP to be implemented by the Contractor post consent. GEMPs specific to hydrology and hydrogeology include:
 - > Private water supplies;
 - > Working in or near water;
 - > Soil management;
 - > Contaminated Land;
 - > Oil Storage and Refuelling;
 - > Bad Weather; and
 - > Working with concrete.
- 3.5.61 Construction work will be undertaken in accordance with good practice guidance as noted at paragraph 6.14 of the EA. A series of Pollution Prevention Guidelines (PPGs) and Guidance for Pollution Prevention (GPPs) are also identified which will be applied during construction and operation.
- 3.5.62 The assessment identifies that construction activities have the potential to cause effects on surface watercourses, groundwater and near surface water, soils and private and public water supplies. No significant effects are identified with mitigation.
- 3.5.63 In the operational phase the potential effects are considered to be increased run off rates and volume from hardstanding which can result in flood risk. Alterations to natural flow pathways from runoff from hardstanding areas, and the risk of chemical pollution events from minor spills from maintenance vehicles are also identified risks. With implementation of proposed good practise mitigation measures, no significant effects are identified.
- 3.5.64 An assessment of cumulative effects has also been considered for those developments within the same hydrological catchment. Three developments associated with the substation within the 10km wider Study Area are scoped in, however it is not considered that any residual cumulative effects of significance will arise after the application of good practise mitigation.
- 3.5.65 It is concluded that the residual effects of the Proposed Development would not result in significant effect on geology, hydrological or hydrogeological resources and as such the development is consistent with LDP Policy 3. No effects on peatland are identified such that

a peatland management plan would be required and as such the provisions of SG ENV11 can be set aside in this instance.

Noise Impact

- 3.5.66 Noise is addressed in Chapter 7 of the EA. It explains that substations contain various potential sources of environmental noise, the most significant of which are transformers and associated cooling equipment. The assessment examines the potential noise effects that could arise due to the Project at the closest Noise Sensitive Receptors (NSR).
- 3.5.67 The assessment results show that at the worst-case construction noise level the levels are below the lower threshold of 65dB day and 55 dB evening. The potential impact to nearest NSR is therefore negligible during these periods. Given the long distances from the Project to the NSR, construction vibration activities will not be perceptible.
- 3.5.68 An assessment of noise emissions from the proposed substation has been undertaken based on specification and assumed library emission data and computer-based modelling. The assessment indicates that there would be no adverse impact on nearby receptors. It is not anticipated that there will be any cumulative impacts in terms of noise and vibration arising from construction or operation. During construction, the cumulative worst case traffic movements for a period of three months, is lower than an increase of 25% on baseline traffic data on the A83. During the operational phase, no increases in traffic volume are predicted which would be cumulative with the impacts from other developments. The noise impact, based on the potential traffic noise changes is therefore assessed as negligible also.
- 3.5.69 Given the findings of the noise assessment, not specific mitigation measures are required, above those which are embedded into the Proposed Development design, siting and layout. It is however recommended that impact is reassessed by acoustic consultants as manufacturers data becomes available.
- 3.5.70 The assessments have been completed based on guidance providing in relevant planning policy and guidance and to BS4142 and BS8233 as applicable, along with advice and guidance contained within the LDP and from ABC officers. There are no issues arising pertaining to noise or vibration that suggest the proposals would be contrary to the LDP or other planning policy in this regard.

Traffic and Transport

- 3.5.71 Chapter 9 of the EA Report examines the traffic and transport effects arising from the construction and operation of the Proposed Development and concludes that, with the implementation of proposed mitigation, there would be no significant effect. To this end the proposals are consistent with LDP policy 3 and LDP STRAT 1 which seeks to ensure the delivery of proposed development is sustainable and does not exert significant adverse effect on the environment or amenity of communities. LDP11 is also relevant whereby it is important to demonstrate that development is located in the right place such that its effects, including on the road network and associated amenity, are not detrimental.
- 3.5.72 SG LDP TRAN 5 requires that where proposals will significantly increase vehicular traffic on substandard public roads, developments will be required to contribute proportionately to required upgrades. No requirements for such works have been identified to date, but should this arise, the Applicant would agree with ABC the extent of necessary works and consents prior to commencement of development. A Construction Traffic Management Plan (CTMP) will be progressed by the Contractors with ABC and Transport Scotland (where appropriate) identifying routes for construction traffic and will adopt appropriate mitigation including appropriate traffic management arrangements, safe routes, approved access routes, timing and procedure for abnormal loads, signage and good practices surrounding dust and dirt potential to carriageways.

