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LT234 GLEN STRATHFARRAR VISTA BIODIVERSITY NET GAIN ASSESSMENT

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BIODIVERSITY NET GAIN ASSESSMENT

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EXECUTIVE SUMMARY

Ramboll was commissioned by Scottish and Southern Electricity Networks (herein referred to as 'SSEN Transmission'), operating under license as Scottish Hydro Electric Transmission Plc (herein referred to as 'SHE Transmission') to undertake a Biodiversity Net Gain (BNG) assessment for a development (herein referred to as the 'proposed development') located in Glen Strathfarrar, approximately 40 kilometres (km) west of Inverness in the Scottish Highlands. The location of the proposed development and the operational corridor used for the assessment, the proposed development¹ is shown in **Appendix 1, Figure 1**.

The proposed development forms part of Project VISTA (Visual Impact of Scottish Transmission Assets); a fund made available by Ofgem for electricity transmission owners to mitigate the impact of existing electricity infrastructure on the visual amenity of nationally designated landscapes. SSEN Transmission has identified a section of overhead line (OHL) near Glen Strathfarrar as offering the opportunity to deliver visual impact enhancement, while meeting with the other core principles of Project VISTA; namely to limit adverse socioeconomic and environmental impacts and offer best value for money. The proposed development consists of:

- Removal of a section of existing OHL and supporting steel lattice towers in Glen Strathfarrar, which falls within the Glen Affric to Strathconon Special Protection Area (SPA), Strathglass Complex Special Area of Conservation (SAC), Glen Strathfarrar Site of Special Scientific Interest (SSSI) and Glen Strathfarrar National Scenic Area (NSA);
- Installation of a new section of underground cable (UGC) to replace the section of removed OHL;
- Construction of a new cable sealing end (CSE) compound including a new CSE steel lattice tower at the eastern end of Glen Strathfarrar;
- Construction of a new section of OHL to connect the existing OHL at Tower 14 (T14) into the new CSE tower;
- Construction of a permanent access track to provide access to the new CSE compound;
- Installation of a new section of UGC between the existing and proposed Deanie Substation; and
- Associated temporary works to enable the decommissioning and construction process.

BNG is a process whereby development leaves biodiversity in a measurably better state than before the development and construction work started. This report is underpinned by the SSEN Transmission Biodiversity Project Toolkit Excel Sheet (herein referred to as 'the Toolkit') following the SSEN Transmission Biodiversity Net Gain Toolkit User Guide (2022)². This has been achieved through calculating the biodiversity change as a result of the proposed development and including recommendations to assist the proposed development to minimise biodiversity loss and maximise positive effects for biodiversity. The aim of this report is to provide the results of the BNG assessment in relation to the associated decommissioning and construction works and post-development plans for the proposed development.

¹ The Site used for this BNG assessment was drawn around the permanent losses of the proposed development. It should be noted that habitats directly impacted by temporary loss that are assumed to reinstate to their original habitat and condition within two years have not been included in this assessment.

² Scottish and Southern Electricity Networks Transmission, 2022. TG-NET-ENV-526. Biodiversity Net Gain Toolkit User Guide. Rev 2.00

Irreplaceable Habitats

Irreplaceable habitats are quantified differently to non-irreplaceable habitats. Irreplaceable habitats are acknowledged for their particular importance and therefore appropriate mitigation has been identified for any impacts on these habitats. Separate Toolkits have been used to calculate permanent impacts to irreplaceable habitats.

SSEN Transmission consider irreplaceable habitats within their network to be Ancient Woodland (categories 1a and 2a of the Ancient Woodland Inventory), ancient or veteran trees, blanket bog or raised bog in good or moderate condition. As per the SSEN Transmission BNG Toolkit User Guide, irreplaceable habitats are measured in hectares (ha) rather than Biodiversity Units (BU). The BNG assessment shows that with the proposed post-development plans (**Appendix 1, Figure 2**), a total of 0.06 ha of moderate condition irreplaceable blanket bog will be permanently lost to the proposed development. This is due to the construction of the permanent access track. It is therefore recommended that the loss of blanket bog is compensated for using a 1:10 compensation ratio. A further 0.12 ha of irreplaceable blanket bog will be lost during the installation of the UGC. It is assumed that irreplaceable blanket bog in good condition will be reinstated in moderate condition, and that irreplaceable blanket bog in moderate condition will be reinstated in poor condition. In addition to the reinstatement of this habitat, it is recommended that the loss of blanket bog due to the installation of the UGC is compensated for using a 1:1 ratio.

Non-Irreplaceable Habitats

In terms of non-irreplaceable habitats within the proposed development, the BNG assessment shows that, with the proposed post-development plans (**Appendix 1, Figure 2**), for habitats impacted by the construction of the CSE compound, permanent access tracks and temporary construction compound will lead to a Net Loss of -80% (-16.85 BU). For habitats within the 2.5 m excavation zone required for the installation of the UGC there will be a Net Loss of -66% (16.88 BU). It is recommended that habitats in the wider Site Boundary are enhanced to mitigate for losses within the proposed development.

1. INTRODUCTION

1.1 Background

Ramboll was commissioned by Scottish and Southern Electricity Networks (herein referred to as 'SSEN Transmission'), operating under license as Scottish Hydro Electric Transmission Plc (herein referred to as 'SHE Transmission') to undertake a Biodiversity Net Gain (BNG) assessment for a development (herein referred to as the 'proposed development') located in Glen Strathfarrar, approximately 40 kilometres (km) west of Inverness in the Scottish Highlands. The location of the proposed development and the operational corridor used for the assessment, the proposed development³ is shown in **Appendix 1, Figure 1**.

1.2 The Proposed Development

SSEN Transmission would carry out the installation of the proposed underground cable (UGC) under the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 Class 40(1)(a). The proposed cable sealing end (CSE) compound and tower are considered to fall under the Overhead Line (Exemption) (Scotland) Regulations 2013, and subject to the terms of the Regulations, will not require Section 37 consent⁴, however, the impacts of this construction on habitats within the Site Boundary have been assessed within this BNG assessment. The CSE compound is assumed to be approximately 39.5 m by 29 m, and a Type 1 permanent access track approximately 500 m in length would be constructed to provide access to Tower 13R and the CSE compound. It is assumed that all habitats that fall within the footprint of the CSE compound and permanent access track will be permanently lost to the proposed development, with the post-development habitat assumed to be Urban – Developed land; sealed surface.

The proposed development is illustrated in **Appendix 1, Figure 1**. For clarity, each element of the proposed development has been categorised according to the applicable planning regulations they fall under; separate BNG calculations have been undertaken for each element. The proposed development consists of the following elements:

- The Electricity Act (Scotland) 1989 (Section 37):
 - The construction and operation of a new CSE compound to house both transmission (132 kilovolt (kV)) and distribution (33 kV) elements, approximately 350 m east of Deanie Lodge;
 - The construction and operation of a new terminal tower (Tower 13R) within the CSE compound; and
 - The construction and operation of the access track and associated temporary laydown/compound area to serve the new terminal tower and compound.
- The Town and Country Planning (General Permitted Development) (Scotland) Order 1992:
 - The installation of a 132 kV underground cable (UGC), approximately 3.75 km in length between the proposed CSE compound and the proposed Deanie Substation; and
 - The installation of a 33 kV UGC, approximately 3.35 km in length between the proposed CSE compound and the existing distribution network.
- The Overhead Lines (Exemption) (Scotland) Regulations 2013:
 - The installation of a replacement section of overhead line (OHL) between Tower 13R and the existing Tower 14, approximately 180 m in length; and

³ The Site used for this BNG assessment was drawn around the permanent losses of the proposed development. It should be noted that habitats directly impacted by temporary loss that are assumed to reinstate to their original habitat and condition within two years have not been included in this assessment.

⁴ Secretary of State, 1989. Electricity Act 1989. [Online] Available: [Electricity Act 1989 \(legislation.gov.uk\)](https://legislation.gov.uk/ukpga/1989/29/section-37)

- The decommissioning and removal of the existing OHL between Deanie Substation and Tower 13 (approximately 3.75 km of 132 kV and 33 kV OHL, alongside the decommissioning and removal of Towers 1 – 13.

