SSEN Transmission's Overhead Line Proposal East of Dalmally

We would like to thank the Dalmally community and local MSP for Argyll and Bute, Jenni Minto, for taking the time to meet with our team to discuss proposals to construct a new overhead line from Creag Dhubh to land adjacent to the east of Dalmally, during our meeting at Dalmally Community Centre on Monday 4 October.

We recognise the strength of local opposition to the introduction of new transmission towers in the local area, and believe there is a degree of misunderstanding about our actual proposals, including several false claims made in the change.org petition.

We fully accept that there will always be some members of the community opposed to new infrastructure in its entirety, in part, we believe, due to the proximity of the existing SP Energy Networks transmission line that runs through the village.

We believe it is important that the community is supported to take an informed view of our plans. By setting out the facts associated with our proposals, we hope this will allow the community to take a considered view of our proposals and in doing so, ensure any representation to our forthcoming Section 37 Planning Application is accurate and reflective of our proposals.

We have therefore prepared the following 'Frequently Asked Questions' to try to address local concerns and to help ensure the community and wider stakeholders have a factual understanding of our proposals.

Frequently Asked Questions

1. How close to the village is the proposed line?

We recognise there is a lot of anxiety locally about the perceived impact and proximity of our proposed overhead line to Dalmally. We would like to reassure the local community that our proposals have been carefully developed to avoid close proximity to Dalmally and local properties in the area.

Following community and stakeholder feedback during the development of the project, the proposed overhead line now runs south of the village connecting east of Dalmally, avoiding crossing the Strath of Orchy which we were asked to avoid following consultation on our initial preferred route back in 2018. As a result of the fundamental change in the project design, there has been a significant reduction in the proximity and impacts of our proposed infrastructure on the local community:

- The number of properties located within 500 metres of the overhead line has reduced from 33 to 5 when compared to our original preferred route from 2018 – a reduction of 85%.
- The closest property in the area to the overhead line is 395m away.
- Previous concerns regarding the preferred route from 2018 included the crossing of the A85 and proximity to the B8077 Stronmilchan Road. The proposed overhead line now runs over 1km away from the A85, avoiding the B8077 entirely.
- The overhead line is around 1km away from all properties in Dalmally village, including the school, which is 922m from the proposed overhead line.

2. Has community feedback been considered?

Throughout the development of the project, we have sought to consider local and wider stakeholder feedback at every stage of consultation.

- The new proposed line, introduced in September 2020, was created in direct response to community feedback to our previous proposal, which asked us to look at both an undergrounding option and for the line not to cross the village at the Strath of Orchy.
- As such, we spent two years investigating feasible underground cabling solutions across the Strath of Orchy.
- We also identified an alternative overhead line connection option which connects to the east of the village rather than via the west into Dalmally switching station, reducing its overall impact on, and proximity to, the local community.
- In September 2020[1] we presented this new proposed route, along with the original, and undergrounding options, for further public consultation.
- This additional consultation was a direct result of listening and reacting to local community feedback strongly objecting to the initial proposed overhead line alignment crossing the Strath of Orchy.
- In our September 2020 consultation, 38% of responders selected the undergrounding option as their preference and 24% selected the new proposed overhead line solution.
- 0% of responders selected the originally preferred option, with the remaining 38% of responders not selecting an option.

3. Why did you not progress with undergrounding when it was the most popular option with the Community?

The option to underground the overhead line was assessed by one of our delivery contractors and during their assessment of the potential undergrounding, there were several issues encountered that led to this option being discounted:

1. The underground cable would be installed in an area of high flood risk with pollution risks to Loch Awe due to the presence of deep peat in the area. This would be exposed during construction and could be disturbed during a flood event, risking a pollution incident.
2. The materials required to surround an underground cable to attempt to provide a suitable backfill to allow it to operate at the correct parameters, also carry a significant risk of pollution should a flood event disturb these materials and deposit them in Loch Awe.
3. The nature of the ground conditions presents significant challenges to maintain the cable in position during operation as these conditions can allow the cable to move, causing the cable joints to be put under strain and ultimately risk faults during the operational phase. This would disrupt the operation of the cable and is not an acceptable risk for SSEN Transmission, risking pollution to Loch Awe during any remedial works to repair cable damage and reducing the reliability of the Transmission Network.
4. The safety of the cable operation was also highlighted with placing this in a known flood plain presenting significant operational issues.

