Scottish & Southern Electricity Networks

TRANSMISSION

Annex I

Habitat Regulations Appraisal (HRA)

Argyll and Kintyre 275 kV

Substations: LT288 Crarae

November 2022

Scottish & Southern Electricity Networks

TRANSMISSION

CONTENTS

1 INTRODUCTION

1.1.1 Environmental Resources Management Ltd (ERM) has been commissioned by Scottish & Southern Electricity Networks (SSEN) Transmission to assess the potential impacts associated with the proposed Crarae 275 kilovolts (kV) substation. SSEN Transmission propose to construct and operate a 275 kV substation in Argyll and Kintyre (the Proposed Development), under the Town and Country Planning Act, with overhead line (OHL) Tie ins (the Associated Development) to connect the substation to the transmission network, under Section 37 of the Electricity Act hereafter referred to together as 'the Project'.

1.1.2 This document has been produced to inform the Habitats Regulations Appraisal (HRA) process for the Project. It provides information to enable the screening of the Project with respect to its potential to have a likely significant effect (LSE) on European and Ramsar sites of nature conservation importance.

2 PROJECT DESCRIPTION

2.1 Background

2.1.1 SSEN Transmission operating under licence held by Scottish Hydro Electric Transmission plc, owns, operates and develops the high voltage electricity transmission system in the north of Scotland and remote islands and has a statutory duty under Schedule 9 of the Electricity Act to develop and maintain an efficient, co-ordinated and economical electrical transmission system in its licence area.

2.1.2 SSEN Transmission proposes to construct a new 275 kV electricity substation (located at Grid Ref 187725 691030) in order to upgrade the substation to current specification and standards and provide reinforcement to the existing network which will support the continued generation of renewable energy.

2.2 The Project

2.2.1 The Project will connect a new 275kV electricity substation to the recently constructed 275 kV Inveraray to Crossaig Overhead line (OHL) network in order to provide an upgrade to the existing Crarae substation 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 Project also includes an OHL Tie in, connecting the substation to the Inveraray to Crossaig OHL..

2.2.2 The Proposed Development subject to consent under the Town and Country Planning Act comprises:

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

2.2.3 Components of the Associated Development subject to Section 37 of the Electricity Act 1989:

- Construction of three new steel lattice towers to support the realigned overhead line which will connect into the new substation;
- Tree and vegetation clearance where required;
- Five temporary towers;
- Approximately 622 m of temporary access tracks;
- Temporary overhead line diversions during construction; and
- Dismantling of the existing overhead line section connecting the existing 132kV substation which comprises six redundant towers and associated cabling.

2.2.1 The substation will not be illuminated at night during normal operations. Floodlights will be installed at the substation but would only be used in the event of a fault during the hours of darkness or during the over-run of planned works.

2.2.2 New access tracks to the substation and OHL towers will be constructed. Forestry roads leading to the new access track may require upgrading to ensure suitability for transformer delivery. This will be considered as part of a separate detailed assessment report once the transformer supplier and haulier are selected by SSEN Transmission.

2.3 Construction and Access

2.3.1 Key tasks during construction of the Proposed Development are as follows.

- Site clearance, including removal of existing vegetation; creation of temporary welfare and material laydown area;
- Creation of a level platform through processing of site won materials and import of commercial aggregates, as required;
- Connection into drainage network;
- Concrete foundations/bases for substation building and electrical equipment;
- Installation of new transformers;
- Restoration of ground temporarily disturbed during construction;
- Landscape earthworks and tree/shrub planning;
- Erection of security fence around the site perimeter; and
- Commissioning.

2.3.2 Key tasks during construction of the Associated Development are as follows:

- Existing OHL network diversion;
- Vegetation management and forestry clearance;
- Road improvements and access;
- Creation of a level platform through processing of site won materials and import of commercial aggregates, as required;
- Concrete foundations/bases for new tower and electrical equipment;
- Installation of electrical plant e.g., cable sealing ends and tower. Scaffolding will be required for cable jointing;
- Restoration of ground temporarily disturbed during construction;
- Erection of security fence around the site perimeter;
- Commissioning; and
- Removal of temporary OHL diversion and reinstatement.