The 132 kV and 11 kV UGC will connect into the proposed SSEN Transmission Deanie Substation, which is currently identified to be located approximately 400 m south-west of the existing substation near Tom a' Mhein hillock. The substation is subject to a separate planning application. The 33 kV UGC will connect into the existing distribution line via a wood pole just north of the existing Deanie Substation.

1.3 BNG Approach

The process of BNG is governed by a set of UK good practice principles⁵ along with industry guidance which outlines the practical implementation of the principles⁶. The key principle is the application of the mitigation hierarchy, which sets out that development should first avoid disrupting/damaging/removing biodiverse habitats, then mitigate/minimise impacts, and restore/reinstate habitats. If any residual detrimental aspects to biodiversity are produced once the mitigation hierarchy has been applied, biodiversity offsetting will be used to compensate for these. The principles require use of a biodiversity metric to assess and quantify net biodiversity change.

The BNG assessment has been undertaken using the SSEN Transmission Toolkit published in 2019 and based on the Natural England's metric (the Biodiversity Metric version 3.1⁷). The SSEN Transmission Toolkit calculates the Biodiversity Units (BU) before, during and after works on a specific development site, and assesses whether a development will achieve Net Loss, No Net Loss or Net Gain. Use of the Toolkit follows industry-published best practice and SSEN Transmission's BNG Toolkit User Guide⁸. The aim of this report is to provide the results of the BNG assessment in relation to the proposed development and the associated construction works and post-development plans for the proposed development.

1.4 Policy and Legislation

BNG is a process whereby development leaves biodiversity in a measurably better state than before the development and construction work started. In February 2023, the Scottish Government adopted the fourth version of the National Planning Framework (NPF4)⁹ against which all planning applications will be assessed. The NPF4 includes policy requirements for developers to '*conserve, restore and enhance biodiversity*' and '*achieve significant biodiversity enhancements*'¹⁰.

1.5 Local Plan Policy

The proposed development is situated within the area covered by the Highland Council. The current Highland Nature Biodiversity Action Plan (BAP) (2021-2026)¹¹ outlines Highland Council's vision to '*conserve and enhance important habitats and species*'. One of the commitments outlined within the BAP (Commitment 1.1) is to '*move towards implementation of a Biodiversity Net Gain system*'

⁵ CIEEM, CIRIA & IEMA, 2016. Biodiversity Net Gain: Good practice principles for development [online]. Available at: <https://cieem.net/wpcontent/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>

⁶ CIEEM, CIRIA & IEMA, 2019. Biodiversity Net Gain: Good practice principles for development. A practical guide [online]. Available at: <https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practicalguide-web>

⁷ Natural England, 2023. Archive Site for the Biodiversity Metric 3.1 [Online] Available: [ARCHIVE SITE for the Biodiversity Metric 2.0, 3.0, 3.1 and the beta test version of the Small Sites Metric \(naturalengland.org.uk\)](https://naturalengland.org.uk/archive-site-for-the-biodiversity-metric-3.1)

⁸ Scottish and Southern Electricity Networks Transmission, 2022. TG-NET-ENV-526. Biodiversity Net Gain Toolkit User Guide. Rev 2.00

⁹ Scottish Government (2022). National Planning Framework 4. Revised Draft. Laid before the Scottish Parliament on 8th November 2022. [Online]. Available: [National Planning Framework 4: Revised Draft \(www.gov.scot\)](https://www.gov.scot/publications/national-planning-framework-4-revised-draft/pages/1/)

¹⁰ It should be noted that, at present, enhancement that would classify as 'significant' has not yet been defined.

¹¹ Highland Environment Forum (2021). Highland Nature Biodiversity Action Plan (2021-2026) [Online] Available: [Highland Nature: Biodiversity Action Plan 2021 – 2026 – Highland Environment Forum](https://www.highland.gov.uk/highland-nature-biodiversity-action-plan-2021-2026)

for new development'. In addition, the BAP also sets out actions focussed on enhancing and protecting biodiversity and conserving priority species and key habitats.

1.6 SSEN Transmission's BNG Commitment

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 made commitments within their Sustainability Strategy¹² which are outlined in their Approach to Implementing Biodiversity Net Gain¹³ for new infrastructure projects which are 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 UN and Scottish Government Biodiversity strategies by delivering a 10% Net Gain in biodiversity on new infrastructure projects; and*
- *Work with their supply chain to gain the maximum benefit during asset replacement and upgrade.'*

1.7 Report Outline

The report is supported by the following appendices:

- **Appendix 1: Figures;**
- **Appendix 2: Irreplaceable and Non-Irreplaceable Toolkits;**
- **Appendix 3: Retained Habitats Toolkit;** and
- **Appendix 4: Non-Irreplaceable Baseline Habitats.**

An Environmental Appraisal¹⁴ has been produced by Ramboll⁴ for the proposed development, and this has been used to inform the BNG assessment.

¹² Scottish and Southern Electricity Networks, 2018. The Scottish Hydro Electric Transmission Sustainability Strategy. [Online]. Available: <https://www.ssen-transmission.co.uk/globalassets/documents/new-sustainability-documents-2024/strategies/ssen-transmission-sustainability-strategy-2024>

¹³ Scottish and Southern Electricity Networks, 2019. A Network for Net Zero. Our Approach to Implementing Biodiversity Net Gain. Consultation July 2019. [Online]. Available: [ssen-riio-t2-bio-diversity-net-gain-paper-16pp-22789-web.pdf](https://www.ssen-transmission.co.uk/globalassets/documents/new-sustainability-documents-2024/strategies/ssen-transmission-sustainability-strategy-2024) (ssen-transmission.co.uk)

¹⁴ Scottish and Southern Electricity Networks, 2023. Glen Strathfarrar. Environmental Appraisal.

2. METHODOLOGY

The methodology used for this assessment follows SSEN Transmission's BNG Toolkit User Guide¹⁵, in addition to the BNG good practice principles and guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM), Construction Industry Research and Information Association (CIRIA) & Institute of Environmental Management and Assessment (IEMA) for the development industry¹⁶.

2.1 Desk Study

A desk study was undertaken to inform the Ecology chapter of the associated EA¹⁷, and the information obtained has also informed this BNG assessment. The purpose of the desk study was to identify designated sites and irreplaceable habitats within the proposed development and to identify other natural features which may have importance for biodiversity. As per SSEN Transmission guidance, areas of blanket and raised bog assessed to be in good or moderate condition are deemed to be irreplaceable habitat. Ancient Woodland (Categories 1a and 2a¹⁸ of the Ancient Woodland Inventory¹⁹) and ancient and veteran trees, are also deemed to be irreplaceable habitat. The Ancient Woodland Inventory dataset²⁰ and SiteLink²¹ were checked for designated sites and areas of Ancient Woodland within the proposed development which would be classed as irreplaceable habitats.

SiteLink was reviewed for information on protected sites within 2 km of the proposed development. Supplementary information on the site and the wider study area were obtained from aerial images available from Google Earth.

The following has been considered within and up to 2 km from the Site:

- Designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), and Sites of Special Scientific Interest (SSSI);
- Irreplaceable habitats, including category 1a and 2a Ancient Woodland ancient/veteran trees, and blanket bog and raised bog (in good, or moderate habitat condition); and
- Other sites of importance for biodiversity, including National Nature Reserves (NNR), Local Nature Reserves (LNR), Sites of Importance for Nature Conservation (SINC).

In line with BNG guidance, any irreplaceable habitats identified within the proposed development have not been included within the baseline calculations. However, the area of irreplaceable habitats within the proposed development has been calculated in a separate SSEN Transmission Toolkit to ensure potential impacts on these habitats are captured and appropriately compensated for.

¹⁵ Scottish and Southern Electricity Networks Transmission, 2022. TG-NET-ENV-526. Biodiversity Net Gain Toolkit User Guide. Rev 2.00

¹⁶ CIRIA, CIEEM & IEMA, 2016. Biodiversity Net Gain Good Practice Principles for Development. [Online] Available: [Biodiversity-Net-Gain-Principles.pdf \(cieem.net\)](#)

¹⁷ Scottish and Southern Electricity Networks, 2023. Glen Strathfarrar. Environmental Appraisal.