[1] https://www.ssen-transmission.co.uk/media/4625/ssen-creag-dhubh-to-dalmally-argyll-12pp-24126-artwork-web.pdf

5. Concerns were highlighted with infrastructure (road, railway) crossings; terrain and gaining access for works, both during construction and operation.

The cumulative impacts of these high-risk issues and consideration of other stakeholder feedback, including that of the statutory consultees, led to the new proposed overhead line solution becoming our preferred route.

In progressing the new proposed overhead line route, we were also able to mitigate the following concerns raised by our statutory stakeholders:

- Addressing Argyll & Bute Council's previously expressed concerns over visual impacts within the Strath of Orchy and head of Loch Awe associated with the initial overhead line proposal.
- NatureScot agreed this option appears to minimise landscape impacts and noted this option lies outside of the Special Protected Area (SPA) designated for the protection of birds and, as such, no likely significant effects are foreseen in terms of the Habitat Regulations.

Full details regarding our decision are outlined within the Report on Consultation, November 2020[2].

4. Have you considered undergrounding the new preferred route?

No. Undergrounding would generally only be considered when a landscape and visual assessment identifies substantial adverse impacts.

The assessment of effects is completed using established Environmental Impact Assessment guidance, and standard accepted industry practice. Further details can be found in our EIA Scoping Report[3].

As set out below, there are also a number of constraints associated with the use of underground cables within the Transmission System which limit its use:

Economics - Underground cable is significantly more expensive than overhead line solutions. Typical ranges of the ratio of cost difference lie in the range of 5:1 – 12:1. As the costs of transmission infrastructure are ultimately recovered through GB consumers' electricity bills, cost is a material consideration in the assessment of our infrastructure developments, in line with our licence obligation to develop an economic, efficient and coordinated network.

Security of Supply - For overhead lines, many faults are temporary and only last a few seconds. Sustained faults are usually relatively easy to find and repairs can normally be carried out within 24 hours. For underground networks, whilst fault rates are generally lower, repair times are considerably longer where three weeks would be considered the minimum time required, running into months in some cases. Repair costs are also considerably higher.

Environmental - Transmission cable installations can have a significant effect on the environment during construction and restrict use of land after installation. Underground cable installations

[2] https://www.ssen-transmission.co.uk/media/4939/report-on-consultation-creag-dhubh-to-dalmally-275kv-connection-november-2020-web-version.pdf
[3] https://www.ssen-transmission.co.uk/media/5867/creag-dhubh-to-dalmally-275-kv-connection_eia_scoping_report_issue.pdf

generally take up to five times longer to complete and cause more disturbance and environmental impacts to hydrology, habitats, flora, fauna and land use.

In terms of land take, a 275kV underground cable would require 12 parallel cables, with 3m separation between circuits (36m in total), with a construction working width of approximately 50m. The ground disturbance associated with an overhead line is likely to be significantly less.

On-going land use above underground cables has to be restricted, whereas the operational corridor for an overhead line can be allowed to develop with valuable habitats such as native scrub.

As part of our assessment of this route there has not been a significant adverse impact identified to a scale which we feel would require the use of underground cable to mitigate, therefore, based on the above constraints the use of underground cable has not been taken forward as our preferred option. An overhead line in our view and on balance, presents a better overall solution for both construction and operation, as well as providing better cost benefit to the end consumer.

5. Does the new preferred route involve more transmission towers than the originally preferred option from 2018?

No. Our initial preferred route from 2018, from the proposed Creag Dhubh substation crossing the Strath of Orchy and connecting into SP Energy Networks existing switching station involved 49 transmission towers.

Our new preferred overhead line route from Creag Dhubh substation connecting to the east of Dalmally, would have 47 transmission towers.

6. Does the new preferred route threaten endangered species?

No. Part of our licence and legal obligations is to identify endangered species living close to our assets during construction and operation and where necessary include mitigation to protect them.