2.3.3 Access to the Project during construction and operation will be via the A816 and will utilise existing forestry tracks. During the construction phase, there will be a requirement for access to, and egress from, the Proposed Development site by heavy goods vehicles (HGVs) and light traffic.

2.4 Site Establishment and Laydown Area

2.4.1 A temporary staff welfare and material laydown area will be established. The area would be regraded and revegetated on completion of construction.

2.5 Program and Hours of Working

2.5.1 It is anticipated that construction would take place over a 24-month period. Detailed programming of the works will be the responsibility of the appointed contractor in agreement with SSEN Transmission.

2.5.2 Construction activities would in general be undertaken during daytime periods. This would involve work between approximately 07:00 to 19:00 on week days and 07:00 to 18:00 on Saturdays. Any variation in these working hours would be agreed in advance with Argyll and Bute Council on an as-required basis. All deliveries would take place during agreed weekday hours only.

2.6 Operation

2.6.1 The proposed substation would normally be unmanned, with regular operational switching being managed remotely through the SSE National Control Centre.

2.6.2 Substation plant will require maintenance and inspection at monthly intervals and some maintenance work would be undertaken most years. There would be other occasional visits as required for operational duties. This level of activity is consistent with the current substation.

2.7 Requirement for Habitats Regulation Appraisal

2.7.1 Where a development has the potential, either alone or in combination with other plans or projects, to result in likely significant effects on one or more European sites [(1)] [(2)], it is subject to the requirements of The Conservation of Habitats and Species Regulations (2017) (the Habitats Regulations) with regards to Section 37 developments, and the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended in Scotland) for Town and Country Planning developments.

2.7.2 If a development is likely to affect a European site and/or a European marine site, a report must be provided with the application showing the site(s) that may be affected together with sufficient information to enable the Competent Authority to undertake a Habitat Regulations Appraisal (HRA). For the Proposed Development, the Competent Authority is Argyll and Bute Council, and the Energy Consents Unit for the Associated Development. Both competent authorities are advised by NatureScot.

(1) These are Special Areas of Conservation (SACs), candidate Special Areas of Conservation (cSACs) and Special Protection Areas (SPAs). this protection is also extended to proposed SPAs and proposed SACs. Where Ramsar site interests coincide with qualifying interests protected under an SPA or an SAC it is Scottish government policy to extend the same protection to these features.

(2) Scottish Government (2019) Implementation of Scottish Government policy on protecting Ramsar sites. Guidance Document.

3 METHODOLOGY

3.1.1 The approach to the HRA has followed that set out in the Conservation of Habitats and Species Regulations 2017, as amended ('The Habitats Regulations') and NatureScot guidance on the consideration of plans or projects affecting SACs and SPAs [1] [2]. It has also taken account of a range of other guidance material including that produced by the European Commission (EC) (2018a [3]), (2018b) [4] 2007 [5]; 2002 [6].

3.2 Overview of HRA Process

3.2.1 The HRA process comprises four main stages, these are:

- **Stage 1 Screening** to identify the likely effects of a project on a European Site and consider whether the effects are likely to be significant;
- **Stage 2 Appropriate Assessment** to determine whether the integrity of the European site will be adversely affected by the project;
- **Stage 3 Assessment of Alternative Solutions** to establish if there are any that will result in a lesser effect on the European site; and
- **Stage 4 Imperative Reasons of Overriding Public Interest (IROPI)** and **Compensatory Measures** to establish whether it is necessary for the project to proceed despite the effects on the European site, and to confirm that necessary compensatory measures are in place to maintain the coherence of the European site 2000 network.

3.2.2 Each of the stages is discussed in more detail in the following sections.

Stage 1 – Screening

3.2.3 The purpose of the screening stage is to identify likely impacts upon European sites, as a result of either a project alone or in combination with other plans and projects and consider whether these impacts are likely to be significant.

3.2.4 In order to determine if the Project is likely to have any significant effects on the designated sites the following issues have been considered:

- could the proposals affect the qualifying interest and are they sensitive / vulnerable to the effect;
- the probability of the effect happening;
- the likely consequences for the site's conservation objectives if the effect occurred; and
- the magnitude, duration and reversibility of the effect.

The objective of the screening stage is to conclude whether;

1. no likely significant effect will occur;
2. a likely significant effect will occur; or
3. it cannot be concluded that there will be no likely significant effect.

