



Craig Murrail, Argyll Proposed 275 kV Substation

Planning Statement

November 2022

Contents

1.	Introduction & Overview	3
1.1	Background	3
1.2	Approach	3
1.3	Key Facts	4
1.4	Structure of this Planning Statement	4
2.	The Site, Proposed Development & Design Approach	5
2.1	Site Location & Description	5
2.2	Site Selection and Planning History	5
2.3	The Proposed Development	6
2.4	Associated Development	7
2.5	Design Approach	8
3.	Is the Development in accordance with the Development Plan?	9
3.1	The Development Plan	9
3.2	Key LDP Policy Provisions	9
3.3	Other Policies	12
3.4	LDP2 – Proposed Plan	14
3.5	Policy Appraisal	15
3.6	Development Plan Conclusion	23
4.	Do Material Considerations Indicate Otherwise?	25
4.1	Introduction	25
4.2	Local Guidance	25
4.3	National Planning Policy	25
4.4	The statutory Purpose of Planning	28
4.5	Energy Policy & Targets	29
5.	Conclusions	35
5.1	Conclusions	35

1. Introduction & Overview

1.1 Background

- 1.1.1 Scottish Hydro Electric Transmission plc ('the Applicant'), who, operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission) has submitted a national 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 proposal forms part of a wider project which includes an overhead line (OHL) tie-in with two temporary towers and associated access tracks (the 'Associated Development') to connect the substation to the transmission network which will be progressed via an application under Section 37 of the Electricity Act (hereafter referred to together as 'the Project').
- 1.1.3 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.
- 1.1.4 The Project will connect a new 275 kV substation to the recently constructed 275 kV Inveraray to Crossaig OHL. The development is required deliver a substation to current specification and standards to reflect the increased OHL capacity, whilst providing the necessary reinforcement to the existing network to support the continued generation of renewable energy and the wider electricity network in the region. 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.
- 1.1.5 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, along with an assessment of existing infrastructure capability demonstrated that the existing network required to be reinforced. As such, the Applicant is seeking to deliver a network reinforcement in order to maintain compliance with the standards required as the network operator and to deliver provision for increased capacity to enable the existing and predicted new generation connections.
- 1.1.6 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 Craig Murrail 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 and screening** 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 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 2.5 kilometres (km) north east of Lochgilphead and 2.9 km south west of Loch Glashan. The Proposed Development site would be accessed from the A816 using an existing Forestry Land Scotland (FLS) track which will be extended via new permanent track to the Proposed Development site.
- 2.1.2 The redline boundary comprises the proposed substation development and additional land to accommodate the ancillary works along with the access. The proposed substation development is located within recently felled coniferous woodland, although some areas of forestry will remain within the wider site.
- 2.1.3 The site's topography is relatively flat siting approximately 110m Above Ordnance Datum (AOD) to the south, sloping upwards to the highest point of 120m AOD at the centre of the site, before gently returning to 130m AOD towards the north.
- 2.1.4 The site is located within recently felled coniferous woodland, however some areas of commercial plantation remain. The surrounding land comprises mixed and coniferous woodland plantations, with some areas also having been recently felled. The underlying soil at the site is currently classified as class 5 peat and does not support peatland habitats. The site lies approximately 200m south east of a tributary river (River Add) and approximately 2.9 km south west of Loch Glashan.
- 2.1.5 With the exception of ancient woodland which is located along the proposed access track to the site, there are no other statutory or non-statutory ecology or landscape designations within the site. Moine Major Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI) and Local Nature Conservation Sites (LNCS) are located 4km to the east. Lochgilphead LNCS is 2.5 km to the south and Knapdale National Scenic Area (NSA) is located approximately 1.8 km north west.
- 2.1.6 A Scheduled Monument (SM173) is located approximately 650m west of the substation platform.
- 2.1.7 The nearest residential property to the site is the dwelling known as Auchoish that is located approximately 1.27 km south west of the substation platform. Potential Scottish Water assets are known to existing near the Site entrance and along the access road to the south.

