

SSEN Transmission's Biodiversity Net Gain and Irreplaceable Habitat Off-Site Strategy for Bingally 400/132 kV Substation



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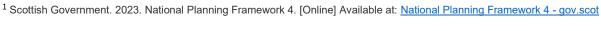
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1 Introduction

1.1 Background

- 1.1.1 Scottish Hydro Electric Transmission plc, 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.
- 1.1.2 SSEN Transmission is committed to protecting and enhancing the environment by minimising the potential impacts from their construction and operational activities. As part of this approach, SSEN Transmission has made commitments within its Sustainability Strategy to deliver 10% biodiversity net gain (BNG) and leave a positive legacy for nature on all projects gaining consent. Where this cannot be delivered on-site, SSEN Transmission must identify off-site opportunities for biodiversity enhancement.
- 1.1.3 In line with the requirements and guidance of Policy 3 of the Scottish Government's National Planning Framework 4 (2023) (NPF4), developers are obligated to ensure projects leave nature in a 'demonstrably better state than without intervention'1. This involves adhering to the NPF4 mitigation hierarchy:
 - Avoid: Remove impacts at the outset
 - Minimise: Limit direct and indirect impacts
 - Restore: Repair damaged habitats
 - Offset: Compensate for losses, with a preference for on-site measures
- 1.1.4 This document sets out SSEN Transmission's methodology for off-site BNG and irreplaceable habitats following application of the mitigation hierarchy throughout the development's design process.
- 1.1.5 With specific reference to theRevised Scheme, the Biodiversity Net Gain Assessment Report (Appendix F to the Bingally 400/132kV Substation Additional Information Report) identifies an Area-Based Habitats baseline measured in biodiversity units (BU) with 10% BNG figure of 1155.87 BU. Of which 1152.34 BU are capable of being delivered on the Revised Scheme Site. The remaining 118.52 BU will be delivered at locations remote from the Revised Scheme but within the Highland Council area, where at all possible, in accordance with the off-site BNG methodology set out in the following sections.





1.1

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2 References

The documents detailed in Table 2.1 - Scottish and Southern Electricity Networks Documents, should be used in conjunction with this document.

Table 2.1 - Scottish and Southern Electricity Networks Documents

Reference	Title
FC-NET-ENV-500 Biodiversity Net Gain Flowchart	
TEM-NET-ENV-508 Biodiversity Net Gain Assessment Report	
TG-NET-ENV-525 An Introduction to Biodiversity Net Gain	
TG-NET-ENV-526 Biodiversity Net Gain Toolkit User Guide	

3 Biodiversity Net Gain and Irreplaceable Habitat

3.1 Overview

- 3.1.1 Biodiversity Net Gain (BNG) is an approach to development that ensures natural habitats are left in a better state than they were before the development. This means that any development project must result in a measurable improvement in biodiversity.
- 3.1.2 Irreplaceable habitats (IH) are habitats which are technically very difficult or impossible to restore, recreate, or replace once destroyed. SSEN Transmission considers irreplaceable habitats within their network to be Ancient Woodland (categories 1a & 2a of the Ancient Woodland Inventory (AWI)); individual ancient or veteran trees; and blanket bog or raised bog in good or moderate condition. Any loss or deterioration of an irreplaceable habitat will be recorded by area (hectares) or number of trees to allow for bespoke compensation in line with relevant NatureScot standing advice2.
- 3.1.3 In response to the publication of NPF4 in February 2023, which steers planning policy towards tackling the climate and nature crises, SSEN Transmission produced a range of internal guidelines and methodology that aim to support delivery of biodiversity enhancement and irreplaceable habitat compensation. In May 2023, SSEN Transmission brought forward the commitment to deliver 10% BNG on all projects gaining consent. As such, SSEN Transmission is committed to delivering BNG on all major projects gaining consent and to leaving the natural environment in a better state than its baseline.
- 3.1.4 A Biodiversity Projects Toolkit has been developed by SSEN Transmission as a BNG calculation tool that builds on the DEFRA Biodiversity Metric version 3.13 and adapts it to suit the Scottish context. The Biodiversity Net Gain Assessment Report summarising the

Natural England. 2023. [Online] Biodiversity Metric 3.1. Available at: https://publications.naturalengland.org.uk/publication/5850908674228224