3.2.5 If the screening stage concludes the second or third outcome, then an Appropriate Assessment (AA) is triggered. The implications of the identified likely significant effect(s) on the European designated site, in view of its specific conservation objectives and qualifying features and the nature, scale and location of the potential impact should be

(1) SNH (2014) Natura 2000 Casework Guidance – How to consider plans and projects affecting Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

(2) SNH (2019) Guidance Note - The handling of mitigation in Habitats Regulations Appraisal - the People Over Wind CJEU judgement

(3) European Commission (2018) Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. EC

(4) European Commission (2018) Guidance on Energy Transmission Infrastructure and EU nature legislation. EC

(5) European Commission (2007) Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC. EC

(6) European Commission (2002) Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites. Methodological Guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. EC

assessed. The term Habitat Regulations Appraisal encompasses both the initial screening stage and, where required, the follow on AA stage.

Stage 2 – Appropriate Assessment

3.2.6 An AA is required to determine potential effects of a project upon the integrity of European sites. It should provide and analyse sufficient information to allow Argyll and Bute Council (for the substation) and Energy Consents Unit (overhead line diversion), as the competent authorities to determine whether the aspects of the project pertinent to their consents will or will not adversely affect the integrity of European sites. AA should exclusively focus on the qualifying features of the European site and it must consider any impacts on the conservation objectives of those qualifying interests. It should also be based on, and supported by evidence that is capable of standing up to scientific scrutiny. EC guidance states that without proper reasoning the assessment does not fulfil its purpose, and cannot be considered 'appropriate' and therefore cannot be consented. In terms of what is reasonable, guidance states "*to identify the potential risks, so far as they may be reasonably foreseeable in the light of such information as can be reasonably obtained*" (1).

3.2.7 In undertaking an AA, there are two phases;

- a scientific evaluation of all the likely significant effects of the project on the relevant qualifying interests of a European site; and
- a conclusion based on outcomes of the scientific evaluation whether the integrity of a European site will be compromised.

3.2.8 The emphasis for AA is to prove that no adverse impacts due to a project will occur which would undermine a European sites integrity.

3.2.9 Site integrity can be defined as:

"*the coherence of its ecological structure and function, across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified*" (2).

3.2.10 The assessment will also take into account any avoidance or mitigation measures which will be implemented to avoid or reduce the level of impact from the project. The Competent Authority may also consider the use of conditions or restrictions to help avoid adverse effects on site integrity.

3.2.11 If the AA concludes that there will be an adverse effect on the integrity of the European site, or that there is uncertainty and a precautionary approach is taken, then consent can only be granted if there are no alternative solutions, IROPI is applicable and compensatory measures have been secured.

Stage 3 – Assessment of Alternative Solutions

3.2.12 All feasible alternatives have to be analysed to ensure that there are none which *"better respect the integrity of the site in question"* and its contribution to the overall coherence of the Natura 2000 network (EC, 2007). Alternatives could include the location of the site, its scale and design, and the way in which it is constructed and operated. The 'zero' option also has to be considered.

3.2.13 The comparisons of alternatives should not allow other assessment criteria (*e.g.,* economics) to overrule ecological criteria (EC, 2007). However, the same guidance also refers to the opinion for the case C-239/04 (3), where the opinion of the Advocate General was that *"the choice does not inevitably have to be determined by which alternative least adversely*

(1) Scottish Natural Heritage (SNH) (2001) Natura Casework Guidance: Consideration of Proposals Affecting SPAs and SACs. SNH Guidance Note Series. SNH

(2) Scottish Natural Heritage (SNH) 2014 Natura Caseowork Guidance: How to consider plans and projects affecting Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). SNH

(3) Commission of the European Communities V Portuguese Republic [2006] Case C.239/04

affects the site concerned. Instead, the choice requires a balance to be struck between the adverse effect on the integrity of the SPA and the relevant reasons of overriding public interest".

Stage 4 - Imperative Reasons for Overriding Public Interest and Compensation Measures

3.2.14 Where a development has an adverse effect on the integrity of a European site and there are no alternative solutions consent can only be granted if there are imperative reasons of overriding public interest, including those of social or economic nature which would require the realisation of a project. A definition of 'overriding public interest' does not occur in the directive, however examples considered are:

- human health, public safety or beneficial consequences of primary importance to the environment; or
- any other reasons which are considered by the Competent Authority to be IROPI taking account of the opinion of the EC; and
- if the site does not host a priority habitat or species then IROPI must be demonstrated, and the reasons can include those of a social or economic nature.

