

Volume 4: Appendix 3.6 – Outline

Decommissioning Mitigation Strategy

Emmock and Tealing 400 kV Overhead Line Tie-Ins

Environmental Impact Assessment (EIA)

Volume 4 | Appendix 3.6

Outline Decommissioning Mitigation Strategy

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LIST OF ABBREVIATIONS

DEMP – Decommissioning Environmental Management Plan

DRP – Decommissioning and Restoration Plan

EIAR – Environmental Impact Assessment Report

GEMP – General Environmental Management Plan

OHL – Overhead Line

SPP – Species Protection Plan

1. OUTLINE DECOMMISSIONING MITIGATION STRATEGY

1.1 Introduction

- 1.1.1 This appendix provides an Outline Decommissioning Mitigation Strategy which has been prepared as a high-level statement of the approach and commitment to mitigating potentially Significant effects from future dismantling and decommissioning activities associated with the Proposed Development.
- 1.1.2 It should be read in conjunction with the following chapters and appendices of the EIAR:
- **Volume 2, Chapter 3: Project Description** which presents general details of the Proposed Development including environmental management measures during construction.
 - Appendices to **Volume 2, Chapter 3: Project Description** which set out further details of environmental management measures which have potential relevance to decommissioning activities, including: **Volume 4, Appendix 3.2: General Environmental Management Plans (GEMPs) and Species Protection Plans (SPPs)**, **Appendix 3.3: Outline Site Restoration Plan**, and **Appendix 3.4: Outline Construction Environmental Management Plan (CEMP)**.
- 1.1.3 This Outline Decommissioning Mitigation Strategy has been prepared by Land Use Consultants (LUC) on behalf of the Applicant drawing on information presented in other sections of the EIAR, experience in the preparation of decommissioning plans for other representative projects, and relevant good practice guidance¹.

1.2 Requirement for the Outline Decommissioning Strategy

- 1.2.1 The EIAR for the Proposed Development has been scoped to focus on the potential Significant effects of the construction and operation phases of transmission infrastructure. The scope is confirmed in **Volume 2, Chapter 6: Scope and Consultation** which identifies that the potential for Significant environmental effects from decommissioning of the OHL and related infrastructure would be representative of, and no worse than, the effects reported in this EIAR for the construction stage, it is also likely that decommissioning activities would be completed in a short period of time than for construction.
- 1.2.2 Since any project decommissioning proposals would not occur until a significant period of time into the future (if at all), specific individual mitigation measures have not been defined at this stage for refurbishment, or decommissioning activities. However, the Applicant recognises that it is good practice to include a commitment to mitigation of potential environmental effects from any future decommissioning activities. This Outline Decommissioning Mitigation Strategy will therefore form part of the committed mitigation for the Proposed Development and is included in **Volume 2, Chapter 13: Schedule of Environmental Mitigation**.

1.3 Strategy Approach

Outline Decommissioning Mitigation Strategy

- 1.3.1 This Outline Decommissioning Mitigation Strategy sets out the Applicant's commitment to ensuring that the potential Significant environmental effects of any future dismantling and decommissioning of the Proposed Development will be appropriately considered and mitigated.
- 1.3.2 At the time of preparation of this EIAR, it is not known when – or whether – any decommissioning of the OHL and associated infrastructure would be required. The Proposed Development forms a key part of the upgrading of the high voltage electricity transmission network in the area managed by SSEN Transmission in northeast Scotland and it is anticipated to be required to support long-term delivery of energy supply, energy security, and Net Zero commitments at the UK and Scottish Government levels. Any potential requirement to dismantle, remove and decommission the Proposed Development would therefore only be likely to take place many decades from now. Should a decision be taken to refurbish the OHL rather than dismantle it, this may involve replacement of tower structures; although this would also be in the long-term horizon given the potential design life of steel lattice towers of

¹ Including reference to Scottish Natural Heritage, 2016. *Decommissioning and Restoration Plans for wind farms*, Guidance Version 2 – February 2016. [Online] Available at: <https://www.nature.scot/doc/guidance-decommissioning-and-restoration-plans-wind-farms-february-2016>.

up to 80 years². This Outline Decommissioning Mitigation Strategy therefore sets out a high-level statement to ensure that the potential environmental effects of any future dismantling and decommissioning (or refurbishment) would be thoroughly evaluated and that appropriate mitigation measures would be implemented in the decommissioning phase.

Development of a Decommissioning Strategy

- 1.3.3 The Applicant anticipates that any Section 37 Consent for the Proposed Development would likely include a condition requiring the approval of a Decommissioning Strategy and/or Plan either prior to commencement of the OHL installation or at another milestone date. The Applicant would seek to discharge any such requirement based on the specifics of the condition and with reference to this Outline Decommissioning Mitigation Strategy.
- 1.3.4 The Decommissioning Strategy would be anticipated to include the following:
- Objectives and Purpose;
 - Relevant Consenting and Permitting Requirements;
 - Outline Dismantling and Decommissioning Method Statement;
 - Outline Register of Potential Environmental Effects;
 - Proposals for Environmental Management and Monitoring during Decommissioning;
 - Outline Requirements for the Decommissioning and Restoration Plan(s) (see below); and
 - Timescales and Procedures for Review and Update.
- 1.3.5 The Decommissioning Strategy would provide a management framework to ensure that potential future requirements for dismantling and decommissioning are considered on regular basis as part of the Applicant's project and asset management procedures. Periodic updating of the Strategy would be undertaken and communicated to the relevant consenting authorities for information, review and discussion.
- 1.3.6 As part of the periodic review process for the Strategy, the Applicant (or future Transmission License Holder) would have regard to changes in future regulatory and permitting requirements and best practice in construction, health and safety and environmental management. The Strategy review would therefore inform a decision-making process at regular intervals to maintain its currency.
- 1.3.7 The Strategy would also have regard to relevant mitigation measures and strategies presented in the EIAR, particularly those relating to construction environmental management which have similar characteristics to decommissioning works, but noting that the currency and applicability of the EIAR would reduce with time.