2.2 Site Selection and Planning History

- 2.2.1 A site selection process for the proposed new Craig Murrail substation considered five potential sites.
- 2.2.2 A site selection exercise was initially undertaken in 2015 with four sites originally identified. Following review and amendment to two preferred sites was made to create a fifth site option which became the 'Preferred Option' at that time. Further design work was undertaken however no site surveys were undertaken prior to the project being placed on hold until March 2016. Following reconsideration in 2016 the site was not progressed based on generation requirements at that time. Since then, requests for generation connections have increased substantially throughout the region and this, alongside the associated upgrades to the OHL network, have triggered the requirement for the new 275 kV substation at Craig Murrail.

2.2.3 The identified need commenced a re-examination of site options and these were consulted upon in July 2015. The preferred 2015 option remained the preferred site option on the basis of the least potential for environmental, technical and cost constraints. A more detailed analysis of the other site options and the reasons they perform less well and were not selected is contained in Section 2.4 of the EA that accompanies the application.

2.2.4 A 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 in order to connect a new 275 kV electricity substation to the recently constructed 275 kV Inveraray to Crossaig OHL network to current specification and standards whilst providing reinforcement to the existing network which will support the continued generation of renewable energy 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 approximately 2.93 ha at a height of 115 m AOD;
- > Gas insulated Switchgear (GIS) building, maximum height 22 m and single storey control building annex;
- > Two 275/33 kV grid transformers (GT), rated at 120 MVA each located in a ventilated building of maximum height 16 m;
- > 33kV Switchroom;
- > Two gantries and electrical equipment to connect the OHL and the proposed substation;
- > Three temporary works areas, one adjacent to the Proposed Development site of approximately 2.27 ha and two areas south west of the Proposed Development, adjacent to the existing access track of approximately 0.16 and 0.15 ha respectively, and temporary peat storage;
- > Diesel generator;
- > Borehole for water;
- > Turning and parking areas;
- > Use of existing forestry access track with some upgrades, approximately 5 km in length;
- > A permanent access track approximately 153m long connecting the proposed substation to the existing forestry track;
- > A permanent access track approximately 285m long providing access to the existing track to the north east of the site;
- > A 2.4 m high security fence of palisade construction around the substation platform perimeter;
- > Designation of the area around the substation site as bog/mire to provide biodiversity enhancement; and
- > Foul and surface water drainage (Sustainable Drainage System (SuDS) pond and outfall pipe).

In addition, tree felling and compensatory planting will be required.

- 2.3.3 Buildings will comprise steel portal frames with metal cladding and roof. There would be some un-housed electrical switchgear and plant located within the platform area.
- 2.3.4 The substation would not be illuminated at night for normal operation. Flood lights would be installed but would only be used in the event of a fault during the hours of darkness; or during the over-run of planning works; or when sensor activated as security lighting for night-time access.
- 2.3.5 Small scale alterations to the FLS access off the A816 may be required. Subject to survey, and to satisfy the requirements of ABC Roads Department, works 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/road strengthening to accommodate the long and heavy construction vehicles. It is proposed that where necessary conditions could be attached to control movements via a Traffic Management Plan (TMP) submitted post consent. Where necessary appropriate planning consents, and public road improvement consents will be secured prior to development.
- 2.3.6 A more detailed summary of the key elements of the proposal is provided within the EA.

Construction

- 2.3.7 A full description of the construction and access works programme is provided at section 2.6 of the EA. It is proposed that a Traffic Management Plan (TMP) will be prepared and agreed with Argyll & Bute Council (ABC) in advance of construction. This will include traffic management measures to ensure that the Project will not have an unacceptable impact on the public road network of nearby road users.
- 2.3.8 A Peat Management Plan will be prepared to manage potential impacts on peat.
- 2.3.9 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.

Forestry

- 2.3.10 The Project is located within a large commercial conifer plantation, the majority of which has been harvested and restocked with conifers and Norway spruce with pockets of Scots pine and Western hemlock. Further details are provided within the EA Chapter 5.