3.2.15 If the importance of the project is deemed to outweigh the effects which will result on the European site, and there are no alternatives, compensatory measures must be secured before consent is granted. Compensatory measures are independent of the project and are intended to offset the adverse effects of a project, corresponding specifically to the negative effects on habitats and species concerned.

3.2.16 To be acceptable, compensatory measures should:

- take account of the comparable proportions of habitats and species which are adversely affected;
- be within the same bio-geographical range within which the European site is located;
- provide functions which are comparable to those which justified the selection of the of the original site; and
- have clearly defined implementation and management objectives so the measures can achieve the aim of maintaining the overall coherence of the network.

3.3 Consultation

3.3.1 A summary of the comments received from stakeholders, together with how they have been addressed within this HRA Screening Report, is provided in **Table 3.1** below.

Table 3.1 - Summary of consultation undertaken on the HRA Screening Report

CONSULTEE	COMMENT	ADDRESSED
NatureScot – email consultation on 30September 2021 to discuss ornithology impacts from the project	We note the intention to use survey information dating back to 2015/16 and, although we generally determine that data older than 5 years is out of date, given the location of the substations within habitats of low ecological and conservation value (predominately commercial forestry), this approach is deemed acceptable providing the baseline habitat conditions have not changed since the initial surveys. However, we do suggest that you consult with the RSPB, FLS and the Argyll Raptor Study Group to determine if they have any more recent bird recordings that you could use to feed into the assessment. If the substation works are capable of disturbing schedule 1 species, then they should be scheduled to be completed out-with the breeding bird season. We also wish to highlight that we are seeing increasingly more white tailed eagle breeding activity in Mid-Argyll and Kintyre, and pairs could have set up nests in commercial forestry since the initial bird surveys were undertaken. As such, you will need to consider this species (as well as osprey) in the pre-felling / construction checks.	Species identified by NatureScot assessed for connectivity to European sites.

4 ENVIRONMENTAL BASELINE

4.1.1 The Project baseline has been informed by a range of published and publicly available data including:

- SNH Information Services (SNHi) – Data on designated sites and notable species;
- Scottish Biodiversity List;
- Vantage Point (VP) surveys, raptor surveys, wintering wildfowl surveys and breeding bird surveys following guidance issued by NatureScot[1] carried out between 2015-2018 to inform the EIA for the OHL which covered the proposed substation location; and
- VP surveys undertaken for the construction of the Inveraray-Crossaig OHL between March to May 2021.

4.1.2 Based on the data collected from consultation and desk-based study, an Extended Phase 1 Habitat Survey [2] has been undertaken to inform the ecological assessment:

4.1.3 A summary of the baseline environment is presented in the Project Environmental Appraisal.

[1] *NatureScot. Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds. Guidance. Version 1. July 2016.*

[2] *In accordance with JNCC Phase 1 survey 2010 methodology*

5 SCREENING OF EUROPEAN SITES AND FEATURES

5.1 Approach to Initial Screening

5.1.1 This stage is essentially a site-identification / selection process which effectively identifies all those designated sites and the relevant features which are at risk of likely significant effects (LSE), should those features be sensitive to the relevant effects.

5.1.2 The criteria used in this first stage of selection takes account of the location of the European sites (including Ramsar sites) in relation to the Project, the area of influence (AOI) of potential impacts associated with the Project and the ecology and distribution of qualifying features. These criteria are described in **Table 5.1.**

5.1.3 Due to the nature and location of the Project, only terrestrial European sites or sites with bird species qualifying interest features have been included in the initial screening – marine SACs have been screened out due to the lack of impact pathway.