¹⁸ Ancient Woodland categorised as 1a and 2a Ancient Woodland are interpreted as semi-natural woodland from maps of 1750 (1a) or 1860 (2a) and continuously wooded to the present day. If planted with non-native species during the 20th century they are referred to as Plantations on Ancient Woodland Sites (PAWS). NatureScot, 2022. A guide to understanding the Scottish Ancient Woodland Inventory (AWI). [Online] Available: [A guide to understanding the Scottish Ancient Woodland Inventory \(AWI\) | NatureScot](#)

¹⁹ NatureScot, 2010. Ancient Woodland Inventory. [Online] Available: [Ancient Woodland Inventory - Natural Spaces - NatureScot \(snh.gov.uk\)](#)

²⁰ NatureScot, 2010. Ancient Woodland Inventory. [Online] Available: [Ancient Woodland Inventory - Natural Spaces - NatureScot \(snh.gov.uk\)](#)

²¹ NatureScot, SiteLink. [Online] Accessed from: <https://sitelink.nature.scot/home>

2.2 Baseline Biodiversity Assessment

2.2.1 Habitat Survey, Irreplaceable Habitats and Condition Assessment

An extended Phase 1 habitat survey and on-site habitat condition assessment (HCA) of the habitats within the proposed development was undertaken by Ramboll in May 2023. The main habitats present were recorded using standard Phase 1 habitat survey methodology as described in the Joint Nature Conservation Committee's Handbook for Phase 1 Habitat Survey²². Target notes were used to record habitats and features of particular interest. Phase 1 habitat classifications were then translated into UK Habitat (UKHab)²³ classifications prior to being input into the Toolkit. The HCA was undertaken using the Farm Environment Plan (FEP)²⁴ method.

2.2.2 Habitat Distinctiveness, Connectivity and Strategic Significance

Distinctiveness per habitat type was determined by the pre-set values within the Toolkit. The connectivity score per habitat polygon was based upon the distinctiveness score, where:

- Low and medium distinctiveness = low connectivity; and
- High and very high distinctiveness = medium connectivity.

The strategic significance rating was entered into the Toolkit for each habitat type and was based upon the habitat's biodiversity value; the biodiversity value of a habitat was determined through desk study checks (as described in **Section 2.1**) which identify if the habitat is:

- High strategic significance: formally identified in local strategy, plan or policy;
- Medium strategic significance: location ecologically desirable but not identified in a local strategy, plan or policy; or
- Low strategic significance: not identified in a local strategy, plan or policy or no strategy or plan is in place in the area.

The Highland Nature Biodiversity Action Plan (BAP) (2021 – 2026)²⁵ was reviewed to identify priority habitats as designated by the Highland Council. Habitats within the proposed development that are designated as priority habitats in the Highland Nature BAP consist of: Heathland and shrub – Upland heathland, Wetland – Blanket bog, Wetland – Purple moor grass and rush pastures, Woodland and forest – Lowland mixed deciduous woodland and Rivers and lakes – Eutrophic standing water.

Grassland – Upland acid grassland and Grassland – Other neutral grassland have been designated as medium strategic significance due to their potential connectivity with the Glen Affric to Strathconon SPA, which overlaps all proposed development habitats. All other habitats have been designated as having low strategic significance.

2.2.3 Baseline Biodiversity Calculation

The biodiversity unit (BU) score per area-based habitat was calculated via the Toolkit using the quality factors (i.e., distinctiveness, condition, connectivity and strategic significance) and their assigned values. The sum of all the BUs provided the area-based habitat biodiversity baseline for non-irreplaceable habitats.

It should be noted that habitats impacted by temporary losses that are considered reversible (i.e, habitats affected by temporary construction that are assumed to recover to the same habitat type

²² Joint Nature Conservation Committee (JNCC), 2010. Handbook for Phase 1 habitat survey – a technique for environmental audit. JNCC: Peterborough.

²³ UKHab, 2023. UK Habitat Classification. [Online] Available: [ukhab – UK Habitat Classification](#)

²⁴ Natural England (2010). Higher Level Stewardship, Farm Environment Plan (FEP) Manual, 3rd Edition.

²⁵ Highland Council, 2021. Highland Nature Biodiversity Action Plan (2021 – 2026) [Online] Available: [Highland Nature 2021 - 26 first discussion](#)

and condition within two years from the initial impact to the habitat) are not assessed within the Toolkit. As per SSEN Transmission guidance, habitats that are impacted by temporary construction that will not recover to the same habitat type and condition within two years of the initial impact are calculated within the Toolkit as permanent losses.

Linear features are calculated using the same quality factors and are recorded as hedgerow or watercourse linear units (LU). No linear hedgerow features are present within the proposed development. However, watercourse features are found within the proposed development. Limitations and assumptions for the calculation of Watercourse LU within the proposed development are detailed within **Section 2.5**.

2.3 Post-development Biodiversity Assessment

2.3.1 Post-development Habitats and Target Condition

The post-development habitat types were determined based upon the post-development plan (see **Appendix 1, Figure 2**) using UKHab classification and the professional judgement of the ecologist.

The target condition of the post-development habitats has been assigned based upon the expert judgement of the ecologist and the future management aspirations of the site.

2.3.2 Habitat Distinctiveness, Connectivity and Strategic Significance

The distinctiveness was assigned by the Toolkit based upon the habitat types entered in the post-development sections. Habitat connectivity and strategic significance values were assigned following the methodology described in **Section 2.2**.

2.3.3 Temporal and Difficulty Risk Factors

The relevant risk factors for the 'time to target condition' and the 'difficulty to create' were assigned were assigned according to Natural England's Biodiversity Metric 3.1²⁶ by a suitably qualified ecologist and are deemed appropriate for the proposed development.

Following conversations between Ramboll and SSEN Transmission subject matter experts, it has been mutually agreed to change the approach regarding the time to target condition of irreplaceable blanket bog to 15 years. The previous approach, which follows guidance published by Natural England's Biodiversity Metric 3.1, states the length of time to reinstate blanket bog is 30+ years; however, following examples on similar projects in Scotland, Ramboll and SSEN Transmission believe 15 years' time to target condition is more reflective of the time to reinstate this habitat type and will result in a more reflective assessment of the proposed development.

It should be noted that one year has been added to the time of target condition of reinstated habitats impacted by the installation of UGC and the construction of the temporary laydown/compound area. This is to reflect the construction phase of 12 months.

2.4 Assumptions and Limitations

The assumptions that were made in order to develop a methodology to assess the impact of each relevant part of the decommissioning and construction works detailed within this section. This section also details the reasoning for not including all elements of the proposed development in the BNG assessment. Assumptions and limitations are categorised according to the specific approval they relate to.

²⁶ Natural England 2023. Biodiversity Metric 3.1: User Technical supplement. Accessed from: <http://nepubprod.appspot.com/publication/6049804846366720>

2.4.1 Electricity Act (Scotland) 1989 (Section 37)

Construction of the CSE compound and Permanent Access Track

The CSE compound is assumed to be approximately 39.5 m by 29 m and surrounded by a permanent fence. A Type 1 permanent access track approximately 500 m in length would be constructed to provide access to Tower T13R and the CSE compound. It is assumed that all habitats that fall within the footprint of the CSE compound and permanent access track will be permanently lost to the proposed development, with the post-development habitat assumed to be Urban – Developed land; sealed surface. **This has been calculated as a permanent loss within this BNG assessment.**

Construction of the new Terminal Tower (Tower 13R)

Tower 13R would be constructed within the CSE compound footprint, and therefore **losses incurred due to Tower 13R do not need to be calculated separately.**

Temporary Construction Laydown Area

A temporary construction laydown area (approximately 0.96 ha) would be used to provide office accommodation and welfare facilities for staff involved within the project, and it is estimated that the construction phase would last for approximately 12 months. The habitats impacted by the temporary construction laydown area consist of mixed scrub, upland heathland, bare ground and lowland mixed deciduous woodland.