Development of a Decommissioning and Restoration Plan

- 1.3.8 The Decommissioning Strategy would commit to the development of a future Decommissioning and Restoration Plan (DRP) which would be prepared by the Transmission License Holder at an agreed project lifecycle stage, in the event that proposals for decommissioning were likely to be required. The DRP would be a more detailed document than the Decommissioning Strategy and would set out specific information about how dismantling and decommissioning would be undertaken including method statements and programmes.
- 1.3.9 The DRP would also incorporate specific mitigation to avoid or reduce predicted environmental effects. Preparation of any such Plan would need to involve review of the potential for Significant environmental effects to refresh the work undertaken in the EIAR and with specific reference to a bespoke project methodology for dismantling and decommissioning and in compliance with prevailing health and safety management requirements. The dismantling and decommissioning methods would be reviewed by the Transmission Licence Holder with their relevant

² The OHL towers may be in service for approximately 80 years or sometimes longer, while the associated equipment (eg conductors/insulators) typically have a design life of 40 years. Re-conductoring works may therefore be required before any consideration of tower upgrading or replacements. The extent and timescale of any re-conductoring would be significantly less than for construction activities for either tower replacement or decommissioning however the environmental management principles described in this Outline Strategy would be applied, as relevant, in the planning and implementation of works to re-conductor the OHL.

engineering, environmental and land advisory teams to ensure that an approach was developed which had the least potential for Significant environmental effects, considering other constraints where appropriate.

- 1.3.10 The process would allow for consideration and selection of the best practicable environmental options in the decommissioning methodology and would be discussed with the relevant planning and environmental regulatory consultees. For example, this might include appraisal of the relative benefits and impacts of removal of OHL tower foundations (as opposed to retention *in situ* below ground level) and considering removal of sections of permanent access tracks where their retention might offer longer-term opportunities for access or land and forestry management. The means of access, and plant requirements for dismantling and restoration works, would also be carefully considered in relation to known sensitivities and ground conditions established from OHL maintenance records.
- 1.3.11 The review of potential environmental effects and mitigation would consider a contemporary understanding of the (future) sensitivity of the principal baseline receptors and prevailing best practice in environmental assessment and the Transmission Licence Holder's own environmental management and sustainability policies and practices.
- 1.3.12 The DRP would likely be supported by a Decommissioning Environmental Management Plan (DEMP), or similar document. This would set out all key requirements for environmental management during the dismantling and decommissioning phase to be implemented on-site by the Principal Contractor, similar to the function of the Outline Construction Environmental Management Plan (CEMP) during the construction phase and as outlined in **Volume 4, Appendix 3.4: Outline Construction Environmental Management Plan (CEMP)** in this EIAR.
- 1.3.13 The detailed technical focus of the DRP in relation to environmental mitigation cannot be prescribed at this stage. However, based on an understanding of predicted environmental effects for construction, and current trends in environmental and resource management issues, it is likely that the following would form key focus areas:
 - The influence of historic and projected climate change on the sensitivity and vulnerability of key environmental receptors (and on changes to physical processes such as ground conditions/stability and flooding);
 - Restoration of soils and, where appropriate, reinstatement of habitats;
 - Material circulatory including implementation of measures to achieve high levels of re-use or recycling of aggregate from access tracks and metals from tower structures and conductors;
 - Potential for land contamination from long-term operation of maintenance of the OHL assets; and
 - Seeking opportunities for habitat enhancement and biodiversity net gain as part of the decommissioning process.
- 1.3.14 The specific and detailed requirements for mitigation as part of the DRP would be identified through a process of environmental assessment, at a level compliant with prevailing EIA-related procedures³, and taking account of knowledge of the environmental baseline at the time of any plan for decommissioning. Longer-term reinstatement monitoring measures and corrective action procedures would also be included. These would draw on the state of industry practice and from site-specific monitoring of reinstatement of soils, areas of peat soils, vegetation and other habitats undertaken following construction of the Proposed Development. It is likely that a bespoke Reinstatement Plan would form an appendix to the DRP which would build on the construction phase restoration plan implemented in line with those prepared for construction (see **Volume 4, Appendix 3.3: Outline Site Restoration Plan**).
- 1.3.15 The Transmission Licence Holder would commit to monitoring and review of the DRP at five-yearly intervals through the life of the Proposed Development following its initial preparation to ensure it was regularly updated to reflect asset management plans and industry best practice. The updates would also reflect changes to relevant health, safety, environmental and waste management legislation as tracked by the Transmission Licence Holders' corporate and/or project environmental management system(s).

³ Other relevant environmental consenting requirements, for example those relating to the *Habitats Regulations*, would also be considered where relevant.