Table 5.1 Criteria Used for Initial Screening of Relevant European Sites

CRITERIA USED FOR SCREENING OF RELEVANT EUROPEAN SITES	
1	European or Ramsar site with physical overlap with the Project location
2	European or Ramsar site with adjoining 'functionally linked habitat' with physical overlap with the Project
3	European or Ramsar site with a qualifying feature located within the potential area of influence (the AOI) associated with the Project; the area of influence is considered to be a radius of 5 km of the Project.
4	European or Ramsar site with qualifying mobile species whose range (e.g., foraging, migratory, overwintering, breeding or natural habitat range) may interact with potential effects from the Project

5.1.4 Details of European Protected sites initially screened in under one or more of the above criteria are provided in **Table 5.2**. The qualifying features for each site are detailed, using publicly available information obtained from the Magic[1], SiteLink[2] and JNCC[3] websites. The most recent SPA citations available on NatureScot SiteLink have been used to inform the HRA.

5.1.5 Connectivity with SPAs has been informed by NatureScot Guidance[4].

1 The MAGIC website provides geographic information about the natural environment from across government. The information covers rural, urban, coastal and marine environments across Great Britain. It is presented in an interactive map which can be explored http://www.magic.gov.uk/ accessed 12.01.2022

[2] NatureScot: https://sitelink.nature.scot/home accessed 11.01.2022

[3] Joint Nature Conservation Committee: http://jncc.defra.gov.uk/page-4 accessed 12.01.2022

[4] Scottish Natural Heritage (2016) Assessing Connectivity with Special Protection Areas (SPAs) Guidance

Table 5.2 Initial Screening of Relevant European Sites

EUROPEAN SITE NAME (SITE CODE)	AREA OF SITE (HA)	APPROXIMATE DISTANCE FROM PROJECT (KM)	QUALIFYING FEATURES OF INTEREST	SCREENED IN/OUT OF ASSESSMENT
Special Protection Area (SPA)				
Knapdale Lochs (UK9003301)	112.39	Access Track: 4.41 km Project: 17.7 km	**Annex I Species:** Regularly supports a breeding population of Annex 1 species Black-throated diver *(Gavia arctica)* (Four pairs, estimated 2% of GB breeding population)	Screened in – within SPA connectivity distance for black-throated diver.
Special Area of Conservation (SAC)				
Moine Mhor (UK0019839)	1149.02	Access Track 1.47 Km Project: 13.6 km	**Annex I habitats:** - Active raised bogs (priority feature) - Degraded raised bogs still capable of natural regeneration - Mudflats and sandflats not covered by seawater at low tide - Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) - Old sessile oak woods with Ilex and Blechnum in the British Isles **Annex II species:** - Marsh fritillary butterfly *Euphydryas (Eurodryas, Hypodryas) aurinia* - Otter (*Lutra lutra*)	Screened out – traffic movements will be within 1.47 km however the Project is 13.6 km from the SAC with no impact pathway.
Taynish and Knapdale Woods (UK0012682)	1017.96	Access Track: 3.69 km Project: 16.7 km	**Annex I habitats that are primary reason for site designation:** - Old sessile oak woods with Ilex and Blechnum in the British Isles - Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea **Annex 2 species that are primary reason for site designation:** - Marsh fritillary butterfly *Euphydryas (Eurodryas, Hypodryas) aurinia* - Otter (*Lutra lutra*)	Screened out - traffic movements will be within 3.69 km however the Project is 16.7 km from the SAC with no likely impact pathway.

5.2 Effects Considered in Assessment

5.2.1 The potential effects upon European site(s) as a result of the Project that have been considered within this HRA report are listed in the following sections.

5.2.2 No potential effects on supporting habitats within the SPA, SAC or Ramsar sites are predicted.

5.2.3 All qualifying interest features of European or Ramsar sites and potential effects on these features have been considered within this assessment.

5.2.4 Potential effects on ornithology features outside of the European sites are considered to comprise of:

- indirect loss of bird habitats due to the displacement of birds (disturbance and/or displacement) by construction works and operation;
- accidental mortality due to collision with project infrastructure; and
- potential barrier effects as a result of the presence of infrastructure.

5.2.5 All other impacts arising from the Project are not likely to have significant effects due to the lack of connectivity and/or distance such that there is no pathway of effect between the European sites and the Project.

6 DETERMINATION OF LIKELY SIGNIFICANT EFFECTS

6.1 Introduction

6.1.1 The European site initially screened in for assessment of likely significant effects (LSE) is documented in **Table 5.2.** The Knapdale Lochs SPA site was selected for screening using the criteria outlined in **Table 5.1**. There is therefore a need to consider the potential for LSE on this site in relation to the Project.