It is assumed that the loss of 0.05 ha of bare ground (in poor condition) will reinstate to its original habitat and pre-construction condition within 2 years of the initial impact, and therefore **losses of this habitat have not been calculated within this BNG assessment.**

It is assumed that the remaining habitats impacted by the construction of a temporary construction laydown area would not reinstate to their original habitat and condition within 2 years, and therefore losses to **these habitats are calculated within this BNG assessment.** The following assumptions for habitat creation in those areas have been made:

- It is assumed that mixed scrub (good condition), upland heathland and lowland mixed deciduous woodland (moderate condition) will be reinstated to their original baseline habitat and condition.

2.4.2 The Town and Country Planning (General Permitted Development) (Scotland) Order 1992

Overhead Lines Undergrounding

Whilst the final cable installation method would be determined by the Principal Contractor selected to undertake the works, for the purpose of the EA and this assessment it was assumed that an open cable trench method would be used for the majority of the proposed alignment, as this represents a worst-case scenario in terms of the ground disturbed. To install the cable, it is assumed that the maximum width of excavation is 2.50 m. It is therefore assumed the excavation width for the entirety of the UGC length is 2.50 m.

It should be noted that Horizontal Directional Drilling (HDD) has been proposed for a short length of the UGC alignment starting around 1.3 km south-west of Tower 13R and extending approximately 500-600 m west depending on the final geotechnical investigations. A 2.50 m excavation width has also been assumed for this length of UGC as a precautionary measure.

The baseline habitat data gathered as part of the EA was analysed using GIS in order to identify habitats within the 2.5 m excavation zone that will be impacted by the proposed development. It is assumed that modified grassland (poor condition), bare ground and developed land; sealed surface will return to their original habitat type and condition within 2 years of the initial impact, and therefore **impacts to these habitats have not been calculated within this BNG**

assessment. It is assumed that all other habitat types impacted by the installation of the UGC will not return to their original habitat type and condition within 2 years of the initial impact and therefore **these losses have been calculated within this BNG assessment as permanent losses.** The following assumption for non-irreplaceable habitat creation in these areas has been made:

- It is assumed that all other non-irreplaceable habitats will be reinstated to their original baseline habitat and condition.

Where irreplaceable blanket bog (in good condition) will be lost to the installation of UGC, it is assumed that the blanket bog is reinstated, dropping by one condition score (to moderate condition).

Temporary Access Tracks

Temporary access tracks may be required along the UGC alignment to enable access for cable installation, and along the existing OHL alignment to enable access to dismantle the existing towers. Where required, it is expected that access to the existing OHL would be formed using temporary track mats, although it may be feasible to drive on the ground directly where only limited access is required and depending on ground conditions. **The locations of temporary access tracks are unknown at this stage and therefore the impacts have not been calculated within this BNG assessment.** It is recommended that impacts are re-assessed when locations are known, if necessary.

2.4.3 The Overhead Lines (Exemption) (Scotland) Regulations 2013

Decommissioning and Removal of the existing OHL between Deannie Substation and Tower 13

The proposed development includes the decommissioning and removal of the existing OHL between Deannie Substation and Tower 13 (approximately 3.75 km of 132 kV and 33 kV OHL), alongside the decommissioning and removal of Towers 1-13.

The removal of the towers and associated hardstanding have not been calculated within this BNG assessment as legal agreements with landowners would be required to guarantee any post-development habitats existence post-construction. It is assumed that BU gain from the decommissioning and removal of the OHL, hardstanding and towers would be minimal and not greatly impact the results of this BNG assessment.

Installation of a Replacement Section of OHL between Tower 13R and the existing Tower 14

The length of OHL replacement is approximately 180 m. No habitat losses are assumed for the OHL replacement, and therefore, **no losses have been calculated within this BNG assessment.**

3. BIODIVERSITY BASELINE

3.1 Desk Study: Designated Sites

Three statutory designated sites intersect with the Site Boundary, as shown on **Figure 6.1: Ecology Constraints (EA Chapter 6)**. The east of the proposed development, including the proposed CSE compound, Tower 13R and associated access track fall within Strathglass Complex SAC²⁷, which is designated for the presence of North Atlantic wet heaths, alpine and boreal heaths, sub-Arctic *Salix spp.* scrub, blanket bog and Caledonian forest. The proposed CSE compound, Tower 13R and associated access track and the eastern UGC easement also fall within the Glen Strathfarrar SSSI²⁸, designated for its breeding bird assemblage, dragonfly assemblage, lichen assemblage and native pinewood. The entire proposed development falls within the Glen Affric to Strathconon SPA²⁹, designated for the presence of breeding Golden eagle *Aquila chrysaetos*, containing habitats such as acid grasslands, heaths and willow scrub. Potential impacts and effects on these designated sites, and proposed mitigation, are considered and outlined within **Chapter 6: Ecology and Ornithology** of the EA.

3.2 Irreplaceable Habitats

No category 1a or 2a Ancient Woodland, ancient or veteran trees, or raised bog, were found within the Site Boundary. Irreplaceable blanket bog of good and moderate condition was identified within the proposed development.

3.2.1 Electricity Act (Scotland) 1989 (Section 37)

As shown in **Table 3-1**, total of 0.06 ha of moderate condition blanket bog will be permanently lost to the proposed development (due to the construction of the permanent access track).

Table 3-1: Baseline Irreplaceable Habitats and Condition – Permanent Loss (Section 37)

UKHab Habitat Type	Area (ha)	Condition	Distinctiveness	Post-development Action
Wetland – Blanket bog	0.06	Moderate	High	Permanent loss
Total	0.06	-	-	-

3.2.2 The Town and Country Planning (General Permitted Development) (Scotland) Order 1992

As shown in **Table 3-2**, a total of 0.12 of irreplaceable blanket bog (good condition) will be removed during the installation of the UGC. This loss is calculated within the irreplaceable habitat Toolkit as this habitat is not expected to return to its original habitat type and condition within 2 years. It is assumed that this habitat will be reinstated as moderate condition blanket bog.

²⁷ SiteLink, 2005. Strathglass Complex Special Area of Conservation. [Online] Available: [SiteLink \(nature.scot\)](#)

²⁸ SiteLink, 1984. Glen Strathfarrar SSSI. [Online] Available: [SiteLink \(nature.scot\)](#)

²⁹ SiteLink, 2010. Glen Affric to Strathconon SPA. [Online] Available: [SiteLink \(nature.scot\)](#)

Table 3-2: Baseline Irreplaceable Habitats and Condition - Permanent Loss (General Permitted Development)

UKHab Habitat Type	Area (ha)	Condition	Distinctiveness	Post-development Action
Wetland – Blanket bog	0.12	Good	High	Permanent loss
Total	0.12	-	-	-

3.3 Non-Irreplaceable Habitats

The full list of non-irreplaceable habitats found within the wider Site Boundary are detailed in **Appendix 4**.

3.4 Linear Habitats

3.4.1 Hedgerows

No hedgerows are present within the proposed development.

3.4.2 Watercourses

A total of 1.51 km of watercourses are found within the wider Site Boundary, as shown in **Appendix 1, Figure 3**. During construction, culverts would allow the temporary haul road to pass over smaller watercourses. For the UGC, smaller watercourses and field drains would be crossed by excavating a trench whilst the channel is dry using cofferdams and bypass pumps. The UGC would also pass beneath three small watercourses along the HDD route; however, these would be unaffected due to the depth of the bore. **Therefore, it is assumed that there are no impacts to any of the watercourses within the wider Site Boundary**, and therefore watercourses have not been assessed within the proposed development.

3.5 Trees

There are no individual trees (outside of habitats with trees), or ancient or veteran trees, currently present within the proposed development.

4. CALCULATION OF BIODIVERSITY CHANGE

4.1 Irreplaceable Biodiversity Change Calculations

4.1.1 Electricity Act (Scotland) 1989 (Section 37)

Table 4-1 shows the calculation of change for irreplaceable habitats as a result of the proposed development for irreplaceable blanket bog, which requires approval under the Electricity Act (1989).