- 3.5.73 The majority of construction vehicles are proposed to access the Project via the A83 onto a forestry road utilising the access to the existing Crarae Substation. New permanent access track will be formed from this forester track to enable access for vehicles during construction and for ongoing operational maintenance. A worst-case scenario of vehicle movements per day at the peak construction period has been assessed and no significant adverse effects, after mitigation are predicted. A cumulative assessment has also been undertaken which considers other projects in the wider area which may be in construction at the same time, and includes the associated substation works at Craig Murrail. Again, after mitigation no significant adverse effects are predicted.
- 3.5.74 Key mitigation measures are included within the CTMP to be prepared for the construction period as detailed above this is wholly consistent with best practise and SG LDP TRAN 5. In the operational phase, the Proposed Development will be unmanned with only maintenance / equipment check visits undertaken when required. No significant transport or traffic effects are predicted from operation.
- 3.5.75 The overall effect of the Proposed Development in terms of traffic and transportation effects, after mitigation are assessed as minor or less.

3.6 Development Plan Conclusion

- 3.6.1 The proposals represent nationally important improvement to the transmission network infrastructure in this part of Scotland. The likely environmental impacts arising from the development have been fully assessed and no significant effects are identified that cannot be satisfactorily mitigated to appropriate levels. The proposals will deliver further HV electricity infrastructure features into the countryside and landscape where such features already exist in a sensitive manner. The siting and design of the Proposed Development ensures minimal disruption and visual or landscape intrusion. Appropriate access for construction and maintenance has been designed to minimise impact on the amenity of the community and wider transport network.
- 3.6.2 The need for the development is driven by the increased infrastructure capacity to meet the committed renewables' connection requirement. Furthermore, there is a requirement to secure safe and efficient supply of energy to customers and to meet net-zero targets nationally.
- 3.6.3 Based on the above appraisal, there are no significant effects arising from the Proposal. The design approach is well considered and provides for an appropriate extension of well-established infrastructure. It is considered the Proposed Development is acceptable and accords with Development Plan Policies as set out at Section 3.2 and represents sustainable development in as much as it delivers an element of the long term transmission infrastructure required to address the climate emergency through the transmission of renewable energy, which in turn would provide greater security of supply to local communities, in a manner which is environmentally sensitive and is the right development in the right location.

4. Do Material Considerations Indicate Otherwise?

4.1 Introduction

4.1.1 Having established that the Proposed Development would be consistent with the Development Plan, it is necessary to consider the following:

- > Are there material considerations that determine a decision should be made contrary to the Development Plan?
- > Do the relevant material matters further support the position that the Proposed Development should be approved?

4.2 Local Guidance

4.2.1 In addition to the statutory LDP and associated SG, the Council has published the Argyll and Bute Renewable Energy Action Plan (2017) to assist in realising its vision for the development of the renewable energy sector in their area. The Council recognises the important role it has to play in responding to the Climate Emergency due to the area's unique mix of indigenous renewable resources. The Council aims to maximise the opportunities for sustainable economic growth which will benefit their communities and Scotland as a whole.

4.2.2 Consideration of grid infrastructure is central to this Action Plan and this is also noted within SG 2 Renewable Energy. Specifically, Ref TC1 of the Action plan references a need to:

“Ensure the grid is fit for purpose to meet renewable energy opportunities – Inveraray-Crossaig overhead line replacement, Northern Argyll substation, overhead line to Taynuilt and submarine cable replacement programme”.

4.2.3 It is recognised therein that support for these essential grid improvements is provided within the Council to enable renewable energy generation throughout the area, and whilst the support does not automatically make development acceptable, there is recognition that delivery is difficult without some localised impacts. The management of these impacts in terms of mitigation and siting to ensure that significant environmental and landscape impacts are minimised and carefully considered is promoted and will be assessed within the overall balanced assessment of proposal of this nature.

4.3 National Planning Policy

National Planning Framework 3

4.3.1 National Planning Framework 3 (2014) (NPF3) is a long-term strategy for Scotland. It is the spatial expression of the Scottish Government's Economic Strategy, and of plans for development and investment in infrastructure.

4.3.2 Part of the vision is of Scotland as a low carbon place, where the opportunities arising from the ambition to be world leader in low carbon energy generation have been seized. NPF3 is informed by, and aims to help achieve, the Scottish Government's climate change and renewable energy targets.