1.1

² NatureScot. 2024. [Online] Advising peatland and carbon rich soils and priority peatland habitats for development management. Available at: https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management

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- calculations and is appended to Bingally 400/132kV Substation Additional Information Report (refer to Appendix F).
- 3.1.5 SSEN Transmission, as a Transmission Operator (TO), is regulated by Ofgem. As part of this regulatory process, all funding for SSEN Transmission operations, including any nature commitments such as BNG / IH compensation, must be submitted as a funding request to Ofgem for each regulatory period. In the most recent funding cycle SSEN Transmission submitted a Sustainability Action Plan which included all aspects of Nature funding. As a regulated business, SSEN Transmission is legally obligated to deliver on the nature commitments made.

Within the framework of this funding mechanism, SSEN Transmission will, therefore, look to fund appropriate development works, capital works, ongoing maintenance and/or adaptive management where a project opportunity exists that meets the business commitment to deliver 10% BNG and IH.

4 Methodology for Biodiversity Units and Irreplaceable Habitat Compensation

4.1 Off-Site Biodiversity Enhancement

- 4.1.1 Off-site habitat creation and enhancement is only required when all options for on-site BNG requirements have been considered, and insufficient on-site opportunities exist. In these circumstances off-site habitat creation and enhancement will be undertaken. Compensation is targeted at delivering biodiversity net gains that that create and improve natural habitats.
- 4.1.2 SSEN Transmission will complete baseline surveys of potential sites to be considered for offsetting that deliver Biodiversity Units. The steps SSEN Transmission will take include:
 - 1. Site Identification and Initial Assessment:
 - Identify potential sites for biodiversity compensation, where possible, within the Highland Council planning authority area
 - Conduct an initial assessment to determine the suitability of each site
 - The approach to landscape and restoration management is set out in <u>Section 4.3</u>
 - 2. <u>Habitat Classification and Condition Assessment:</u>
 - Classify each individual habitat feature into UKHab-based types as listed in the SSEN Transmission Biodiversity Projects Toolkit V3.0
 - Perform a Biodiversity Condition Assessment of each habitat feature, using Biodiversity Metric 3.1 Habitat Condition Assessment criteria, within the site boundary, as agreed with SSEN Transmission's internal Nature Team and landowner



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4.2 Bespoke Compensation for Irreplaceable Habitat

4.2.1 SSEN Transmission provides bespoke compensation for peatland (in good or moderate condition), Ancient Woodland (categorised as 1a and 2a on the AWI), and individual ancient and veteran trees restoration, and where recognised, in line with NatureScot standing advice45.

1. Peatland:

- o Identify peatland restoration sites that, for open hill peatland restoration, aligned with the eligibility criteria for Peatland Action and Peatland Carbon Code67.
- SSEN Transmission is committed to explore Forest to Bog (F2B) restoration opportunities as, due to practical considerations, funding options can be limited for landowners and partners. Forest to bog restoration is an evolving practice and SSEN Transmission will work with key partners to identify Forest to bog opportunities and deliver restoration utilising the most relevant and progressive techniques to restore these vital bog areas89
- Conduct surveys and develop restoration/enhancement plans
- The approach to landscape and restoration management is set out in Section 3.3

2. Ancient Woodland and Ancient and Veteran Trees:

- Identify Ancient Woodland sites (1a and 2a AWI or sites that should be included under this categorisation) and ancient and veteran trees and sites where Ancient and Veteran Trees (AVT) options exist.
- Conduct surveys and produce reports on the condition of the sites.
- Develop and implement restoration/enhancement plans with long-term management objectives.
- The approach to landscape and restoration management is set out in Section 3.3.

