

**John Muir Trust
Response to SSEN Fort Augustus –
Skye project consultation
November 2016**



1. SUMMARY

The John Muir Trust welcomes the opportunity to respond to the Project consultation and appreciates the time which has been given by the project staff to inform the Trust. The Trust has not had the time or resource to analyse each route option in detail. At this fairly early stage, our comments are concentrated on strategic and over-arching points, as well as comments about where the line would pass through our property. The Trust looks forward to further consultation when more detail is available.

The strategic case and cost benefit analyses for this project must be fully made and available to the public.

SSEN has not yet made public an adequate case for the project in principle – this must be a priority, as it may be that a smaller capacity, less-damaging project can be selected.

SSEN must demonstrate that alternatives, including sub-sea and undergrounding, have been adequately assessed.

The Trust has considerable concern about those parts of the line which will require steel towers and looks forward to more consideration from SSEN about how to minimise that.

Environmental costs must be considered properly at this early stage – wherever those costs would fall.

The proposals for wooden H poles in the Sections on Skye, and removal of the current line, are re-assuring.

The Trust looks forward to close working with SSEN where the line crosses Trust property.

The Trust view is that it is too early in the assessment and consultation process for one Option to be selected.

More work is required to consider whether another combination of technologies or routes is better.

Any potential impact of the Project on nationally designated landscapes and Wild Land Areas, or other natural heritage designated sites, needs to be carefully assessed and due regard given. The cumulative impact of this project with other infra-structure on the visual and landscape resource of this very sensitive area of the Highlands and Islands must be considered.

2. RELEVANCE OF THE JOHN MUIR TRUST'S EXPERIENCE

The John Muir Trust is the leading wild land charity in the UK whose foremost aim is the protection and enhancement of wild land and wild places. The Trust works extensively, alongside energy experts, on strategic energy and transmission issues because of the extensive impacts that energy developments are having on wild land.

The Trust has two distinct relevant areas of interest and expertise -

- I. The Trust's charitable aim of protection and enhancement of wild land and wild places mean that the Trust has a considerable interest in the entirety of the proposed line, passing as it does through some of the finest and wildest areas of the UK. So the Trust's work is not confined to the areas it owns.
- II. The Trust owns, and manages for conservation aims, the Sconser, Strathaird and Torrin estates on Skye which collectively make up a coherent land mass of 12,000 hectares. The current and proposed transmission lines are located on Trust land in Skye and so the Trust has a very close interest in that area, as well as expertise regarding the land there.

The Trust gained considerable expertise about the strategic technical and economic aspects of transmission, as a leading objector at the Public Local Inquiry (PLI) for the Beaully-Denny, 220km, 400kV transmission line in 2007, and subsequently. To consider the evidence at that Inquiry, the Trust benefited from advice from energy and economic experts including Sir Donald Miller, ex-Chairman of Scottish Power; Colin Gibson, Ex Networks Director of National Grid; and Professor Andrew Bain, Emeritus Professor of Economics. Some of the evidence presented at the Beaully-Denny Public Local Inquiry is very relevant to this Consultation.

3. STRATEGIC ISSUES

The Trust's submission is informed by its experience of considering, with the advice of independent experts, the costs, technical case and environmental impacts of a 400kV electricity line passing through a National Park and sensitive nationally important landscapes – i.e. the 220km Beaully – Denny line. Whilst the proposed line is a 132kV line, with a maximum height of 26m if constructed as an overhead line, it would still have a significant impact on visual and landscape aspects.

Electricity generation and transmission planning and costs should be considered together, and for the whole of the GB electricity network, to achieve the best solution for the national good. Ofgem and the Scottish Government, through its Agencies, have duties including specific environmental duties and are required to ensure adequate assessments have been undertaken where appropriate, to ensure the correct decision-making occurs. SSEN must ensure that they deliver on their statutory duty to the public in a holistic way - considering all significant economic, social and environmental costs.

The Applicant evidence given at the Beaully Denny 400kV 220km transmission line Public Local Inquiry, and the subsequent practical delivery of the BD project, demonstrated inadequate cost-benefit analysis of a major overhead line industry, by the Applicants, including SHET, and Ofgem.