4.3.3 NPF3 acknowledged that the energy sector accounts for a significant share of the country's greenhouse gas emissions, and that addressing this required capitalising on Scotland's outstanding natural advantages, including its significant wind resource.

4.3.4 To secure and capitalise on the gains to be found in the renewable sector and to enable a diversifying energy supply NPF3 supports the maintenance and enhancement of the electricity grid network. Paragraph 3.28 states that:

“Electricity grid enhancements will facilitate increased renewable electricity generation across Scotland. An updated national development focusing on enhancing the high voltage transmission network supports this and will help to facilitate offshore renewable energy developments”.

4.3.5 NPF3 therefore identifies 14 national developments that are needed to help to deliver the Scottish Government’s spatial strategy. High Voltage Electricity Transmission Network is a core category.

4.3.6 A fundamental planning policy matter is that the Proposed Development is identified within **Annex A of NPF3, as National Development**, under the class of development described as “new and / or upgraded onshore substations directly linked to electricity transmission cabling of or in excess of 132 kilovolts”.

Figure 4.1: Extract of Statement of Need from NPF3

4. STATEMENT OF NEED AND DESCRIPTION – High Voltage Electricity Transmission Network

1 – Location: Throughout Scotland.

2 – Description of Classes of Development: Development consisting of:

- a. new and/or upgraded onshore electricity transmission cabling of or in excess of 132 kilovolts, and supporting pylons.
- b. new and/or upgraded onshore sub stations directly linked to electricity transmission cabling of or in excess of 132 kilovolts.
- c. new and/or upgraded onshore converter stations directly linked to onshore and/or offshore electricity transmission cable(s) of or in excess of 132 kilovolts.
- d. new and/or upgraded offshore electricity transmission cabling of or exceeding 132 kilovolts.

3 – Designation: A development within one or more of the Classes of Development described in paragraph (2) (a) to (d) is designated a national development.

4 – Need: These classes of development are needed to support the delivery of an enhanced high voltage electricity transmission grid which is vital in meeting national targets for electricity generation, statutory climate change targets, and security of energy supplies.

4.3.7 The proposed Crarae substation will form a key node on the GB electricity transmission network. The new 275kV OHL and substation enabling electricity to be converted between voltages (within this substation) allowing the efficient onward transmission of power across the GB Transmission system to meet both generation and demand requirements.

4.3.8 Argyll and Bute is an important strategic location where the capture of renewable energy from the natural resources of the area is supported and promoted within both national and local policy. The area has seen a sustained increase in renewable energy generation which has resulted in a need to increase capacity and upgrade existing infrastructure beyond its existing rating.

4.3.9 The Proposed Development is therefore a critical transmission investment for the area and comprises new infrastructure to support the existing and planned transmission network. It will also enable improved security of supply and deliver enhanced capacity to support existing and facilitate future demand for new connections.

- 4.3.10 The need for the development is further supported in the context of the emerging NPF4 and the latest Government policy statements regarding strengthening grid infrastructure to deliver net zero.

The Fourth National Planning Framework ‘Scotland 2045’ Consultative Draft (2021)

- 4.3.11 Scotland’s Fourth National Planning Framework Consultative Draft (draft NPF4) was published in November 2021. It continues the status of electricity transmission infrastructure as having national development status in the Hierarchy of Developments in the planning system. 18 National Developments are proposed to support the delivery of the Government’s new Spatial Strategy including ‘National Development’ No.12 entitled ‘Strategic Renewable Electricity Generation and Transmission Infrastructure’.
- 4.3.12 Although the NPF4 document is in draft form, it is considered that it should attract some but limited weight at this time as a material consideration in support of the Proposed Development. NPF4 will form part of the approved Development Plan once adopted.
- 4.3.13 Page 44 of the draft addresses national developments and sets out that this designation means *“that the principle of the development has no need to be agreed in later consenting processes, providing more certainty for communities, business and investors”*.
- 4.3.14 This specific National Development is addressed in some detail at page 59 of the draft NPF4 where it states that it supports expansion of the electricity grid. It sets out that:
- “The electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect and transmit the output from new on and offshore capacity to consumers in Scotland, the rest of the UK and beyond. Delivery of this national development will be informed by market, policy and regulatory developments and decisions.”*
- 4.3.15 In terms of ‘need’, the draft sets out the following:
- “Additional electricity generation from renewables and electricity transmission capacity of scale is fundamental to achieving a net zero economy and supports improved network resilience in rural and island areas.”*
- 4.3.16 In terms of designation of development designated as National Development this includes:
- “new and/or upgraded infrastructure directly supporting high voltage electricity lines and interconnectors including converter stations, switching stations and substations.”*
- 4.3.17 Furthermore, in terms of draft national planning policy, set out at page 69 in the draft NPF is draft Policy 2 entitled ‘Climate Emergency’. It states that when considering all development proposals “significant weight should be given to the global climate emergency”.