2.4 Associated Development

- 2.4.1 Components of the Associated Development subject to an application under Section 37 of the Electricity Act 1989, which are being assessed within the same EA for that application, and assessed cumulatively for the subject planning application include:
- > Construction of two new temporary steel lattice towers to support the temporary realignment of the existing overhead line during construction. Post construction the overhead line will be realigned to its existing alignment and connected into the new substation and the temporary towers will be removed;
 - > Two downleads from the realigned overhead line into the proposed substation and
 - > Two temporary access tracks leading from the proposed substation access track to the temporary towers.
- 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 operational will have restricted access for security and health and safety reasons, such that no public access will be allowed on site.

2.5.2 Alongside 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 accesses and hardstanding areas and minimise need for land take with regard to reducing potential disturbance on natural and human environment and reduce felling requirements.
- > 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.
- > Ensure the layout is carefully considered to minimise impact on peat and ensure reuse where possible.
- > Locate the substation built form outwith areas of deep peat.
- > Locating the substation a distance of up to 1km on either side of the recently constructed Inveraray to Crossaig 275 kV OHL.

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

3.1 The Development Plan

3.1.1 The statutory Development Plan covering the Proposed Development 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. There has been a delay in progressing the Plan due to the COVID 19 pandemic, 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 Argyll & Bute Council (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 however.

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 environmental assessments and there is no uncertainty in the findings of the assessments that conclude that there will be

any unacceptable impacts, and 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 the 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 that would facilitate necessary associated connection 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 no 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 no 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

ABLDP SG Policy	Policy Summary
	preservation and where appropriate planting of new, including compensatory planning and management agreements.
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 affecting an 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 it's 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

ABLDP SG Policy	Policy Summary
	with and adverse impact will not be permitted unless there are exceptional circumstances.
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 the main determining policies relevant to the principle of the development are:

- **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 previously 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 was highlighted to the Applicant within wider consultation on 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.
- 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’¹ 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 recently constructed Inveraray to Crossaig 275 kV OHL in order to capitalise on the OHL upgrade and increased capacity and facilitate renewable energy 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 offered less strategically viable locations in terms of construction, operation and maintenance.
- 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

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

electricity from renewable generation is therefore considered to be wholly consistent with this 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 Craig Murrail substation is required to increase capacity for connections to the SSEN Transmission network in the Argyll and Kintyre area. 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 the potential impact on the Knapdale National Scenic Area (NSA), 1.8km south east of the site, has been fully assessed. When compared to other site options the site was less visible and better screened than other options. Mitigation by siting and design has therefore been central to the development approach in order to minimise impact on the environment to an acceptable level.

- 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 outcome of this process has been that key areas of environmental effect have been fully assessed and appropriate mitigation has been included in the project design.

3.5.15 The EA submitted in support 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 Policy 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 visual impact 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, access and screening 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 considered carefully 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.

3.5.20 The Proposed Development is located in an area of commercial forestry approximately 2.5km north east of Lochgilphead. The lower lying landscape is associated within coastal areas and inland river valleys which comprise mixed use agriculture, parcels of broadleaved woodland and residential settlement.

3.5.21 The locality is sparsely settled with Lochgilphead and Ardrishaig representing the closest settlements to the Proposed Development Site. A series of roads and footways link the villages, hamlets and farm steadings scattered throughout other parts of the locality.

3.5.22 Existing electricity infrastructure within the Study Area comprising overhead power lines and an existing Substation at Port Ann, circa 5km to the south east. The recently constructed Inveraray to Crossaig 275 kV OHL is also present.

3.5.23 There are no landscape designations within the site. Within the wider Study Area, the Knapdale National Scenic Area (NSA) is located 1.1km to the north west. The West Loch Fyne Area of Panoramic Quality (APQ) is located 3.2km to the east. There are no other

landscape designations, or Gardens and Designed Landscapes (GDLs) within the Study Area.

