

# 1 INTRODUCTION

## 1.1 Overview of the Proposed Development

- 1.1.1 This Environmental Impact Assessment Report (EIA Report) has been prepared by Ramboll UK Limited (Ramboll) on behalf of Scottish Hydro Electric Transmission plc (the Applicant) who, operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission), own, operate and develop the high voltage electricity transmission system in the north of Scotland and remote islands. This EIA Report accompanies the Applicant's application for consent under section 37 of the Electricity Act 1989, as amended.
- 1.1.2 The Applicant is proposing to construct and operate an approximately 9 kilometre (km) double circuit 275 kV overhead line (OHL), supported by lattice steel towers between a proposed substation at Creag Dhubh and a connection point on the recently constructed Inveraray – Crossaig 275 kV capable OHL circuit, in Argyll (the 'Proposed Development'). In this EIA Report the Applicant and SSEN Transmission are used interchangeably unless the context requires otherwise. The location of the Proposed Development and Limit of Deviation (LOD) (known as 'the Site') is shown in **Figure 2.1: Proposed Development (EIAR Volume 3a)**.
- 1.1.3 The scope of this application is limited to construction and operation of the OHL, ancillary works and access tracks. The Proposed Development would not have a fixed operational life. It is assumed that the Proposed Development will be operational for 50 years or more. The effects associated with the construction phase can be considered to be representative of worst-case decommissioning effects, and therefore no separate assessment of decommissioning effects is proposed as part of the EIA.

## 1.2 Project Need

- 1.2.1 The original transmission network in Argyll and Bute was constructed over 60 years ago and designed to transmit electricity to consumers in rural areas of low-density population. As the UK strives for Net Zero (achieving a balance between the greenhouse gases emitted into the atmosphere and those taken out), the Applicant has seen a significant increase in generator connection applications in Argyll and Kintyre in the last 18 months, predominantly in renewable generation. In terms of this renewable generation (i.e., onshore windfarms), there are infrastructure requirements needed to connect generators to the Applicant's transmission network.
- 1.2.2 As the transmission licence holder in the north of Scotland, and to maintain compliance with the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS), there is a requirement for SSEN Transmission to increase its network capability in Argyll and Kintyre, beyond that already under current construction and public development, to enable the connection of further renewable generation and to export to the wider GB network. This group of works designed to deliver the required increase in network capacity has been named the 'Argyll and Kintyre 275 kV Strategy'<sup>1</sup>.
- 1.2.3 The Proposed Development forms part of this strategy and aims to reinforce the existing transmission network connections in the Argyll region, to enable renewable energy projects to connect to the GB transmission network and to ensure security of supply. This project will enable the connection

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<sup>1</sup> <https://www.ssen-transmission.co.uk/projects/argyll-and-kintyre-275kv-strategy/>

between North Argyll and the reinforcement projects to the south. This in turn provides power export routes to the north via Creag Dhubh substation and the south via the Kintyre-Hunterston link. This in turn provides power export routes to the north via Creag Dhubh substation (Creag Dhubh to Dalmally connection) and the south via the Kintyre-Hunterston link. Infrastructure for the transportation of low carbon electricity is essential to delivering the Scottish Government target for the equivalent of 50% of Scotland's heat, transport, and electricity consumption to be supplied from renewable sources by 2030. This is why enabling the transition to a low carbon economy remains the Applicant's main strategic purpose. Further details on the Applicant's Sustainability Strategy are provided in **Section 1.5**.

### 1.3 Background of Proposed Development

- 1.3.1 A combined corridor and route selection exercise (Stage 1 and 2) was completed identifying an 'Original Preferred Route' between the proposed Creag Dhubh substation and a connection point on the recently constructed Inveraray-Crossaig circuit in Argyll, with public consultation initiated in June-July 2021. Details of all consultation documents can be found on the Applicant's project website: <https://www.ssen-transmission.co.uk/projects/creag-dhubh-inveraray-275kv-overhead-line/>.
- 1.3.2 Prior to the consultation, the Applicant was aware of an Unexploded Ordinance (UXO) concern on the Ladyfield Plantation, along the Original Preferred Route. However, after further engagement with the landowner, the MOD and a specialist UXO contractor, further information on the extent of UXO presence was gathered. It was concluded that the time and cost to mitigate the UXO risk was considered far in excess of changing the route and therefore the route was moved to the west of the A819 (the New Proposed Route).
- 1.3.3 An alignment selection exercise (Stage 3) was completed in April 2022 identifying a Preferred Alignment which was consulted on in May-June 2022. The Preferred Alignment was taken forward as the Proposed Alignment and is now being taken forward to the consenting process (Stage 4) and forms the Proposed Development for which consent is being sought (**Figure 1.2: Proposed Development, EIAR Volume 3a**).