4.3 Outline Landscape Management Plan

SSEN Transmission will work with landowners to design an outline landscape management plan that delivers a biodiversity uplift and / or restoration of irreplaceable habitat on the

1.1

https://www.nature.scot/doc/peatland-action-technical-compendium-restoration-8-forest-bog-restoration

⁹ IUCN. 2024. Forest to Bog Restoration - Demonstrating Success. Available at: www.iucn-uk-peatlandprogramme.org



⁴ NatureScot.2023. [Online] A guide to understanding the Scottish Ancient Woodland Inventory (AWI). Available at: https://www.nature.scot/doc/guide-understanding-scottish-ancient-woodland-inventory-awi

⁵ NatureScot. 2024. [Online] Advising peatland and carbon rich soils and priority peatland habitats for development management. Available at: https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management

⁶ NatureScot. 2025. [Online] Peatland Action. Available at: https://www.nature.scot/peatland-action-processing-and-assessing-applications

⁷ IUCN. 2025. [Online] Peatland Code. Available at: https://www.iucn-uk-peatlandprogramme.org/peatland-code-0

⁸ NatureScot. 2025. [Online]. Peatland ACTION - Technical Compendium - Restoration - 8 Forest to bog restoration. Available at:

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site, in line with the SSEN Transmission's BNG Guidance and Biodiversity Toolkit V3.0. The steps include:

1. Develop Management Objectives:

- Define clear management objectives aimed at enhancing biodiversity on the site
- Ensure objectives align with SSEN Transmission's BNG Guidance and Biodiversity Toolkit V3.0, where relevant

2. Management Actions:

- Outline specific management actions required to achieve the biodiversity uplift, or condition enhancement
- Include actions such as habitat restoration, creation, and enhancement

3. Monitoring and Reporting:

- Develop a monitoring plan to track the progress of the management actions
- Establish reporting protocols to provide regular updates to the SSEN Transmission and relevant stakeholders

4. Legal Agreement:

 SSEN Transmission propose to put in place agreements with partners to ensure the long term stewardship of the land

5 Exploring Nature opportunities

- 5.1.1 A range of projects are being explored with local and strategic partners to identify suitable sites for biodiversity enhancements and IH compensation. These projects will involve details of baseline habitat types and creation or enhancement proposals. SSEN Transmission is committed to the successful delivery through ongoing monitoring and maintenance of these projects. The proposed offsetting projects will be located within the Highland Council area and this will allow the Revised Scheme to achieve a minimum 10% BNG and compensate for IH.
- 5.1.2 To date SSEN Transmission have engaged with strategic national stakeholders and local landowners. At this stage, engagement includes discussions about what sites are available and what kind of partnership could be established within the Highland Council area to ensure an appropriate geographical spread of biodiversity enhancement and IH compensation across the affected region. Biodiversity and IH sites are chosen due to their location and their potential to provide strategic and holistic biodiversity enhancement for the area, and where applicable, landscape scale restoration.

5.1.3 Examples of SSEN Transmissions commitment to nature:

 In December 2024, SSEN Transmission became the first energy company to partner with nature charity, SCOTLAND: The Big Picture, to help facilitate nature restoration efforts in the north of Scotland. The partnership will help SSEN Transmission deliver its



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- nature commitments through supporting the charity's Northwoods Rewilding Network, a Scotland-wide chain of landholdings which are all committed to nature restoration
- O In order to deliver the required Biodiversity Enhancement for two infrastructure projects located in Loch Lomond and the Trossachs National Park, SSEN Transmission has partnered with RSPB to enhance their Inversnaid Nature Reserve. The partnership will implement a 10-year restoration and herbivore management strategy aimed at restoring natural habitat diversity and reducing pressures from wild herbivores across an area some 218 hectares. Through controlled herbivore management, SSEN Transmission and RSPB aim to create a healthier, more balanced ecosystem that supports native species such as Black Grouse, Golden Eagles, and the scarce Yellow-ringed Carpet moth
- In 2023/24, SSEN Transmission supported the completion of 42.5 hectares (ha) of native broadleaf woodland planting at Borralan, north of Ullapool and SSEN Transmission are on track to complete 127ha of predominantly native woodland planting at Achlain near Dalmally
- SSEN Transmission have also supported control of invasive non-native rhododendron in North Argyll, supporting the recovery of native vegetation

6 Conclusion

This methodology ensures a structured approach to delivering off-site BNG and IH compensation, aligning with National and SSEN Transmission's guidelines and requirements. By following these steps, SSEN Transmission will achieve a measurable improvement in biodiversity, ensuring that natural habitats are left in a better state than they were before the development

7 Revision History

No	Overview of Amendments	Previous Document	Revision	Authorisation
01 New Document Created		N/A	1,00	R Baldwin
02				