- 3.5.24 The Proposed Development is located within the Plateau Moor and Forest Landscape Character Type (LCT) as defined within the National Landscape Character Assessment.
- 3.5.25 Visual receptors are limited with limited views likely from Lochgilphead 2.5km south west and a series of dispersed dwellings and farmsteads within 2km of the site, the nearest being Auchloish approximately 1.3km to the south west of the substation location.
- 3.5.26 A series of recreational receptors including Core paths, Lochgilphead Golf Club and a National Cycle Route are identified. Three main transport routes lie within the Study Area, the A816, B841 and A83.
- 3.5.27 The location of the Proposed Development has been chosen to avoid notable ridgelines, or visually prominent sections of skyline. The undulating landform in the locality in combination with extensive areas of forestry has been utilised in order to restrict views. The siting means that from higher summits in the wider surrounding areas the Proposed Development would typically have a backcloth provided by the distant landscape and would sit below the skyline. This mitigation by design is central to the approach to the Project by the Applicant. Further measures include woodland planting to provide further enhanced screening and biodiversity opportunity, utilisation of existing tracks, species-rich grassland ground cover to increase biodiversity value and soften the appearance of the Proposed Development and recessive colour and materials to be used on the transformer building to assist in grounding the infrastructure within the surrounding plantation forestry.
- 3.5.28 A detailed assessment of effects is provided within the supporting EA. In summary the Proposed Development would result in the permanent loss of localised forestry which represents an extremely small parcel of land within an expansive area of surrounding forestry that is already bisected by existing overhead power lines. This permanent loss would be subject to full compensatory planting elsewhere.
- 3.5.29 In terms of landscape effects, the location is such that effects would be primarily focused within 300m which accounts for a small part of the Plateau Moor and Forest LCT. The effects on the LCT would be limited. Negligible effects on surrounding landscape character areas and designations are predicted.
- 3.5.30 Visual effects would be extremely restricted based on the siting of the Proposed Development, and the visual containment resulting from surrounding forestry in combination with underlying landform. The Proposed Development would be predominantly screened from both settlements and the road network within the Study Area. The clearest views would be experienced from localised sections of Core Path C125 which runs along the Site boundary, along only a very short proportion of the route. The effects overall would be extremely limited.
- 3.5.31 Cumulatively the Proposed Development would augment the presence of existing power-related infrastructure in the locality. The containing effect of the surrounding tree cover would prevent the geographic spread of cumulative effects across wider parts of the landscape, and existing forestry would remain a defining characteristic of local landscape character. The Proposed Development would not notably contribute to cumulative effects on any landscape designation or upon the views experienced by any residents, recreational receptors or road users.
- 3.5.32 The Proposed Development is assessed as being well contained within the landscape with very limited and localised effects on landscape character and visual amenity. This is wholly consistent with LDP Policy SG ENV13 and 14, and consequently LDP 3 which encourage the use of siting and design to minimise effect and encourage mitigation such that any adverse effects are offset.

Cultural Heritage and Archaeology

- 3.5.33 The potential effects of the Proposed Development on Cultural Heritage receptors are provided in Chapter 6 of the EA. A 2km Study Area was considered for the appraisal.
- 3.5.34 There are no designated assets within the Proposed Development area. One Category C listed building is located within the 2km Study Area (Firgrove Lodge) and four scheduled monuments. Initial assessments of setting as a potential indirect impact were carried out for the Scheduled Monuments. The listed building derives its significance from architectural form and historic context and was not therefore considered.
- 3.5.35 A series of non-designated features are known within the Proposed Development and within 250m of the Proposed Development. One non-designated asset is identified within 50m of the proposed access track.
- 3.5.36 No previously unknown archaeological features were identified as a result of the archaeological walkover undertaken to inform the assessments.
- 3.5.37 The assessment determines that no direct impact to heritage assets will result from the Proposed Development.
- 3.5.38 As guided by National Planning Policies and planning guidance, mitigation is required in order to take account of the potential for archaeological remains within the site. Although potential for remains is considered low, a programme to mitigate the effects of any direct impacts is recommended as follows:
- > Proposed Substation Location – archaeological watching brief for all ground-breaking works.
 - > Wider Project Area and OHL – each OHL foundation will be subject to an archaeological watching brief.
 - > Access Roads – a demarcation of 20m from works activity is to be maintained around the known non-designated feature during ground-breaking activity.
- 3.5.39 In cultural heritage terms an indirect impact refers to any change in the baseline condition of a heritage asset resulting from a development beyond the boundaries of the asset. The majority of such impacts come from changes to the setting of heritage assets, as a consequence of new development. No significant impacts are identified.
- 3.5.40 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, alongwith SG ENV19 and 20 which provide further detail as regards Scheduled Monuments and Archaeological assets. The assessment and proposed mitigation approach is wholly consistent therefore with National and LDP policy and no significant adverse effects are identified.