Scottish Planning Policy

- 4.3.18 Scottish Planning Policy (2014) (SPP) is Scottish Government policy on how nationally important land use planning matters should be addressed.
- 4.3.19 SPP contains a number of principal policies, one of which expresses *“a presumption in favour of development that contributes to sustainable development”*. Paragraph 28 states that:
- “the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost”*.
- 4.3.20 Paragraph 29 highlights a series of criteria which should guide decision-making in this regard and the following provisions are considered relevant to the Proposed Development:
- > Net economic benefit;

- > Economic issues, challenges and opportunities;
- > Good design and qualities of successful places;
- > Delivery of infrastructure;
- > Climate change mitigation and adaptation;
- > Principles of sustainable land use as set out in the land use strategy;
- > Protecting, enhancing and promoting cultural heritage;
- > Protecting, enhancing and promoting natural heritage and landscape;
- > Reducing waste; and
- > Over-development, amenity and effects on water, soil and air.

4.3.21 SPP sets out at paragraph 154 that to support in achieving the outcome of making Scotland a low carbon place, the planning system should support the change to a low carbon economy, including deriving the equivalent of 100% of electricity demand from renewable sources by 2020. It should support the development of electricity generation from a diverse range of renewable sources. It should guide development to appropriate locations and advise on the issues that should be taken into account when specific proposals are being assessed.

4.3.22 More generally, SPP advises that the siting and design of development should take account of local landscape character. Decisions should take account of potential effects on landscapes and the natural and water environment, including cumulative effects. Applicants should seek to minimise adverse impacts through careful planning and design. Planning permission should be refused where the nature or scale of a development would have an unacceptable impact on the natural environment.

4.3.23 The Proposed Development would be consistent with the principles set out at paragraph 29 of SPP and it would also assist in delivering SPP Outcomes in particular Outcomes 1 and 2 (namely a successful sustainable and low carbon place) – indicating that overall the proposal is sustainable development. The strategic location adjacent to existing and enabling the optimal routing of proposed OHLs, taking into account environmental effects and conditions provides that it is “*the right development in the right place*”.

4.3.24 As noted, SPP is under review and the new NPF4 will become the single national planning policy document, replacing both NPF3 and SPP and it will have Development Plan status when it comes into force. Should NPF4 be adopted in the process of the determination SPP will cease to be relevant.

4.4 The statutory Purpose of Planning

4.4.1 Section 1 of the Planning (Scotland) Act 2019 amended the 1997 Act to include a ‘purpose of planning’. The purpose of planning is now set out in Section 3ZA of the 1997 Act and is described as follows:

“(1) *The purpose of planning is to manage the development and use of land in the long term public interest.*

(2) *Without limiting the generality of subsection (1), anything which—*

(a) *contributes to sustainable development, or*

(b) *achieves the national outcomes (within the meaning of Part 1 of the Community Empowerment (Scotland) Act 2015),*

is to be considered as being in the long term public interest.” (underlining added added)

- 4.4.2 This emphasises that Planning Authorities and the Scottish Ministers, in their decision-making, should be taking a view on development and use of land over the long term and in particular with the public interest in mind. Section 3ZA(2) specifically references that anything which contributes to sustainable development shall be considered as being in the long term public interest. As assessed above, the Proposed Development can be considered to contribute towards sustainable development. The proposal will make a valuable contribution to the long-term public interest in combatting climate change and addressing the Climate Emergency.
- 4.4.3 Section 3(A)(3)(c) requires the NPF to state how development will contribute to each of the outcomes in Section 3(A) (these are the national outcomes referred to in Section 3(Z)(A)).
- 4.4.4 Under Section 3A(e) of the 1997 Act, one of these outcomes is “*meeting any targets relating to the reduction of emissions of greenhouse gases...*” Therefore, the target has been set for the policies in emerging NPF4 to provide for development that contributes to the push towards net zero.
- 4.4.5 It is clear from the amendments to the 1997 Act by the Planning (Scotland) Act 2019 that the long-term public interest will be key and underpin the preparation of NPF4. Sustainability and meeting net zero/greenhouse gas emission reduction targets will be pivotal in serving that long term public interest and this has been provided for with statutory recognition.
- 4.4.6 It is also clear that achieving net zero underpins emerging NPF4 and this key matter ‘ties in’ to the various other energy policy material considerations referred to in this statement. Planning policy therefore needs to adapt to properly address these other considerations. In short, planning policy needs to align with the law on net zero and it is almost certain to do so through NPF4.