Table 4-1: Irreplaceable Baseline Biodiversity, Post-development Biodiversity and Biodiversity Change (Section 37)

UKHab Habitat Type	Area (ha)	Condition	Distinctiveness	Post- development Action	Post- development Habitat
Wetland – Blanket bog	0.06	Moderate	High	Permanent loss	Urban – Developed land; sealed surface
Total	0.06	-	-	-	-

4.1.2 The Town and Country Planning (General Permitted Development) (Scotland) Order 1992

Table 4-2 shows the calculation of change for irreplaceable habitats as a result of the proposed development for irreplaceable blanket bog, which falls under General Permitted Development (1992).

Table 4-2: Irreplaceable Baseline Biodiversity, Post-development Biodiversity and Biodiversity Change (General Permitted Development)

UKHab Habitat Type	Area (ha)	Condition	Distinctiveness	Post- development Action	Post- development Habitat
Wetland – Blanket bog	0.12	Good	High	Permanent Loss	Wetland – Blanket bog (moderate condition)
Total	0.12	-	-	-	-

4.2 Non-Irreplaceable Biodiversity Change Calculations

4.2.1 Electricity Act (Scotland) 1989 (Section 37)

Table 4-3 shows the calculation of change for impacted area-based habitats pre-and post-development, along with the outcome for biodiversity, for habitats impacted by the construction of the CSE compound, permanent access track and temporary construction compound. Overall the proposed development would lead to a Net Loss of -80%. The post-development UKHab habitats, their proposed after-work condition and the BU each habitat delivers are detailed in **Appendix 2**.

Table 4-3: Non-irreplaceable Baseline Biodiversity, Post-development Biodiversity and Biodiversity Change (Section 37)

Biodiversity Feature	Baseline Area (ha)	Baseline Units (BU)	Post-development Units (BU)	Change in Biodiversity Units (BU)	Outcome
Area-based Habitats	1.31	20.99	4.14	-16.85	-80%

4.2.2 The Town and Country Planning (General Permitted Development) (Scotland) Order 1992

Table 4-4 shows the calculation of change for impacted area-based habitats pre- and post-development, along with the outcome for biodiversity, for habitats within the 2.5 m excavation zone required for the installation of the UGC. Overall, the proposed development would lead to a Net Loss of -66%. The post-development UKHab habitats, their proposed after-work condition and the BU each habitat delivers are detailed in **Appendix 2**.

Table 4-4: Non-irreplaceable Baseline Biodiversity, Post-development Biodiversity and Biodiversity Change (General Permitted Development)

Biodiversity Feature	Baseline Area (ha)	Baseline Units (BU)	Post-development Units (BU)	Change in Biodiversity Units (BU)	Outcome
Area-based Habitats	1.35	25.72	8.84	-16.88	-66%

5. DISCUSSION

5.1 Recommendations for Irreplaceable Habitats

5.1.1 Electricity Act (Scotland) 1989 (Section 37)

Proposed post-development plans will result in a loss of 0.06 ha of irreplaceable blanket bog (in moderate condition). It is recommended that the enhancement of approximately 6 ha of blanket bog is undertaken to mitigate for this loss, either through the enhancement of poor and moderate condition blanket bog on-site (to moderate and good condition respectively), or via off-site mitigation. The enhancement of poor and moderate condition blanket bog could include:

- Management to ensure the cover of scrub and scattered trees is less than 10% of the habitat;
- Management to ensure bare ground cover is less than 5% of the habitat;
- Management and monitor invasive non-native species;
- Management to ensure sphagnum moss *Sphagnum* spp. and cotton grasses *Eriophorum* spp. are frequent throughout the habitat; and
- Management to ensure the habitat is representative of the UKHab definition of blanket bog.

5.1.2 The Town and Country Planning (General Permitted Development) (Scotland) Order 1992

The installation of the UGC will result in the loss of 0.12 ha of irreplaceable blanket bog (in good condition). At present, it is assumed that this blanket bog will be reinstated in moderate condition. It is recommended that, if possible, reinstated blanket bog is managed to achieve good condition. In addition, it is recommended that 0.12 ha of blanket bog enhancement is undertaken on or off-site to mitigate for the loss. This could include the enhancement of blanket bog from poor to moderate condition, or from moderate to good condition.

5.2 Recommendations for Non-Irreplaceable Habitats

5.2.1 Electricity Act (Scotland) 1989 (Section 37)

Section 4.2.1 of this report shows that the construction of the permanent access track, CSE compound and temporary construction compound will result in a -80% Net Loss in non-irreplaceable biodiversity (-16.85 BU), demonstrating that, at present, a 10% Net Gain in biodiversity will not be achieved for non-irreplaceable habitats without biodiversity enhancements undertaken. The reduction in biodiversity is predominantly a result of habitat loss of upland heathland, upland acid grassland and woodland habitats.

It is recommended that on-site enhancement and habitat restoration is undertaken to mitigate this loss and for the proposed development (permitted under Section 37), to achieve a 10% Net Gain. It is recommended that losses are compensated for via the enhancement of retained habitats within the wider Site Boundary. A summary of recommended enhancements is outlined in **Table 5-1**. The recommendations would achieve an additional 25.88 BU and lead the proposed development to achieve a 10% Net Gain as per the BNG results presented in

Table 5-2.

Table 5-1: Recommendations to Achieve a 10% Net Gain for Non-irreplaceable Habitats (Section 37)

Baseline UKHab Habitat Type	Location	Area (ha)	Baseline Units (BU)	Post-development recommendation	Potential Increase in Biodiversity Units (BU)
Woodland and forest – Other woodland; broadleaved	Site Boundary ³⁰	0.25	1.10	Retained habitat. Enhance from poor to moderate condition	+0.77
Heathland and shrub – Upland heathland	Site Boundary	4.56	69.22	Retained habitat. Enhance from moderate to good condition	+11.36
Grassland – Modified grassland	Site Boundary	1.56	3.12	Retained habitat. Enhance to other neutral grassland in moderate condition	+13.67
Heathland and shrub – Mixed scrub	Site Boundary	0.05	0.10	Retained habitat. Enhance from poor to moderate condition	+0.08
Total	-	6.42	73.54	-	+25.88

Table 5-2: Recommendations: Baseline Biodiversity, Post-development Biodiversity and Biodiversity Change (Section 37)

Biodiversity Feature	Baseline Area (ha)	Baseline Units (BU)	Post-development Area (ha)	Post-development Units (BU)	Change in Biodiversity Units (BU)	Outcome
Area-based Habitats	7.73*	94.53	7.73*	103.57	+9.04	+10%

*This is the total area of the habitats in **Table 4-3** and **Table 5-1**.

5.2.2 The Town and Country Planning (General Permitted Development) (Scotland) Order 1992

Section 4.2.2 of this report shows that the installation of the UGC will result in a -66% Net Loss in non-irreplaceable biodiversity (-16.88 BU), demonstrating that, at present, a 10% Net Gain in biodiversity will not be achieved for non-irreplaceable habitats without biodiversity enhancements undertaken. The reduction in biodiversity is predominantly a result of habitat loss of upland heathland, bracken and other neutral grassland.

It is recommended that on-site enhancement and restoration is undertaken to mitigate this loss and for the proposed development (general permitted development) to achieve a 10% Net Gain. It is recommended that losses are compensated for via the enhancement of retained habitats within the wider Site Boundary. A summary of recommended enhancements is outlined in **Table 5-3**. The recommendations would achieve an additional 21.58 BU and lead the proposed development to achieve a 10% Net Gain as per the BNG results presented in

³⁰ Habitats noted as being within the 'Site Boundary' are not impacted by the proposed development and therefore have not been assessed in Section 3 and 4 of this report. It is recommended that retained habitats within the wider Site Boundary (but not within the Site) are enhanced to compensate for losses incurred by habitats within the Site.

Table 5-4.