Ecology

- 3.5.41 An appraisal of the potential effects on ecological features is provided in Chapter 4 of the EA. The appraisal examines the potential effects of construction and operation of the proposed substation alongside consideration of cumulative effects. Necessary mitigation is proposed and any residual effects remaining are assessed for their significance.
- 3.5.42 The general ecological context of the site can be described as rural commercial forestry and associated access roads / tracks. Some small watercourses and some broadleaved woodland are also present. A number of areas of conifer plantation have been recently felled

to allow for construction of the Inveraray to Crossaig 275kV OHL. Other areas of plantation have been felled a number of years ago and not replanted.

- 3.5.43 No sites designated for their national conservation importance lie within the Proposed Development area. Nine sites lie within 10km of the site, the nearest designated sites are Moine Mhor Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) which are located 1.5km west (at their nearest point) of the main access road to the Proposed Development.
- 3.5.44 Four areas of Ancient Woodland lie adjacent to the existing access track for a total of approximately 0.8 km. There is the possibility that works made need to be undertaken to expand the access track which could result in the requirement to remove 0.03 ha of the Ancient Woodland that lies adjacent to the existing access track. The Ancient Woodland is currently fragmented by the existing access track. If these works are necessary this would be 0.2% of the overall woodland removed, which would result in a minor impact of significance.
- 3.5.45 An Extended Phase1 Habitat Survey and initial European Protected Species survey was undertaken in October 2021. A National Vegetations Classification (NVC) survey was also carried out where habitats with the potential to be groundwater dependent terrestrial ecosystems (GWDTE) were noted.
- 3.5.46 As agreed with NatureScot through consultation, reliance upon the ornithological baseline agreed for the Inveraray to Crossaig OHL Reinforcement Project has been accepted and no additional bird surveys were deemed necessary.
- 3.5.47 The surveys undertaken are consistent with the provision of ENV and SG LDP ENV1 which seek that Applicants establish effects and impacts, and design appropriate mitigation such that significant adverse effects are identified.
- 3.5.48 Due to the type of development, there is considered to be little or no effects on habitats and species in the site or surrounding area during operation. The assessment of impact and effect has therefore focused largely on construction.
- 3.5.49 No sites designated for nature conservation importance or woodlands listed on the Ancient Woodland Inventory will be affected by the proposals except the potential requirement to remove 0.03ha of Ancient Woodland as detailed in paragraph 3.5.44 above.
- 3.5.50 The Proposed Development will result in the loss of some habitats as a result of proposed temporary towers proposed to allow a temporary diversion of the OHL, construction of the substation and associated existing and new access tracks, and also due to the temporary works area. These are detailed in **Chapters 4 and 5**.
- 3.5.51 Mitigation has been achieved largely via the project design approach seeking to locate the development in habitat of less value to biodiversity and assessment of environmental value prior to confirmation of site and design selection.
- 3.5.52 In order to avoid effects on nesting birds during construction, habitat removal will be undertaken outside breeding season (March to August). If this is not possible, a pre-construction walkover survey will be undertaken to determine if nesting birds are present. If these are identified the appropriate SSE Species Protection Plan (SPP) will be implemented by the project Ecological Clerk of Works (ECoW).
- 3.5.53 Standard mitigation measures will be implemented during construction including compliance with a project wide CEMP.
- 3.5.54 The residual effects of the Proposed Development are not considered significant. The Proposed Development is consistent with the LDP and has fully assessed both the baseline and the effects of the development on the subject site.