4.5 Energy Policy & Targets

- 4.5.1 Government renewable energy policy and associated renewable energy and electricity targets and the need for a ‘green recovery’ from the Covid-19 pandemic are considerations of the highest importance. It is important to be clear on the current position as it is a fast-moving topic of public policy.
- 4.5.2 The urgent need for electricity transmission to enable an increase of renewable energy technology and generation is supported through a number national planning and energy policy documents and these are material considerations in land use planning terms because they LDP pre-dates the fast moving policy changes and the climate emergency is a primary national consideration.

The UK Energy White Paper

- 4.5.3 The UK Government Energy White Paper ‘Powering our Net Zero Future’ (December 2020) sets out that: “*electricity is a key enabler for the transition away from fossil fuels and decarbonising the economy cost-effectively by 2050*”.
- 4.5.4 It adds a key objective is to “*accelerate the deployment of clean electricity generation through the 2020s*” (page 38). Electricity demand is forecast to double out to 2050, which will “*require a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our net zero target*” (page 42).
- 4.5.5 In terms of electricity policy in the White Paper, the UK Government clearly recognise that the scale of change that is required to respond to climate change is at a pivotal point. The anticipation is that there is going to need to be a global green industrial revolution and it is only through this that an appropriate response would be made to tackling climate change issues. Chapter 1 of the White Paper sets out this context and makes clear the likely change in the nature and volume of electricity generation. It recognises the very significant role that renewable electricity generation will play in relation to delivering total energy usage. This means it will have to play a much greater role in decarbonising both transport and heat.

The Climate Emergency

- 4.5.6 The UK Government is legally committed to the delivery of a reduction in emissions to 'net zero' by 2050. The Scottish Government has committed to achieve net zero by 2045, some five years earlier.
- 4.5.7 A critical part of the response to the challenge of climate change was the Climate Emergency which was declared in Scotland in April 2019. The declaration of climate emergency needs to be viewed in the context in which it was declared (advice from the Committee on Climate Change (CCC) and in response to UK commitments under the Paris Agreement and what followed from it as a result of the declaration (new emissions reduction law).
- 4.5.8 The key issue in relation to these statements is that they acknowledge the very pressing need to achieve radical change and that by 2030 it will be too late to limit global warming to 1.5 degrees. The Scottish Government therefore acted on the Climate Emergency in 2019 by bringing in legislation and increasing the Interim emission reduction target to 75% - a higher figure than recommended by the CCC. The new targets were brought into force by way of Commencement Regulations on 23 March 2020².
- 4.5.9 Furthermore, the declaration of the emergency is not simply a political declaration, it is now the key priority of Government at all levels. Indeed, defining the issue as an emergency is a reflection of both the seriousness of climate change and its potential effects and the need for urgent action to cut carbon dioxide and other greenhouse gas emissions.
- 4.5.10 It means action now, not in years to come. The new emissions reduction legislation was brought in (enacted) in 2019 and brought into force by Regulations in March 2020 – it did not wait for planning policy to be updated.
- 4.5.11 The scale of the challenge presented by the new targets for net zero within the timescale adopted by the Scottish Government on the advice of the CCC is considerable, especially given the requirements for decarbonisation of heat and transport – this will require very substantial increases in renewable electricity generation by 2030.

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

- 4.5.12 When it was enacted, the Climate Change (Scotland) Act 2009 set world leading greenhouse gas emissions reduction targets, including a target to reduce emissions by 80% by 2050 – which is reflected in the current SPP. However, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 which amends the 2009 Act sets even more ambitious targets – which reflect the recommendations of the CCC for a net zero greenhouse gas emissions target by 2045 at the latest, with challenging interim stages – a 75% reduction target by 2030 and 90% by 2040.
- 4.5.13 There are two key observations which arise from the changes in targets. The first is that the 2019 Act has significantly increased the target required to be met by 2030. Indeed, when the matter was proceeding through Parliament, it was the Scottish Parliament that increased the requirement from a 70 to 75% reduction by 2030. This acts upon the declarations of the climate change emergency and recognises the urgent response that is required.
- 4.5.14 In addition to that particular matter, the legislation also introduced annual targets. These annual targets clearly illustrate the speed of change that is required essentially prior to 2030. The targets show (see **Table 4.1** below) that up to 2020 the annual percentage reduction that was required was 1% but this then increases each year from 2020 to 2030. It increases to 1.9% for each year between 2020 and 2030. This is the level of change that is required to achieve the 2030 target and represents a near doubling of the response.