Table 5-3: Recommendations to Achieve a 10% Net Gain for Non-irreplaceable Habitats (General Permitted Development)

Baseline UKHab Habitat Type	Location	Area (ha)	Baseline Units (BU)	Post-development recommendation	Potential Increase in Biodiversity Units (BU)
Grassland – Modified grassland	Site Boundary ³¹	2.00	4.00	Retained habitat in poor condition. Enhance to other neutral grassland in moderate condition	+17.53
Heathland and shrub – Upland heathland	Site Boundary	1.00	15.18	Retained habitat. Enhance from moderate to good condition	+2.49
Heathland and shrub – Mixed scrub	Site Boundary	0.05	0.10	Retained habitat. Enhance from poor to moderate condition	+0.08
Grassland – Upland acid grassland	Site Boundary	0.08	0.58	Retained habitat. Enhance from poor to moderate condition	+0.41
Wetland – Blanket bog	Site Boundary	0.24	1.82	Retained habitat. Enhance from poor to moderate condition	+1.07
Total	-	3.37	21.68	-	+21.58

Table 5-4: Recommendations: Baseline Biodiversity, Post-development Biodiversity and Biodiversity Change (General Permitted Development)

Biodiversity Feature	Baseline Area (ha)	Baseline Units (BU)	Post-development Area (ha)	Post-development Units (BU)	Change in Biodiversity Units (BU)	Outcome
Area-based Habitats	4.72*	47.40	4.72*	52.10	+4.69	+10%
*This is the total area of the habitats in Table 4-4 and Table 5-3 .						

5.3 Long-term Management

Habitats delivered in the landscape strategy should be sympathetically managed for biodiversity to ensure they develop appropriately. Management and monitoring of the habitats over a 30-year period is recommended to ensure they reach maturity and their target condition, in line with the BNG principles. A Habitat Management Plan (HMP) should be produced which would describe the long-term management and monitoring of habitats and features suitable for use by wildlife. This would include measures to increase the ecological measures to increase the ecological value of the

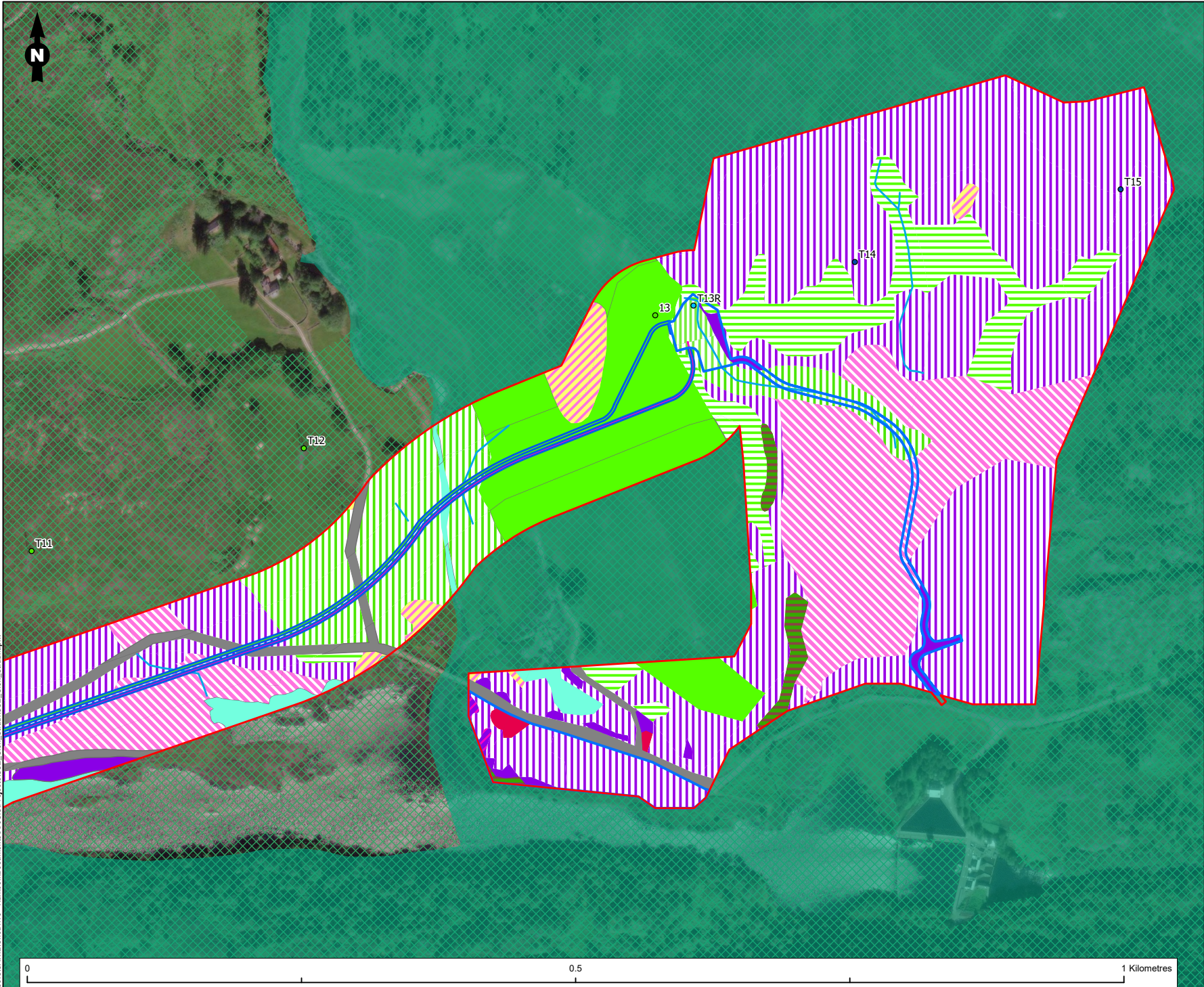
³¹ Habitats noted as being within the 'Site Boundary' are not impacted by the proposed development and therefore have not been assessed in Section 3 and 4 of this report. It is recommended that retained habitats within the wider Site Boundary (but not within the proposed development) are enhanced to compensate for losses incurred by habitats within the proposed development.

Site following completion of the development and for the long-term. The HMP would be handed over and explained to a maintenance company or staff responsible for ongoing management of the Site.

The HMP should be suitable for a 15-year period, after which it would be advised that it is reviewed and updated. SSEN Transmission's guidance document states that 'ongoing management must be undertaken in order for a development to achieve Net Gain'³². Long-term management of the habitats over a 30 year-period (the time to target condition for some habitats, such as lowland mixed deciduous woodland, is 30 years) to ensure the correct development and management of the habitats, is in line with the BNG principles.

³² Scottish and Southern Electricity Networks Transmission, 2022. TG-NET-ENV-526. Biodiversity Net Gain Toolkit User Guide. Rev 2.00

APPENDIX 1 FIGURES



Legend

- Site Boundary
- RLB Site
- Existing Towers
- Existing Towers to be Removed
- Proposed Sealing End Tower (T13R)
- Proposed 132kV Cable Route
- Proposed 33kV Cable Route
- Glen Strathfarrar SSSI/Strathglass Complex SAC
- Glen Affric to Strathconon SPA
- UKHab Habitat Classification
 - Rivers and streams - Other rivers and streams
 - g1c - Grassland - Bracken
 - g4 - Grassland - Modified grassland
 - g1 - Grassland - Upland acid grassland
 - h3e - Heathland and shrub - Gorse scrub
 - h3h - Heathland and shrub - Mixed scrub
 - h1b - Heathland and shrub - Upland heathland
 - r1a - Rivers and lakes - Eutrophic standing water
 - u1 - Urban - Bare ground
 - u1b - Urban - Developed land; sealed surface
 - f1a - Wetland - Blanket bog
 - f2c - Wetland - Upland flushes, fens and swamps
 - w1f - Woodland and forest - Lowland mixed deciduous woodland

Figure Title

UKHab Baseline Map

Project Name Glen Strathfarrar VISTA	
Project Number 1620008770	Figure No. 1.1
Date November 2024	Prepared By SW
Scale 1:3,300 @A3	Issue 1
Client SSEN Transmission	



Legend

Site Boundary

RLB Site

Existing Towers to be Removed

Proposed 132kV Cable Route

Proposed 132kV Cable Route (HDD)

Proposed 33kV Cable Route

Proposed 33kV Cable Route (HDD)