### 1.4 Legislative Requirements

- 1.4.1 An application for consent for the Proposed Development will be made to the Scottish Ministers under section 37 of the Electricity Act 1989, along with a request for a direction that planning permission be deemed to be granted under section 57 (2) of the Town and Country Planning (Scotland) Act 1997. As the Proposed Development involves the construction of an OHL with a voltage of more than 132 kV it is categorised as 'Schedule 2' development under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (the 'EIA Regulations'). An official request for a Screening Opinion was not made to the Scottish Ministers. However, considering the potential for likely significant effects on the environment by virtue of factors such as its nature, size, or location, a voluntary EIA Report has been prepared in support of the s37 application.
- 1.4.2 A request for a Scoping Opinion was made to the Scottish Ministers under Regulation 12 of the EIA Regulations in March 2022 (ECU Reference ECU00003442). A Scoping Report (**Appendix 4.1: Scoping Report, EIAR Volume 4**) was submitted to support the request, which sought input from the Energy Consents Unit (ECU), and statutory and non-statutory consultees regarding the information to be provided within this EIA Report.

- 1.4.3 The Scoping Opinion of the Scottish Ministers was issued on 15 June 2022 confirming the scope of the EIA Report. Further details of this are contained in **Chapter 4: EIA Consultation and Scope (EIAR Volume 2)** and accompanying appendices.

## 1.5 Sustainability Strategy

- 1.5.1 A key part of SSEN Transmission's Sustainability Strategy is to achieve Biodiversity Net Gain (BNG) in future projects. As such, the ambition is to ensure that activities not only maintain the existing balance that exists but enhance the biodiversity in the area.
- 1.5.2 The Proposed Development has been designed to:
- Ensure natural environment considerations are included in decision making at each stage of a project's development;
  - Utilise the mitigation hierarchy to avoid impacts by consideration of biodiversity in project design;
  - Positively contribute to the United Nations (UN) and Scottish Government Biodiversity strategies by achieving an overall 'No Net Loss' on new infrastructure projects gaining consent in 2020 onwards and achieving Net Gain on projects gaining consent in 2025 onwards; and
  - Work with our supply chain to gain the maximum benefit during asset replacement and upgrades.

## 1.6 Biodiversity Net Gain

- 1.6.1 BNG is a process which leaves nature in a better state than it started. Although it is an internationally recognised process and tool within the development industry, it is not a term that is widely used or implemented in Scotland. A small handful of businesses are making voluntary commitments to incorporate BNG into their projects, including the Applicant.
- 1.6.2 The Applicant has developed a BNG toolkit based upon the Natural England metric, which aims to quantify biodiversity based upon the value of habitats for nature. It is an efficient and effective method for demonstrating whether development projects have been able to maintain or increase the biodiversity value of a development site after construction works.
- 1.6.3 For BNG to be used appropriately and to generate long-term gains for nature, the good practice principles established by the Business and Biodiversity Offset Programme (BBOP) should be followed. These principles have been established in the context of UK development by the Construction Industry Research and Information Association (CIRIA), the Chartered Institute for Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA)<sup>2</sup>. BNG does not apply to Statutory designated sites or irreplaceable habitats (e.g., Ancient Woodland, blanket bog)<sup>3</sup>.
- 1.6.4 In line with the Applicant's Sustainability Strategy, a BNG assessment is being undertaken and will be finalised following submission<sup>4</sup> of the s37 Application.

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<sup>2</sup> CIRIA, CIEEM and IEMA, 2016. Biodiversity Net Gain: Good Practice Principles for Development. Available at: <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf> [Accessed June 2022]

<sup>3</sup> Any irreplaceable habitats identified, including ancient woodland and good/moderate condition blanket bog, are entered into the assessment toolkit. This is a requirement of the BNG process as it is not possible to compensate for losses to irreplaceable habitat and they are therefore not quantified. This follows UK best practice and the SHE Transmission BNG guidance.

<sup>4</sup> As a BNG assessment is not a planning requirement, it will be submitted post application. As BNG is based on definitive numbers, this allows the BNG assessment to be undertaken based on final designs, resulting in a more accurate output.

- 1.6.5 Further details on habitat enhancement and management opportunities are provided in **Technical Appendix 8.2: Outline Habitat Management Plan (EIAR Volume 4)**.