Hydrology and Hydrogeology

- 3.5.55 Chapter 8 of the EA considers the potential impacts on the water environment and flood risk as a result of the Proposed Development. The ground and water environment includes geology, hydrology and hydrogeology receptors. A study area of 2km from the Proposed Development has been defined to assess the potential effects on private water supply (PWS) and a wider study area of 10km to assess potential effects on the downstream water environment.
- 3.5.56 There are no statutory designations within the Proposed Development site however 7 statutory designated sites related to the water environment are identified within the wider study area within 10km of the site, and with potential hydrological connectivity.
- 3.5.57 The Proposed Development has been designed to reduce potential impacts as far as reasonably practical. This includes mitigation that is embedded into the design of the projects in accordance with industry standard methods and procedures in order to reduce impacts from construction and operation. In relation to the hydrological environment key mitigation features 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.
- 3.5.58 A Water CEMP (WCEMP) is provided within the EA 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.
- 3.5.59 Construction work will be undertaken in accordance with good practice guidance as noted at paragraph 6.12 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.
- 3.5.60 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.
- 3.5.61 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.
- 3.5.62 It has not been possible to date to conduct adequate consultation on public and private water supplies and as such the significance of potential effects is not fully quantified. Following consultations any receptors considered at risk of impacts will be mitigated through measures

outlined within the WCEMP which includes a water monitoring schedule to be agreed with consultees. It is proposed that an appropriately worded planning condition can be placed on any approval for the Proposed Development to control this issue.

3.5.63 An assessment of cumulative effects has also been considered for those developments within the same hydrological catchment. Four 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 due to good practise mitigation.

3.5.64 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 LDP Policy 3 is considered to be supportive. No effects on peatland are identified such that a peatland management plan is required and as such the provisions of SG ENV11 can be set aside in this instance.

Noise Impact

3.5.65 Noise is addressed in Chapter 8 of the EA. Substations contain various potential sources of environmental noise, the most significant of which are transformers and associated cooling equipment. The noise from these sources is usually steady and is assessed using standard noise assessment techniques. The effect of construction and associated traffic on noise receptors is also assessed.

3.5.66 The nearest residential receptor is Auchoish approximately 1.3km to the south west of the site. A handful of other properties are located at a further distance. The predicted construction and operational noise levels are well below the thresholds of negligible impact. As a result, no background noise surveys were conducted.

3.5.67 The assessment considered the potential noise effects arising due to the Proposed Development at the closest residential noise receptor and takes into account applicable planning policy and current guidance. The results show that the worst-case construction noise level is below the lower threshold of 65 dB day and 55 dB evening. Given the distance from the Proposed Development construction vibration activities will not be perceptible. As such there are no adverse construction noise or vibration effects arising from the Proposed Development.

3.5.68 An assessment of noise emissions from the proposed substation on operation was undertaken based on best practise guidance and show that the Proposed substation would not cause an adverse impact on nearby receptors.

3.5.69 It is not anticipated that there will be any cumulative impacts in terms of noise and vibration associated with construction or operations with the worse case traffic movements for a period of three months being lower than an increase of 25% of baseline traffic data on A816. During the operational phase, the operation of the substation is very unlikely to result in significant increase in traffic volume cumulant with the impacts of other developments. The noise impact, based on potential traffic change noise is therefore assessed as negligible.

3.5.70 No specific mitigation measures are required above those which are embedded within the Project – namely the requirement for equipment to be located within buildings.

3.5.71 The Noise assessment and predicted effects are consistent with LDP policy and demonstrate the acceptability of the proposals in this regard.

Traffic and Transport

3.5.72 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.

