

Creag Dhubh to Dalmally 275kV Connection Environmental Impact Assessment Report Volume 4| Appendix 10.7

SEPA Consultation Meeting Minutes

April 2022



MINUTES OF MEETING

Project name **Creag Dhubh Substation**
Project no. **1700003673**
Subject **SSEN Teams Meeting with SEPA**
Meeting date **20/10/2021**
Location **Via Teams**
Meeting no.
Attendees **SEPA: Alex Candlish and Claire Campbell.**
Note: Alex had to drop off after 10 minutes

SSEN: Jackie Taylor

Ramboll: (Consultants working for SSEN to produce EA and supporting documents):
Rhiannon Ferguson and Rebecca Raby-Smith (PM team); Jeff Turner (Peat Specialist); Trefor Hillas (Hydrology Specialist)

Overview:

Discussion to inform Peat Management Plan for re-using surplus peat from the construction of the proposed substation, as well as to understand the licensing process. In respect of programme, SSEN are looking to submit December 2021.

Actions:

1. SSEN to explore restoration opportunities with possible partners e.g. Loch Lomond and Trossachs National Park.
2. SSEN to identify if any peat extraction sites exist close to the development site.
3. SSEN to arrange a follow-up meet, prior to submitting the EA, with SEPA and prior to that meeting send the draft Peat Management Plan and EA Chapter to SEPA for their consideration.

Table 1: Response to Comments Raised in Alex Candlish's Email 19.10.2021		
No.	SEPA's comments	SSEN/ Ramboll response
1.	Proposed re-uses of excavated peat to dress slopes and shoulders around the substation platform, tracks and in reinstatement of the contractors' temporary compound are acceptable.	Noted.
2.	SEPA does not support or accept the use of peat in bunds or mounds due to the high likelihood of the peat drying out with resulting high carbon losses; this is due to the likely water losses to evaporation and runoff due to the peat projecting above the surrounding ground level. We discourage this as a re-use and would only accept under exceptional circumstances and with demonstration that the expected carbon losses would be avoided.	This is the reason we are looking at alternatives. The use of bunds or mounds had been proposed in an earlier Draft Peat Management Plan, produced by AECOM for SSEN, in December 2018. It was identified that this option was least preferred unless there are no alternatives.
3.	The substation location and red line boundary have both changed since the AECOM 2018 Peat Management Plan. The figures for volumes of peat that will be excavated and the volumes to be reused in specific ways must be updated to reflect the current layout and an updated PMP submitted in support of the application.	Noted – this work is currently underway in preparation for the EA submission.
4.	Does the temporary construction compound have to be excavated? Is it possible to create hardstanding using aggregate on top of a geotextile membrane instead?	Engineers are working on this detail at the moment and have said that some excavation may be required to achieve levels but if possible, they would look to raise levels using fill material laid over a geotextile.
5.	How do other site options compare to the current preferred site? Given the constraints of this site and the need for large depths of fill, do any of the other options have potential to be a better fit for the purpose?	We have looked at 8 different locations in the surrounding commercial forestry and undertaken a site selection exercise considering cost, technical and environmental criteria. Costs were comparable for all the options meaning technical and environmental criteria were the key considerations. The preferred site was selected as it scored the lowest for environment and technical. The other sites were discounted based on significant peat depths and technical constraints included topography and accessibility. SEPA queried if the substation could be moved slightly to the north west of its current position to avoid deeper areas of peat. SSEN confirmed, the topography in this location rises steeply and a watercourse is present (identified on 1:50k OS map). These factors would rule out a move to the north west.