² The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (Commencement) Regulations 2020.

- 4.5.15 The Scottish Government publishes an annual report³ that sets out whether each annual emissions reduction target has been met. The report for the 2019 target year was published in June 2021. The Report states that the Greenhouse Gas Account reduced by only 51.5% between the baseline period and 2019. As noted, the 2019 Act specifies a 55% reduction over the same period – therefore the targets for 2018 and 2019 were not met.
- 4.5.16 The Scottish Greenhouse Gas Statistics for 2020 were released in June 2022. These show that the GHG account reduced by some 58.7% between the baseline period and 2020. However according to the report⁴, the drop in emissions between 2019 and 2020 was mainly down to lower emissions from domestic transport, international flights and shipping and energy supply. All other sectors demonstrated modest reductions over this period, except the housing sector.
- 4.5.17 Coronavirus restrictions were responsible for the large drop in emissions from transport, while residential emissions increased by 0.1 MtCO₂e as more people worked from home during the pandemic. The Scottish Net Zero Secretary Michael Mathewson stated in June 2022 on the release of the latest statistics:
- “Nonetheless, the most significant changes are in the transport sector and are associated with the temporary measures taken in response to the Covid-19 pandemic. We must be prepared for these figures to substantially rebound in 2021. There can be no satisfaction taken in emissions reductions resulting from the health, economic and social harms of the pandemic.”* (emphasis added)
- 4.5.18 This demonstrates the scale of change required over the next decade to achieve the 2030 target. This also means the trajectory, in terms of the scale and pace of action to reduce carbon dioxide emissions, is steeper than before and the 2020s is a critical decade.
- 4.5.19 **Delivering the necessary transmission infrastructure in Scotland will be critical to enabling the necessary increases in renewable capacity to enable the considerable increase in renewable electricity use which is forecast.**

Table 4.1: Scotland’s Annual Emission Reduction Targets to Net Zero

Year	% Reduction target	Actual Emissions Reduction %	Year	% Reduction Target
2018	54	50	2032	78
2019	55	51.5	2033	79.5
2020	56	Interim Target 58.7	2034	81
2021	57.9	-	2035	82.5
2022	59.8	-	2036	84
2023	61.7	-	2037	85.5
2024	63.6	-	2038	87
2025	65.5	-	2039	88.5
2026	67.4	-	2040	90 (Interim)
2027	69.3	-	2041	92

³ Scottish Government, Official Statistics, Scottish Greenhouse Gas Statistics 2019, (June 2021).

⁴ Scottish Government. Official Statistics, Scottish Greenhouse Gas Statistics 2020, (June 2022).

2028	71.2	-	2042	94
2029	73.1	-	2043	96
2030	75	Interim Target	2044	98
2031	76.5	-	2045	100% Net Zero

The Update to the Climate Change Plan (2018-2032) (December 2020)

4.5.20 The Scottish Government published the update to the Climate Change Plan (CCP) ‘Securing a Green Recovery on a Path to Net Zero’ on 16 December 2020. The plan covers the period 2018-2032 and responds to the new net zero targets aimed at ending Scotland’s contribution to climate change by 2045. The period it covers refers to the timescale in which the Government has committed to reduce greenhouse gas emissions by 75% by 2030 (compared with 1990 levels).

4.5.21 A key part of the plan is the green recovery, and it states (page 1) that:

“It is essential that a recovery from the pandemic responds to the climate emergency and puts us on a pathway to deliver our statutory climate change targets and a just transition to net zero, by ensuring our actions in the immediate term are in line with our long-term goals”.

“The Scottish Government has been clear in its commitment to securing a just and green recovery, which prioritises economic, social and environmental well-being, and responds to the twin challenges of the climate emergency and biodiversity loss”.