Protected species surveys have been undertaken to inform the routeing and alignment processes and the Environmental Impact Assessment (EIA). We develop mitigation and employ Species Protection Plans to ensure species are not subject to significant effects from construction or operation of the overhead line. Further information on the surveys undertaken and the results can be found in the publicly available Scoping Report and the associated figures – available here: Scottish Government - Energy Consents Unit - Application Details[4]

The EIA will be made publicly available as part of our Section 37 application.

7. What will the Environmental Impact Assessment (EIA) include?

As part of our Section 37 Planning Application, we will provide a detailed Environmental Impact Assessment, which will robustly assess the impacts of our proposals on the surrounding environment, landscape and local properties. This information will be publicly available.

In December 2020, we published our EIA Scoping Report[3] describing the proposed content of the EIA Report, which will also include any requirements provided by the Scottish Government in its EIA Scoping Opinion, once received.

[4] https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00002199

We have proposed that the EIA includes assessment of the following:

- Landscape Character and Visual Impact
- Biodiversity
- Ornithology
- Cultural Heritage
- Traffic and Transport
- Hydrology, Hydrogeology, Geology, and Soils
- Forestry
- Noise and Vibration

The EIA Scoping Report and supporting documents is available on the Scottish Government Energy Consent Unit website http://www.energyconsents.scot/ under case reference ECU00002199.

8. Why is the amended overhead line still in proximity to the village of Dalmally, can it not be routed further west?

Alternative suggestions proposed by the Dalmally community during the most recent consultation and meeting had already been considered during the options assessment process, including taking the connection out via Inveraray to Sloy and Inverarnan and utilising subsea connections from Crossaig and Carradale.

The option to connect via Inveraray towards Sloy and Inverarnan was discounted due to the following challenges being identified:

- Our engineering and construction teams raised concerns over the steep and challenging terrain on the route to Sloy and Inverarnan, with this raising significant health and safety concerns over the ability to safely design, construct and then operate the asset.
- This option would encroach on the Loch Lomond and Trossachs National Park and would have the potential to impact on this national designation.

Impacts on the Glen Etive and Glen Fyne Special Protection Area (SPA) for golden eagles also led to the alternative options proposed being discounted given the international protected designation of these areas.

Finally, options to utilise subsea cables were ruled out during the Cost Benefit Analysis, primarily due to the significant cost associated with this option and our regulatory requirement to develop an economic, efficient and coordinated network.

9. Why can you underground cables in Loch Lomond and Trossachs National Park but not at Dalmally?

From an engineering perspective, the undergrounding of cables in Loch Lomond and the Trossachs is achievable due to the presence of suitable ground conditions and topography in the area which allowed these works to be carried out.

Additionally, with regards to the works in Loch Lomond and Trossachs National Park, these are being undertaken through funding made available by the energy regulator, Ofgem, to all three GB Transmission Owners, to address the visual impact of historical overhead transmission infrastructure

in National Parks and National Scenic Areas. This funding cannot be applied for and used to mitigate the visual impact of new or planned infrastructure projects, or for any projects out with qualifying designated landscapes.

10. Are you progressing the cheapest option?

In Summer 2020, we consulted on three options for the Creag Dhubh – Dalmally connection**:**

Option 1: an overhead line to the existing Dalmally substation (*identified as the most economic solution*)

Option 2: a combination of overhead line and underground cable to the existing Dalmally substation. (*This had significantly increased whole project costs compared to Option 1)*

Option 3: an alternative overhead line connection location east of Dalmally and new switching station. (*This had the highest whole project costs at the time due to the requirement for a new switching station to be built)*

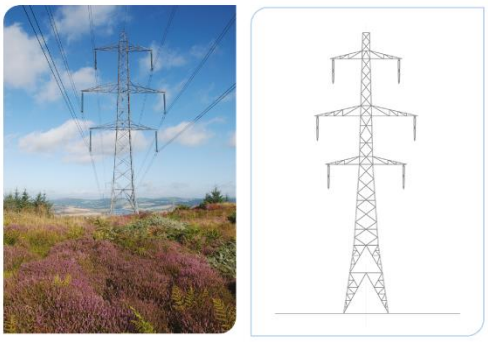
We selected Option 3 as our preferred option, despite it having the highest associated whole project costs at the time, primarily due to the environmental and engineering challenges associated with Option 2, and the local community and stakeholder objections received regarding Option 1.