## 1.7 Purpose of the EIA Report

- 1.7.1 This EIA Report presents information on the identification and assessment of the likely significant positive and negative environmental effects of the Proposed Development. The EIA Report has been prepared to meet the requirements of Schedule 4 (Information for Inclusion in EIA Reports)<sup>5</sup> of both the Electricity Works and Town and Country Planning EIA Regulations, and the Institute of Environmental Management and Assessment (IEMA) Quality Mark Criteria. The EIA Report also takes into account relevant guidance set out in the Scottish Government Planning Advice Note (PAN)<sup>6</sup>, which emphasises the importance of achieving a proportionate EIA scope, focussed on the likely significant effects.
- 1.7.2 Further details of the statutory requirements for EIA are set out in **Chapter 5: Methodology (EIAR Volume 2)**.

## 1.8 EIA Report Structure

- 1.8.1 The EIA Report comprises four volumes:
- Volume 1: Non-Technical Summary (NTS);
  - Volume 2: Main Report;
  - Volume 3a: Figures;
  - Volume 3b: Visual Representations; and
  - Volume 4: Technical Appendices.
- 1.8.2 Additional documentation that will be submitted with this application includes:
- Section 37 application (the content of the application as set out in **Chapter 2: Description of the Proposed Development, EIA Report Volume 2**);
  - Cover letter;
  - Planning Statement;
  - Public Road Access Drawings; and
  - Pre-Application Consultation Report.

## 1.9 Notifications

- 1.9.1 Notice will be served to the relevant planning authorities, in this case Argyll and Bute Council (ABC) of the application to the Scottish Ministers for consent under s37 of the Electricity Act.
- 1.9.2 In accordance with the Electricity (Applications for Consent) Regulations 1990, and Regulation 14 of the EIA Regulations, the application and this EIA Report will be advertised in the following newspapers:
- Edinburgh Gazette;

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<sup>5</sup> Schedule 4 of the EIA regulations determine what information is required to be included in the Environmental Impact Assessment Report. Schedule 4 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 available at: <https://www.legislation.gov.uk/ssi/2017/101/schedule/4/made>

<sup>6</sup> Scottish Government, (2013). Planning Advice Note 1/2013: Environmental Impact Assessment. Available at: <https://www.gov.scot/publications/planning-advice-note-1-2013-environmental-impact-assessment/> [Accessed June 2022].

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

1.9.3 There is currently a temporary relaxation of the requirements for displaying paper copies of the EIA Report at a named public place under the temporary coronavirus modifications to the Electricity Works Regulations. However, these temporary provisions are to expire at the end of September 2022<sup>7</sup>, at the time the application is due to be submitted. Therefore, electronic versions of the application including this EIA Report and its supporting volumes will be available to download from SSEN Transmission's website:

- <https://www.ssen-transmission.co.uk/projects/creag-dhubh-inveraray-275kv-overhead-line/>

1.9.4 The EIA Report will also be able to be viewed via the ECU website:

- [www.energyconsents.scot](http://www.energyconsents.scot)

1.9.5 In addition, paper copies of the EIA Report will be made available at a named public place, with the address(es) to be published in the notice.

## 1.10 Comments

1.10.1 Any representations on the s37 consent application may be submitted via:

- The Energy Consents Unit website: [www.energyconsents.scot/Register.aspx](http://www.energyconsents.scot/Register.aspx);
- By email to the Scottish Government, Energy Consents Unit mailbox at [representations@gov.scot](mailto:representations@gov.scot); or
- By post to the Scottish Government, Energy Consents Unit, 4<sup>th</sup> Floor, Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU.

1.10.2 Written or emailed representations should be dated, clearly stating the name (in block capitals), full return email and postal address of those making representations, identify the Proposed Development (Creag Dhubh to Inveraray 275 kV OHL Connection) and specify the grounds for representation. Only representations sent by email to [representations@gov.scot](mailto:representations@gov.scot) will receive acknowledgement. All representations should be received **60 days from date of validation**, although Ministers may consider representations received after this date.

1.10.3 The validation date will be available on the ECU website at [www.energyconsents.scot/Register.aspx](http://www.energyconsents.scot/Register.aspx) and the SSEN Transmission's project website: <https://www.ssen-transmission.co.uk/projects/creag-dhubh-inveraray-275kv-overhead-line/>

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<sup>7</sup> Chief Planner Letter: Stakeholder Update – July 2022, Scottish Government