4.5.22 In terms of electricity, the CCP update announces, *“further policies to continue the rapid growth in renewable generation over the past 20 years, moving from a low to a zero-carbon electricity system”.*

4.5.23 Page 18 refers to the *“pathway to 2032”* and sets out what the policies mean in practice. It states:

“our electricity system will have deepened its transformation for the better, with over 100% of Scotland’s electricity demand being met by renewable sources. More and more households, vehicles, businesses and industrial processes will be powered by renewable electricity, combined with green hydrogen production. There will also be a substantial increase in renewable generation, particularly through new offshore and on shore wind capacity” (page 18).

4.5.24 Chapter 1 addresses electricity. Paragraph 3.1.4 recognises that as Scotland transitions to net zero, a growing and increasingly decarbonised electricity sector *“is critical to enabling other parts of our economy to decarbonise – notably transport, buildings and industry”.*

4.5.25 Annex A of the CCP contains policies and proposals. For the electricity sector, ‘outcome 1’ is that *“the electricity system will be powered by a high penetration of renewables, aided by a range of flexible and responsive technologies”.*

4.5.26 In terms of the coordinated approach needed, Section 2.5 refers to the planning system and the forthcoming NPF4. Planning is seen as a *“key delivery mechanism for many of the policies within this climate change plan update, across all sectors”.*

4.5.27 Key points from the Climate Change Plan Update include:

- > Government views it as essential that a recovery from the pandemic responds to the climate emergency and puts Scotland on a pathway to deliver statutory climate change targets and a transition to net zero (page 1).

- > A growing and increasingly decarbonised electricity sector is seen as critical to enabling other parts of the economy to decarbonise, particularly transport, buildings and industry (page 32).
- > The need to invest in renewable generation and related infrastructure to reduce greenhouse gas emissions is critical to creating good, green jobs as part of the green recovery and longer-term energy transition (page 78).
- > Renewable generation is expected to increase substantially between now and 2032 with an expectation of development of between 11 and 16 Giga Watts (GW) of new capacity during this period, “helping to decarbonise our transport and heating energy demand” (page 40).
- > Electricity demand is expected to have grown considerably over this period (page 82).

Scottish Government & Scottish Green Party: Shared Policy Programme

4.5.28

The Scottish Government and the Scottish Green Party agreed a formal Cooperation Agreement for the next five years of Government on 20 August 2021. A shared policy programme entitled ‘The Bute House Agreement’ was published on 20 August 2021 which sets out areas of mutual policy interest including energy and planning. This publication has been issued in advance of a formal ‘Programme for Government’. Key points of relevance from the document including the following.

- > In terms of energy, on page 12 of the document it is set out the parties:

“believe that the climate emergency means we need to use the limited powers we have to accelerate the decarbonisation of our energy system. While electricity has already been largely decarbonised, our plans will see a significant increase in electricity demand for heating and transport. To accommodate this, we will support the continued and accelerated deployment of renewable energy”.

4.5.29

In order to do this the parties state that they will “*set an ambition to deliver, subject to consultation, between 8 and 12GW of additional installed onshore wind by 2030...- this will be supported by the changes in the planning system needed to permit the growth of this essential zero carbon sector*”.

4.5.30

Electricity transmission infrastructure is a critical element to enable delivery of this additional renewable energy capacity.

4.5.31

At the present time Scotland has approximately 8.4GW of installed onshore wind capacity. Therefore, the Government is looking to at the minimum, to double this capacity, by adding a minimum additional further 8-12GW in just less than ten years.

4.5.32

In terms of planning, the Agreement (page 17) states that the parties will *inter alia*:

“agree to ensure approval and adoption of Scotland’s Fourth National Planning Framework (NPF4) which will be vital in supporting the delivery of net zero by 2045 with significant progress by 2030;

actively enable renewable energy.... supporting repowering of existing windfarms and planning for the expansion of the grid”. (underlining added)

4.5.33

This further insight into the Government’s position further supports the strategic and nationally important need case for the proposed development. NPF3 and SPP provide strong support for renewables and energy infrastructure and it is clear that the support has intensified as time has passed and policy evolved.

The Programme for Government (2022)

- 4.5.34 The 'Programme for Government' 'a Stronger and More Resilient Scotland' was published in September 2022. It states that the climate emergency is becoming "more urgent" (page 4) and with reference to the current cost of living crisis, states "*our journey to net zero is not just part of the solution to this crisis: it is also critical to minimising the impending climate crisis, the impact of which will be even more significant than what we expect to see in the coming months*".
- 4.5.35 The Programme maintains the national focus on the transition to net zero and the significant economic opportunity it creates. The Programme therefore contains robust recommendations relating to achieving Net Zero and reducing greenhouse gas emissions.