However, the removal of the proposed Glen Lochy switching station, following a review of the system requirements, has subsequently reduced the cost of our preferred option. This is now comparable in cost to our original overhead line option and is more cost effective than the underground cable option thus reducing the impact to the GB electricity bill payer.

Costing information relating to the three options considered is available via the Consultation Document from 2020[5].

11. Will the towers be nearly double the height of the existing Scottish Power towers that run through the village?

No, our towers will be 50 metres on average, comparable in size to the existing SP Energy Networks towers in the area.



Our proposed 275kV towers

[5] creag-dhubh-to-dalmally-275kv-connection-consultation-document-web-version.pdf (ssen-transmission.co.uk)

12. Will there still be a new additional substation close to Dalmally?

No. Following consultation in July 2021 and further discussion with SP Energy Networks, it has been determined that the previously proposed Glen Lochy switching station (to the east of Dalmally) is not currently required and has been removed from our plans, with a tee in (direct connection) to the existing overhead line now proposed instead. It should be noted that, dependent on generation requirements, a switching station may be required to replace the tee in the future.

Creag Dhubh Substation does remain a part of our proposals, located around 10km away from the village. This site will not normally require round the clock working (either during or post construction) from our operatives as has been suggested, nor will it normally be lit up at night. Works will only be undertaken out of hours at Creag Dhubh should there be specific works such as commissioning of equipment or responding to maintenance or fault issues that require this. In these instances, it is noted the substation will be lit as required to provide a safe working environment for our staff and our contractors.

13. How does your new SSEN Transmission overhead line relate to the Cruachan 2 Drax Project?

It doesn't. Whilst Drax are the owner and operator of Cruachan pumped storage hydro scheme, the existing 275kV transmission line is owned and operated by SP Energy Networks.

As such, any proposed connections to the network at Cruachan or Dalmally would be assessed by SP Energy Networks as the host Transmission Owner. We would also undertake our own network assessments to consider any new connections, as an affected Transmission Owner. We work closely with SP Energy Networks as a neighbouring Transmission Owner to consider the impact of generation connections on both networks within this area.

14. Will this project affect the local broadband?

No. Premises which do not already have full fibre superfast broadband connections are instead usually connected to a local broadband cabinet by copper wire, which is the case in Dalmally. Broadband speeds are dictated by the distance of properties from this cabinet and are not related to the proximity of the overhead transmission line. More information can be found at www.scotlandsuperfast.com/

15. Will train services will be affected by construction of the overhead line?

No. Construction of our preferred overhead line would not result in disruption to the train services at Dalmally railway station.

16. What will be the visual impact of the proposed line on the local environment?

The visual impact will vary depending on your viewpoint of the preferred alignment. We assess the landscape and visual impact from the outset to inform the alignment design and have undertaken studies that identify visual receptors and model the alignment based on tower size and their ground position.

- We are currently assessing the visual impact, based on the information collated through the routing and alignment processes. The EIA chapters are being drafted and will include a detailed assessment and technical appendix.
- The assessment includes any impacts on local properties, as well as visual representations of our proposals from key local locations. This will form part of our Section 37 planning application.
- Where possible, we aim to site towers to minimise the impact on views from residential properties and cultural heritage features.
- To reduce visual impacts as far as possible, we look, where possible, to position towers where their outline is absorbed by the landscape features behind the tower, such as hills and forestry (known as a backcloth). The EIA may identify mitigation measures such as moving towers within a pre-determined limit or tree planting, to minimise visual impacts.
- Taking into account a holistic view of all environmental (including landscape, economic, and social) factors, we believe these will demonstrate an acceptable impact on the local landscape.

We also have a 3D visualisations portal, which allows stakeholders to view what our proposed line will look like from various local viewpoints:

https://3dwtech.co.uk/dashboard/ssen/dalmallylt29/portal-update/

If there are additional viewpoints you are interested in, or if you would like us to send you snapshots from particular locations, please contact our Community Liaison Manager (contact details at the end of this document).