The Trust considers it essential that lessons are learned and, for the Project under consideration, adequate cost benefit studies and comparisons are done and put into the public domain.

Environmental duties. The Trust view is that Ofgem's, SHET's and Scottish Power's environmental duties were not adequately undertaken at Beaully Denny. Indeed, SP is still negotiating the landscape mitigation five years after approval. So it is critical that all parties - Ofgem, SSE and its subsidiaries and Scottish Power - learn from those mistakes, demonstrate the technical and economic need to the public and stakeholders and implement any new transmission with minimal impacts.

4. PROJECT CONSIDERATIONS

Total Systems costs and environmental and social impacts need holistic consideration and lessons must be learned from similar projects.

Whilst the Trust appreciates that SSEN are consulting at an early stage on the aspect of the electricity network which is their remit in this area (the transmission required), it is essential that governments, and organisations licensed by government to undertake nationally significant projects, ensure that they are delivering on their duty to the GB public in a holistic way - considering all significant economic, social and environmental costs.

THE “NEEDS” CASE

A key concern that the Trust has is that the case for this new line has not been demonstrated.

In a 72 page document, the need for the line is discussed in two paragraphs.

The case made is that:

“This network is currently at capacity and, as a result of an increase in renewable energy projects requesting access to the electricity network, there is a requirement to increase the capacity to Skye. This project is driven specifically by the request for connection of the contracted new Glen Ullinish (42 MW) and Glean Eoghainn (25MW) wind farms. This will also improve the resilience of the transmission network between Fort Augustus and Skye.”

Only one of these two windfarms has planning permission as yet. Even with planning permission, many windfarms do not get constructed for one reason or another. The proposed Fort Augustus – Skye line will have very significant impacts and it may well be that this amount of new capacity is not needed. Indeed, with current financial constraints, it seems uncertain that these windfarms will both materialise. The Trust understands the obligation of the transmission network to progress work when a connection is requested. However, there is also an obligation not to construct excessive infra-structure, using public money from consumers. This is being increasingly recognised by Ofgem and National Grid.

SSEN has not yet made public an adequate case for the project in principle and this must be done before a major engineering commitment is approved.

Further, previous experience demonstrates that the initial cost estimates for the project might well increase significantly, thereby undermining the economic basis of the project. In the case of the Beaulieu Denny transmission line, the actual costs more than doubled from the estimate given by Scottish Power and SSE to the Public Local Inquiry. This outcome is in line with evidence which was presented by objectors. Hence, even if there is a case in principle for this Project, SSEN must provide an adequate cost-benefit analysis based on realistic project costs.

It was argued by Sir Donald Miller at the Beaulieu Denny PLI, and is clear in retrospect, that the “East coast” overhead route Sir Donald proposed would have similar or less costs and have less severe impacts on nationally valued landscapes than the approved BD route. Moreover, sub-sea cables are being installed throughout the UK, including in Scotland. This was a technology which was claimed to be too expensive for Beaulieu Denny but both alternative options should have been properly assessed as alternatives and that information made available to the public.

Likewise, for this line, SSEN must demonstrate that all alternatives, including sub-sea and undergrounding, have been adequately assessed.

The lack of a clear technical and economic case for the Project in principle and uncertain cost estimates could lead to unnecessary added costs to electricity consumer bills, which is not in the public interest.

The technical “needs” case must be well-evidenced and in the public domain, unlike the BD situation where the Beaully Denny PLI Technical Assessor said, “***My conclusion is that the Applicants’ technical case for transmission network reinforcement to the full 400kV standard based on a deterministic approach is unconvincing.***” Unfortunately, this evidence came forward so far along the decision- making process that it was not taken on board – as there was no other alternative being put forward by then. Many people now believe that the Application, as presented and subsequently built, should not have been given planning approval. A lesson from the Beaully Denny process, as acknowledged by Ofgem, is that a full and transparent analysis must be undertaken at an early stage.