Glen Strathfarrar SSSI/Strathglass Complex SAC

Glen Affric to Strathconon SPA

UKHab Habitat Classification

Rivers and streams - Other rivers and streams

g1c - Grassland - Bracken

g1 - Grassland - Upland acid grassland

h1b - Heathland and shrub - Upland heathland

r1a - Rivers and lakes - Eutrophic standing water

u1b - Urban - Developed land; sealed surface

f1a - Wetland - Blanket bog

w1f - Woodland and forest - Lowland mixed deciduous woodland

Figure Title

Glen Strathfarrar VISTA

Project Name

Glen Strathfarrar VISTA

Project Number	Figure No.
1620008770	1.2
Date	Prepared By
November 2024	SW
Scale	Issue
1:3,300 @A3	1

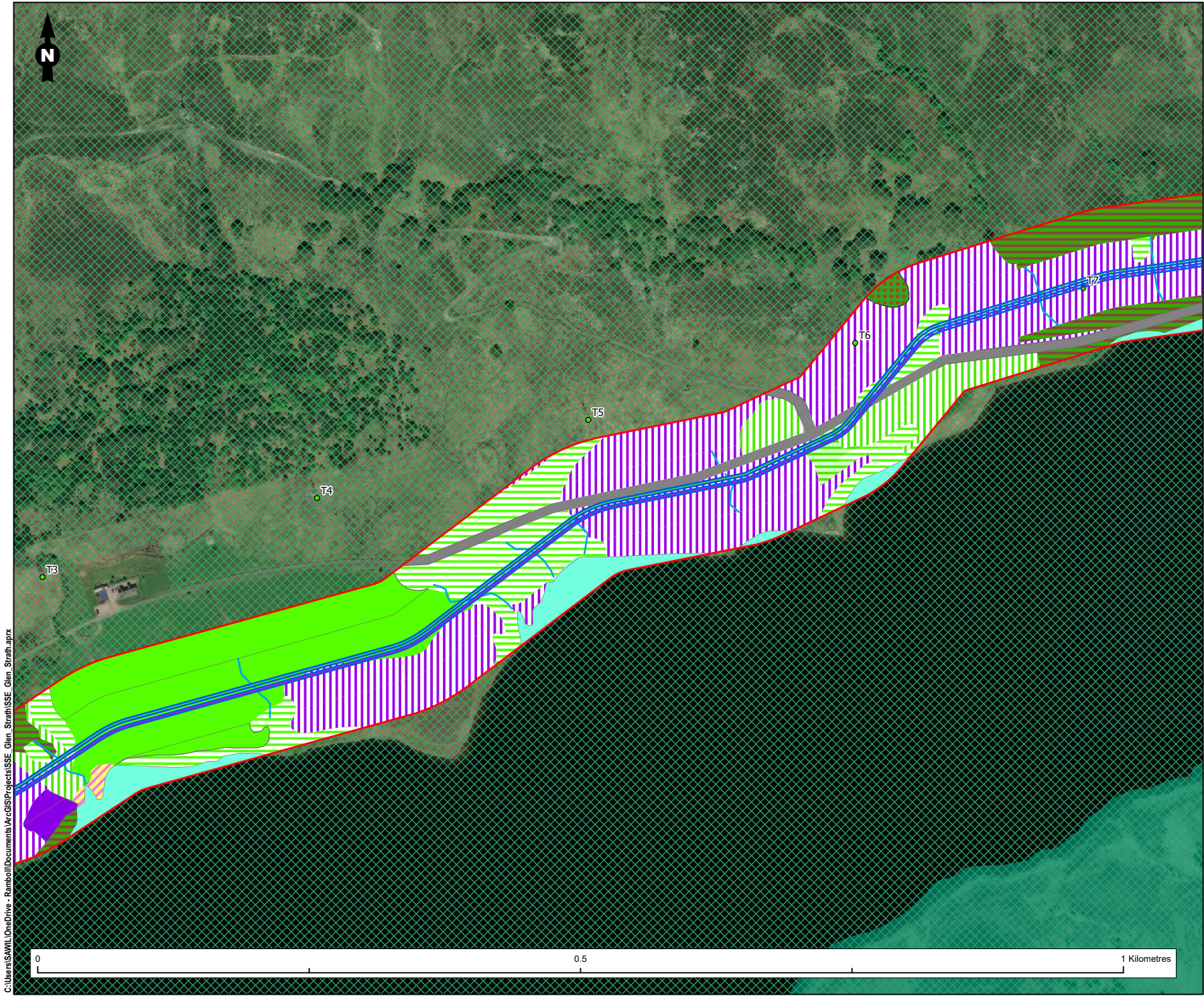
Client

SSEN Transmission

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Coordinate System: British National Grid. Projection: Transverse Mercator. Datum: OSGB 1936.



Legend

Site Boundary

RLB Site

Existing Towers to be Removed

Proposed 132kV Cable Route

Proposed 132kV Cable Route (HDD)

Proposed 33kV Cable Route

Proposed 33kV Cable Route (HDD)

Glen Strathfarrar SSSI/Strathglass Complex SAC

Glen Affric to Strathconon SPA

UKHab Habitat Classification

Rivers and streams - Other rivers and streams

g1c - Grassland - Bracken

g4 - Grassland - Modified grassland

g3c - Grassland - Other neutral grassland

g1 - Grassland - Upland acid grassland

h3h - Heathland and shrub - Mixed scrub

h1b - Heathland and shrub - Upland heathland

r1a - Rivers and lakes - Eutrophic standing water

u1b - Urban - Developed land; sealed surface

f2c - Wetland - Upland flushes, fens and swamps

w1f - Woodland and forest - Lowland mixed deciduous woodland

Figure Title

Glen Strathfarrar VISTA

Project Name

Glen Strathfarrar VISTA

Project Number	Figure No.
1620008770	1.3
Date	Prepared By
November 2024	SW
Scale	Issue
1:3,300 @A3	1