We will be hosting a drop-in session at Dalmally Community Centre next month, providing an opportunity for local community members who may not have access to our online 3D visualisation portal to view our model in person, further details at the bottom of this document.

17. Would there be any local community benefit?

As an economically regulated company, we are required to be mindful of all GB energy bill payers and are currently unable to offer monetary benefits such as Community Benefit Funds in the same way as windfarms.

We will continue to work constructively and openly with the local community and wider stakeholders as we take forward this project of critical national importance to support the transition to net zero emissions.

We are actively committed to maximising opportunities to support local businesses and the economy throughout the construction phase and have strengthened the commitment with our main contractors to increasingly consider using the local supply chain where possible.

As part of our sustainability commitments, we have committed to deliver biodiversity no net loss on all our transmission projects from April 2021, working towards biodiversity net gain for all projects consented from 2025. This means we will leave the local biodiversity no worse than we found it.

We are also committed to deliver compensatory replanting of trees that require felling during the construction of our projects, looking to use native species where possible, further supporting biodiversity. As part of this, we are actively exploring working with local organisations on our compensatory planting commitments.

We're also increasing our efforts to look at ways we can offer additional benefits which would ensure a lasting positive legacy for local communities and are keen to hear your views as we engage further on this.

18. How can I provide feedback as part of the planning process?

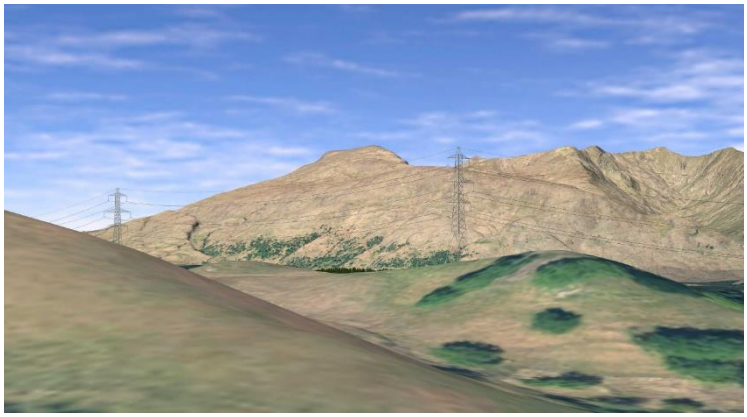
We are due to submit a Section 37 application for the Creag Dhubh – Dalmally overhead line to the Scottish Government Energy Consents Unit before the end of 2021. We will also submit our Town and Country Planning application to Argyll and Bute Council for the Creag Dhubh Substation during this time.

We will ensure local stakeholders are made aware of when applications are submitted and how they can make representations.

Next Steps: A Community Drop-in Session ahead of our Planning Application Submission

During the recent Dalmally Community Centre meeting, some local residents told us they wanted to see printed stills from our online visualisation portal and for our team to be there to discuss these with them. This is due to some residents having limited access to broadband.

We also committed to providing more details and seeking views on the removal of the Glen Lochy (Succoth Glen) switching station from our proposals.



Screenshot taken from the 3D visualisations portal

Therefore, we will be holding a pre-planning application submission drop-in session for local stakeholders who wish to view visualisations and speak to the team in person regarding the current proposals. The session will be held on:

Tuesday 23 November 2021
1pm – 7pm
Dalmally Community Centre

As Covid-19 guidance continues to relax and due to the drop-in format, there will be no requirement to register in advance for this event and local residents can drop by to speak to the team and view our 3D model at any point during the above date and times.

Keeping in Touch & Providing Feedback

If you have any additional questions which have not been addressed here please do not hesitate to contact our Community Liaison Manager via email, phone, or letter.

Paper copies of the additional information referred to in this document will be available for reference at the drop-in session mentioned above.

Feedback from residents suggests they want to continue to be updated by direct emails and letters and for paper copies of information to be posted to the Community Centre and to local councillors.

If you are concerned that you are not on our email or postal register, or would indeed like to be removed from these, please contact Caitlin Quinn also.

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