Table 2: Key Discussion Points During Meeting		
No.	SSEN's Queries	Discussion
1.	Is it feasible to re-use the peat off-site (e.g. associated OHL project) for habitat restoration or would it be classified as waste?	SSEN/ Ramboll discussed the restoration hierarchy approach with the focus on best options for habitat restoration, closest to site, being the priority. SEPA suggested looking at NatureScot Bare Peat viewer – to identify locations closest to our site where restoration could be undertaken. Scottish bare peat viewer (arcgis.com) SEPA confirmed that off-site re-use of peat is possible – see licensing query (Line item No.4 below).
2.	The appropriateness of using surplus peat for ongoing restoration projects.	Yes, SEPA stated this is possible and is dependent on the project. Factors to consider include: • Transportation distance (will peat arrive in suitable condition). • Condition of peat on receptor site. • Presence of peat erosion gullies. SEPA noted that working with a previously forested site can be difficult due to brash (branches left behind after felling), and presence of ridges, furrows and drains. Forest to Bog restoration projects are most successful following surface smoothing to remove ridge and furrow topography, limiting ridges and furrow to ± 10 cm, and in parallel with drain blocking. SEPA suggested exploring restoration on areas of bare peat, erosion gullies and peat extraction sites. SSEN will progress contacting National Parks to explore peat restoration project opportunities and will investigate if there are any peat extraction sites in the area.
3.	If these options are viable, experience of how this could be transported to prevent adverse impacts on the characteristics of the peat (desiccation etc) (any previous examples of where this has been undertaken successfully).	SEPA confirmed there are no set criteria defining the distance peat can be moved. The key element is ensuring that the peat arrives at the receptor site in usable condition.
4.	Establish licensing options and the information required to obtain licenses to move peat to restoration sites.	Licensing is required for moving peat outside of redline boundary. The following would be required: • <u>waste transfer note</u>: This must be held by the haulier (waste carrier) who transports the excavated peat to the offsite receptor restoration site. Application forms Scottish Environment Protection Agency (SEPA)

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		• <u>waste management licencing exemption</u> for receptor site, for which there is a statutory 21 day turnaround from application submission to determination. Required to demonstrate either (a) ecological improvement or (b) agricultural benefit (in this case the former). Activities exempt from waste management licensing Scottish Environment Protection Agency (SEPA). See information on Paragraph 7 exemptions for reinstatement of peat on other construction sites or for peatland restoration; Paragraph 9 for land reclamation or improvement on post-industrial sites such as quarries or surface mines. Demonstrating Ecological Improvement: General discussion on Peat Condition Assessment and how it may link with the BNG assessment SSEN/ Ramboll is undertaking to deliver ecological enhancements. Discussion on Peat Condition assessment for receptor sites. CC sent across further information based on the Strath Caulaidh approach as an example and there was a general discussion on the use of this assessment and how it may link with our BNG assessment for the site. SEPA provided the Strath Caulaidh peatland condition assessment in the following draft HMP in Table 1 on page 4: https://portal360.argyll-bute.gov.uk/my-requests/document-viewer?DocNo=21286321. Requirements for Submission: • SSEN discussed that pre-consent submission could identify areas of potential restoration and identify where discussions had been held with stakeholders for possible restoration projects. • SEPA requested that landowner agreement in principle for receptor sites is provided in the pre-consent submission and any evidence of engagement in discussions on restoration projects with other partners, also be included. SSEN confirmed that the detail of restoration projects and securing agreement for receptor sites would not be available when the planning application is submitted. This detail would be progressed following submission.

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No.	SSEN's Queries	Discussion
		- SEPA stated they would likely require a pre-commencement condition that a legally binding agreement with the landowners of any off-site peat restoration sites is in place before construction starts. - SSEN/ Ramboll discussed that a portfolio of restoration options would be put forward as part of the PMP.
5.	SEPA's view on borrow pit restoration and option for spreading peat	Borrow pits were briefly mentioned in the discussion as a lower preference for restoration, as they provided less habitat enhancement. SSEN expressed that landfill would rather be avoided and in a situation where excess peat remained, could this be spread at the site? SEPA identified that any excess peat spread on the site should not smother existing vegetation, would need to be hydrologically connected with the water table (top 10cm) and would need to be re-vegetated – placement of vegetated turves could adopt a chequer board pattern to provide a seed bank if vegetated turves were in short supply.
6.	SEPA's view on the proposed SUDs design and its relationship with peat – preference/ issues	Ramboll queried whether a SUDs pond lining such as clay, to separate drainage water from the underlying peat, would be considered acceptable. SEPA's preference would be to not line the ponded areas, being preferable to maintain hydrological connectivity with site drainage and peat. This assumes the water entering the SUDs is not polluted. Ramboll clarified use of hydrocarbon interceptor to capture pollutants close to their source and before entering the drainage system and a hydrocarbon capture membrane would be used to line the SUDs as a secondary measure, that allows water to penetrate through to the peat but captures pollutants. Ramboll confirmed level of contamination is expected to be very low and would only arise because of accidental spills. SEPA affirmed their preference for SUDs not to be lined and to maintain connectivity with site drainage and underlying peat to help keep peat saturated. They confirmed that it would not be desirable to add a lining, such as clay to a low mineral environment.