- 3.5.73 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 THC 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 adopted 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.
- 3.5.74 It is proposed that the majority of construction vehicles will access the Site via the A816 and turn onto an existing forestry road. The length of forestry track between the bellmouth and the substation site is approximately 4.7km, from there a new permanent access track will be formed to enable access for vehicles during construction and operation. Upon appointment of a Contractor further detailed proposal for the access track will be designed and it may be that further consents are required to upgrade bellmouths and or the existing forestry track. The proposed CTMP to be submitted post consent (as part of discharge of conditions) will address routeing, junction upgrades and other traffic management requirements and consents in full.
- 3.5.75 A cumulative assessment considering the Proposed Development, the Associated Development and other developments in the area, including a similar substation development at Crarae, (subject to a tandem planning application,) has been undertaken. Whilst elements of the proposals will increase traffic and required abnormal slow loads, no significant effects have been identified.
- 3.5.76 The effects of the Proposed Development on traffic and transportation are considered wholly acceptable in the context of the adopted LDP and other associated considerations and guidance.

3.6 Development Plan Conclusion

- 3.6.1 The proposals are nationally important to the transmission network infrastructure in this part of Scotland. The environmental impact of the development has been fully assessed and no significant effects are identified that cannot be satisfactorily mitigated to appropriate levels. The Proposals are consistent with the LDP position as set within STRAT 1 requiring development which is sustainable.
- 3.6.2 LDP policy DM1 recognises that ‘Renewable Energy Related Development’ can be considered an appropriate use in sensitive countryside locations. The Proposed Development would facilitate the connection and transmission of energy from a renewable source and is therefore directly related to renewable energy development.
- 3.6.3 Policy LDP DM1 recognises that proposals which “*directly support the provision of essential infrastructure*” will accord with policy.
- 3.6.4 The Proposed Development has been sited and designed to minimise impact visually and will sit well within the existing topography and landscape and will be appropriately screened. Appropriate access for construction and maintenance is proposed to minimise impact on the amenity of the community and wider transport network.
- 3.6.5 Mitigation through design has fully considered environmental factors and has resulted in a proposal which avoids area of great sensitivity and delivers essential infrastructure with minimal negative impact on the environment or communities in which it is located. The environmental impact of the development has been fully assessed against the provisions of

lead environmental policy ENV3 and associated SG policy and no significant effects are identified that cannot be satisfactorily mitigated to appropriate levels.

3.6.6 The need for the development is clear driven by the increased infrastructure capacity to meet the committed renewables' connection. Furthermore, there is a requirement to secure safe and efficient supply of energy to customers and to meet net-zero targets nationally.

3.6.7 It is considered the Proposed Development is acceptable and accords with Development Plan Policy.

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 pose the following questions:

- > 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 NPF2 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 Craig Murrail substation will form a key node on the GB electricity transmission network. The Project enables electricity to be converted between voltages (within this substation) allowing the efficient transfer of power across the GB Transmission system to meet both generation and demand requirements.

4.3.8 Argyll and Bute is a key 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.

- 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.”

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

- 4.3.17 Scottish Planning Policy (2014) (SPP) is Scottish Government policy on how nationally important land use planning matters should be addressed.

- 4.3.18 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”.

- 4.3.19 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.

4.3.20 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.

4.3.21 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.

4.3.22 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.

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*”.

4.4 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)

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 as 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 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 will be reflected in the majority of emerging policy areas including national planning policy.

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

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.
- 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.

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

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

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

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

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 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”. 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

- 4.5.35 Overall, the energy policy framework is a very important 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.
- 4.5.36 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.
- 4.5.37 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.
- 4.5.38 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, its associated adopted 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 enhanced landscaping and screening and 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 associated within the construction or operation of the Proposed Development identified via 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 – 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 will contribute towards achieving that clear policy objective and would help to fulfil the clear statutory outcomes set in the draft NPF4. The need for the development is clearly stated at a national level.
- 5.1.8 In terms of the draft NPF4, the Applicant is not relying on future policy changes to make their 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 emerging policy positions. It is however clear that the current policy position of support for high voltage energy development will not be diminished by the emerging framework.
- 5.1.9 It is the cumulative positive effect of delivering a large number of individual electricity infrastructure projects which will move Scotland towards where it needs to be if net zero ambitions are to be achieved. 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.

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