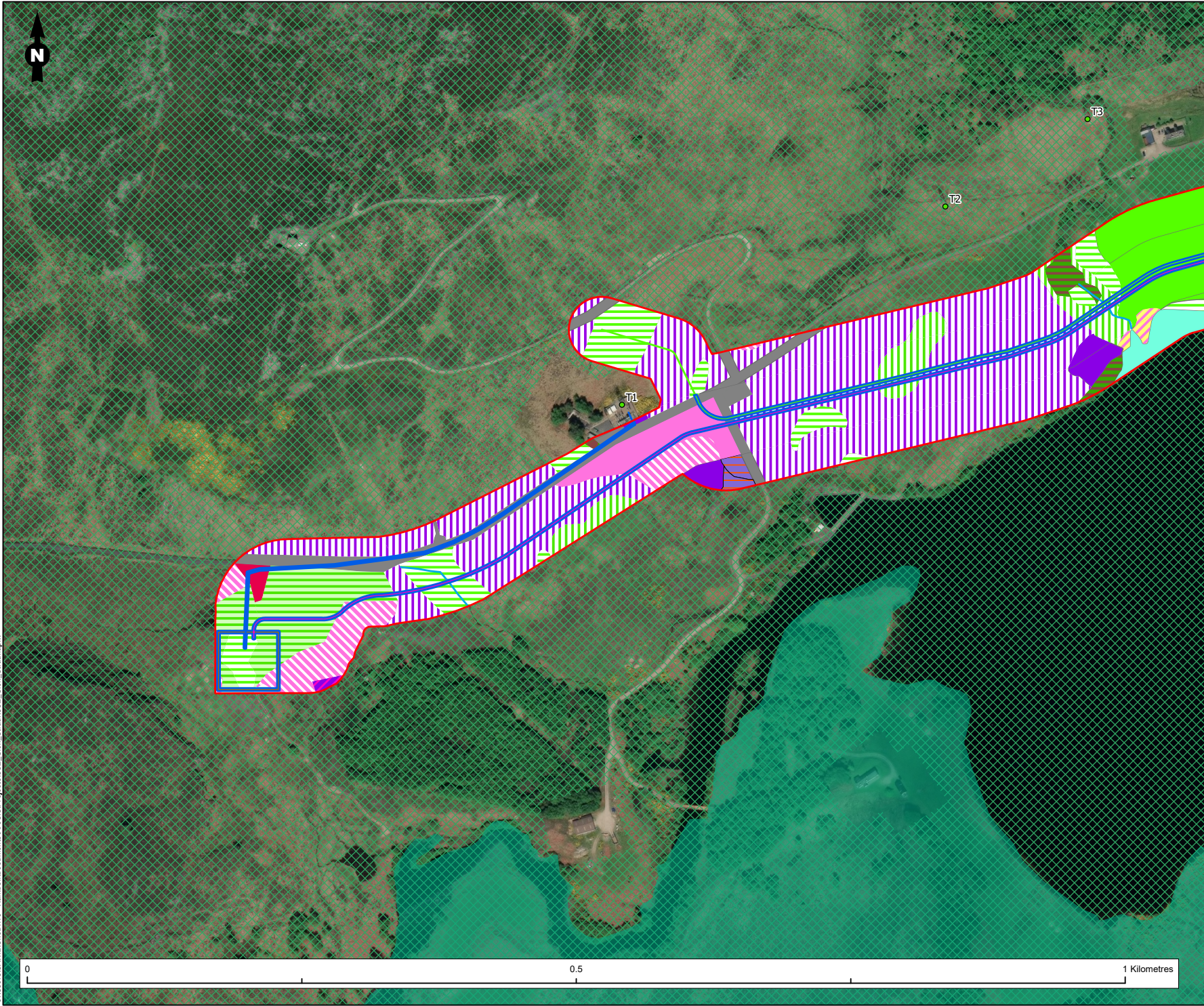
Client

SSEN Transmission

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Coordinate System: British National Grid. Projection: Transverse Mercator. Datum: OSGB 1936.



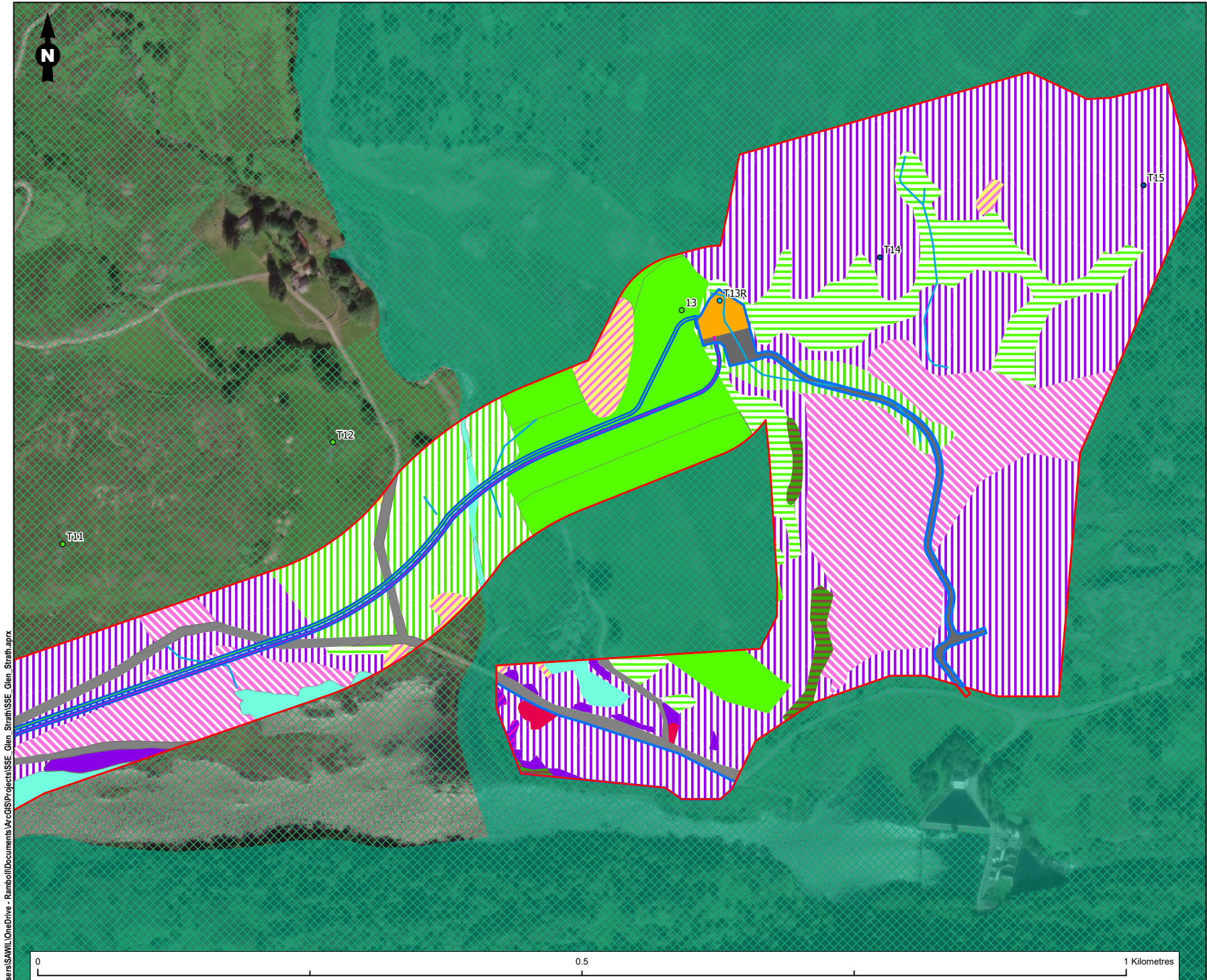
Legend

- Site Boundary
- RLB Site
- Existing Towers to be Removed
- Proposed 11kV Route
- Proposed 132kV Cable Route
- Proposed 33kV Cable Route
- Proposed Deanie Substation
- Glen Strathfarrar SSSI/Strathglass Complex SAC
- Glen Affric to Strathconon SPA
- UKHab Habitat Classification
 - Rivers and streams - Other rivers and streams
 - g1c - Grassland - Bracken
 - g4 - Grassland - Modified grassland
 - g3c - Grassland - Other neutral grassland
 - g1 - Grassland - Upland acid grassland
 - h3e - Heathland and shrub - Gorse scrub
 - h3h - Heathland and shrub - Mixed scrub
 - h1b - Heathland and shrub - Upland heathland
 - u1 - Urban - Bare ground
 - u1b - Urban - Developed land; sealed surface
 - f1a - Wetland - Blanket bog
 - f2b - Wetland - Purple moor grass and rush pastures
 - f2c - Wetland - Upland flushes, fens and swamps
 - w1f - Woodland and forest - Lowland mixed deciduous woodland
 - w1h - Woodland and forest - Other woodland; mixed

Figure Title

UKHab Baseline Map

Project Name Glen Strathfarrar VISTA	
Project Number 1620008770	Figure No. 1.4
Date November 2024	Prepared By SW
Scale 1:3,300 @A3	Issue 1
Client SSEN Transmission	



Legend

- Site Boundary
- RLB Site
- Existing Towers
- Existing Towers to be Removed
- Proposed Sealing End Tower (T13R)
- Proposed 132kV Cable Route
- Proposed 33kV Cable Route
- CSE Compound Access Track
- Proposed CSE Compound
- Glen Strathfarrar SSSI/Strathglass Complex SAC
- Glen Affric to Strathconon SPA

UKHab Habitat Classification

- Rivers and streams - Other rivers and streams
- g1c - Grassland - Bracken
- g4 - Grassland - Modified grassland
- g1 - Grassland - Upland acid grassland
- h3e - Heathland and shrub - Gorse scrub
- h3h - Heathland and shrub - Mixed scrub
- h1b - Heathland and shrub - Upland heathland
- r1a - Rivers and lakes - Eutrophic standing water
- u1 - Urban - Bare ground
- u1b - Urban - Developed land; sealed surface
- f1a - Wetland - Blanket bog
- f2c - Wetland - Upland flushes, fens and swamps
- w1f - Woodland and forest - Lowland mixed deciduous woodland

Figure Title

UKHab Post-development Map

Project Name Glen Strathfarrar VISTA	
Project Number 1620008770	Figure No. 2.1
Date November 2024	Prepared By SW
Scale 1:3,300 @A3	Issue 1
Client SSEN Transmission	