A further relevant aspect is that it was a condition for mitigation at Beaully Denny that the major construction “tracks”, which are the width of a single carriageway road, would be removed i.e. they were temporary. However, the land owners have very often applied for retrospective planning permission and many of these applications have been approved. The roads are then a permanent scar and many people view them as having a more negative visual impact than the actual pylons and conductor wires. So the lesson from this is that a firm and binding commitment to minimising the residual impacts needs to be made.

5. VISUAL, LANDSCAPE AND CUMULATIVE ISSUES

Any potential visual, landscape or cumulative impact of the Project on nationally designated landscapes, Wild Land Areas or other natural heritage designated sites needs to be carefully assessed and due regard given.

The cumulative impact of this project with other infra-structure on the visual and landscape resource of the Highland and Islands must also be considered.

6. TYPES OF TECHNOLOGY

The Trust has not had the resource to consider, in the required detail, each of the many Options set out in the consultation. So we comment here on the types of technology to feed in to the further deliberations about those Options.

Wooden H poles

Trust staff appreciate the engagement from SSEN project staff which has helped our ability to assess wooden H pole impacts. This allows us to say that, whilst we reserve the right to comment on parts of the line, we hope that this technology can be erected without too much environmental or visual impact. We would expect to be fully consulted about the line where it traverses the Trust Skye properties.

Steel tower pylons

The consultation document is very vague about the requirement for steel towers, rather than wooden poles. However, it is clear that, in SSEN’s preferred Option 1, this will be required in upland areas and in some of the most wild and unspoilt of the UK’s landscapes.

This is of significant concern. Initial assessment suggests that Option 1, as currently described, may not be an acceptable option with regard to environmental, landscape and Wild Land impacts.

Subsea cables

Subsea cables which allow the route to avoid some of the most sensitive landscapes should certainly be considered. If the project need is proven, it may be that a combination of routes which is not currently on the list of Options would be most satisfactory.

Undergrounding cables

The Trust appreciates that undergrounding cables may not be a good alternative to overhead lines, in some circumstances. However, technology has moved on considerably in recent years and so this Option should not be ruled out, at this stage.

Cost, environmental and social impacts need considered in more depth before any Option can be said to be the best. The Trust looks forward to discussing that detail in consultation.

7. SKYE SECTIONS 1 – 3

John Muir Trust land is included in Sections 1-3.

We are re-assured by the fact that these Sections will be wooden H poles and the existing line would be removed.

We would hope that there would, therefore, not be significant impacts in this area. We would expect close consultation with our staff about mitigation and micro-siting in those areas.

8. CONCLUSIONS

It will not be acceptable for public money to be allocated to a potentially environmentally damaging project without all the true costs and benefits of alternatives being considered and available to the public. There are legal duties to fully consider all environmental impacts and to consult the public.

Both SSEN and Ofgem have legal duties to ensure that the environment is correctly protected. This duty allows SSEN to propose, and Ofgem to accept, a more expensive option than “least cost”, if it is environmentally required. This has been clearly demonstrated by the consultation and latest proposals by National Grid on the NW Coast connections, where considerable undergrounding is being preferred through the Lake District National Park.

Moreover, further consideration might allow a smaller capacity, less damaging scheme to progress, as seen in Dumfries and Galloway Strategic Transmission project which was scaled down.

Lessons must be learned from other projects within the UK, and under Ofgem’s remit, – the Beaulieu Denny transmission project, the NW Coast connections project and the Dumfries and Galloway Strategic Transmission project.

Points to consider include the following –

- a. the technical assessment of the need for the project
- b. the appropriate scale of the project e.g. is there a less damaging option
- c. the cost benefit analysis
- d. environmental impacts

7. THANKS TO PROJECT STAFF

The Trust appreciates the time given to the Trust by project staff already which has been very helpful with assessing the impacts of the wooden H pole part of the line. SSEN is to be congratulated on consulting at an early stage with stakeholders. The Trust looks forward to the consultation responses being taken into consideration; further work being brought back to stakeholders and the public for comment; and to working with SSEN.