Energy Policy Conclusions

- 4.5.36 Overall, the energy policy framework is a very important material consideration and one that should attract great weight in the balance of factors in the determination of the planning application. It also needs to be acknowledged that the need case with regard to renewable generation and electricity infrastructure as set out in NPF3 and SPP was predicated on emissions reduction targets that are now superseded by more challenging targets, to be achieved sooner. The documents are under review and the targets referred to in them have to a large extent been overtaken by new statutory greenhouse gas emission reduction targets.
- 4.5.37 The function and benefits of the Proposed Development should be seen in the context of the current Climate Emergency– the infrastructure would help address the issue of global heating and very challenging 'net zero' targets and moreover, would deliver economic benefits at a time of economic recovery.
- 4.5.38 It is considered that the energy benefits from this proposed infrastructure development, outweigh the local impacts of the development which have been satisfactorily mitigated by way of a carefully considered siting and design approach.
- 4.5.39 Moreover, the economic benefits that would result are also now of particular importance. The letter from the Chief Planner dated 03 April 2020 entitled 'Planning Procedures and COVID-19' is clear in stating that "*planning has a crucial part to play within and beyond the immediate emergency*" and makes reference to the planning system's critical role in "*future economic and societal recovery*".

5. Conclusions

5.1 Conclusions

- 5.1.1 The answers to the key questions posed are:
- > The Proposed Development is consistent with the relevant policies of the Development Plan and with the plan when read as a whole.
 - > The relevant material considerations further support the position that the Proposed Development should be granted planning permission.
- 5.1.2 The Proposed Development has been demonstrated to be consistent with the Development Plan, associated local guidance, and national planning and energy policy.
- 5.1.3 The proposed development is required to strengthen the existing Transmission system and facilitate connection of further low carbon generation, satisfying obligations to deliver an economic, efficient and coordinated Transmission system for net zero.
- 5.1.4 The development has been sensitively sited and designed to minimise visual impact with appropriately designed buildings and equipment enclosures such that visual and noise concerns have been mitigated satisfactorily. The proposal has been sited and designed in such a way that it can confidently be regarded as “*the right development in the right place*” in the context of SPP.
- 5.1.5 There are no significant adverse effects, post mitigation, associated with the construction or operation of the Proposed and Associated Development within the EA.
- 5.1.6 The development is a strategically important national Transmission site essential to capture the energy production of renewable energy generators in the Argyll & Bute area and to reinforce existing critical transmission infrastructure to serve the immediate and wider area and this is consistent with Policies STRAT 1, LDP DM1. The reinforcement and extension of infrastructure to facilitate this, as well as ensuring security of existing supply is an important material consideration.
- 5.1.7 Furthermore, in terms of planning policy provisions set out in NPF3 and SPP, there is now a clear shift from what was then (in 2014) termed the move to a ‘low carbon economy’ – there is now an ambitious policy imperative underpinned by statute to move to a ‘net zero economy and society’. The proposed development can help achieve that clear policy objective and help to fulfil the clear statutory outcomes set in the draft NPF4. It must follow from the above that the need case is to be accorded great weight in the planning balance. The policy imperative must be acted on. The way that decision makers can do that is by properly recognising the seriousness and importance of energy policy related considerations in the planning balance.
- 5.1.8 In terms of the draft NPF4, the Applicant is not relying on future policy changes to make its case. The Applicant has been quite clear in saying that the Proposed Development should obtain consent as matters stand in the context of NPF3 and SPP, irrespective of any additional policy support which is likely to be forthcoming. However, it is highly likely that when NPF4 is approved, the planning balance will swing even further in favour of consent being granted.
- 5.1.9 It is the cumulative effect of a large number of individual electricity infrastructure projects which will have a significant impact in moving Scotland to where it needs to be in the context of attaining net zero. The benefits that would result would make a valuable contribution to the Government’s clear aspiration for an accelerated and greater deployment of renewable energy and increased security of supply.

- 5.1.10 The delivery of this infrastructure will substantially assist in facilitating existing and future transmission of energy across the country to help delivery of the net zero policy imperative.
- 5.1.11 It is therefore concluded that the Proposed Development is consistent with the Development Plan and that there are material considerations of local and national importance which further support the delivery of this key development within the electricity transmission network which will support and deliver the net zero agenda.

Contact

David Bell Planning Ltd
26 Alva Street
Edinburgh
EH2 4PY

dbplanning.co.uk

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