6.1.2 In addition, in **Section 5.2,** the likely effects that may result during construction, operation and maintenance and decommissioning of the Project (and are relevant to the receptors being considered here) are identified to enable these to be considered. This section combines that information for the Project alone and presents the assessment of LSE, thus providing the necessary information for Stage 1 of the Habitats Regulations Appraisal process.

6.1.3 The assessment of LSE is based on the Project's current understanding of the baseline environment and the scope and nature of the proposed project activities, together with the relevant information available for Knapdale Lochs SPA. Consultee and advisor responses to this document, and refinements to the Project design may change this assessment.

6.1 Assessment of Likely Significant Effects (LSE)

6.1.1 The assessment and conclusions, with regards to LSEs on the Knapdale Lochs SPA (**Table 5.2**) and the relevant features identified, has been carried out taking account of the AOI of potential impacts, location of the European site under consideration and (where known) the distribution of qualifying features in relation to the Project. The information is presented below in **Table 6.1**.

Table 6.1 Assessment of LSE

DESIGNATED SITE	FEATURES SCREENED IN	RELEVANT EFFECT	CONSIDERATION OF LSE	CONCLUSION OF LSE
Knapdale Lochs (SPA)	Black-throated diver *(Gavia arctica)* breeding population	Indirect loss of bird habitats due to displacement of birds (disturbance and/or displacement) by construction works and operation.	The Project does not physically overlap the SPA. The construction access track is approximately 4.41 km from the closest SPA loch, however the development itself is approximately 17.7 km from the closest SPA loch. Traffic along the main road to the construction access track will not be substantially increased by the project development. During the breeding season black throated diver foraging range is likely to be less than 10 km.[1] The closest waterbody on which divers were recorded during baseline surveys for the Inveraray – Crossaig OHL project is approximately 2 km south of the Project Black-throated diver will consequently not be significantly disturbed by project activities, nor displaced from breeding, foraging or resting areas by the onshore construction traffic or final development. Overall no likely significant effects are predicted.	No LSE

[1] NatureScot (2016) Assessing Connectivity with Special Protection Areas https://www.nature.scot/sites/default/files/2018-08/Assessing%20connectivity%20with%20special%20protection%20areas.pdf Accessed 11.01.2022

		Accidental mortality due to collision with project infrastructure.	During the breeding season black throated diver foraging range is likely to be less than 10 km.[1] As the SPA is approximately 17.7 km from the Project site, birds from the SPA are unlikely to pass over the Project site travelling to feeding lochs. The closest black-throated diver flights recorded during baseline surveys for the Inveraray – Crossaig OHL were approximately 6 km south west of the Project. Black-throated divers are unlikely to fly near to, or over, the project infrastructure. No likely significant effects are predicted.	No LSE
		Potential barrier effects as a result of the presence of infrastructure.	During the breeding season black throated diver foraging range is likely to be less than 10 km.[2] As the SPA is approximately 17.7 km from the Project site, birds from the SPA are unlikely to pass over the Project site travelling to feeding lochs. The closest black-throated diver flights recorded during baseline surveys for the Inveraray – Crossaig OHL were approximately 6 km south west of the Project. Black-throated divers are unlikely to fly near to, or over, the project infrastructure. No likely significant effects are predicted.	No LSE

[1] NatureScot (2016) Assessing Connectivity with Special Protection Areas https://www.nature.scot/sites/default/files/2018-08/Assessing%20connectivity%20with%20special%20protection%20areas.pdf Accessed 11.01.2022

[2] NatureScot (2016) Assessing Connectivity with Special Protection Areas https://www.nature.scot/sites/default/files/2018-08/Assessing%20connectivity%20with%20special%20protection%20areas.pdf Accessed 11.01.2022

6.2 In combination Assessment

6.2.1 Two small new developments in the vicinity of the proposed Project have been identified: the proposed installation of two 33 kV double poles under the existing 33 kV overhead line at Minard, approximately 2 km south east of the Project site, and the construction of an access track on the Cumlodden Estate approximately 2.5 km east of the Project site. Neither development is predicted to result in in-combination effects with the Project.

6.3 Summary of LSEs

6.3.1 As a result of the HRA Screening assessment undertaken, no likely significant effects are predicted on any European protected sites.