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Consultation on Transmission Price Control Review 5 (TCPR5)

Scottish Natural Heritage is a non-departmental public body, funded by Scottish Government. Our aims are to promote the care and improvement of Scotland's natural heritage, its responsible enjoyment, greater understanding and appreciation, and its sustainable use now and for future generations.

Thank you for your open letter of 30 July inviting comment on proposals for the Transmission Price Control Review 5.

SNH recognises the need to develop transmission infrastructure which will help enable delivery of Scotland's commitment to reduce greenhouse gas emissions by 80% by 2050. In particular we recognise:

- the importance of the Scotland's renewable energy resources – both terrestrial and marine – in delivering low-carbon electricity.
- the need to develop a 'smarter' grid which accommodates small-scale energy generation and allows for local storage.
- the importance of developing carbon capture and storage technology.

We welcome the inclusion of a category covering 'environmental impact' within the table (Annex A of the consultation) showing indicative primary outputs which might be taken into account in any Price Control action. While the four bullet points shown in that table are important, we would like to see 'visual impacts' widened to 'impacts on landscape and visual amenity', and we would want impacts on biodiversity listed as well. The main impacts of transmission lines (overhead, underground or undersea) and pipelines on the natural heritage include:

- on landscape: intrusion on rural, undeveloped or wild land character
- on visual amenity: of residents, travellers, and those engaged in outdoor recreation
- on biodiversity: habitat disturbance and loss and risks to water quality during construction; risks to birds and habitat fragmentation by creation of corridors during

operation; habitat change from heat losses from underground cable; electromagnetic disturbance from undersea cables.

In addition, we are interested in the contribution made by transmission infrastructure to the reduction in greenhouse gas emissions. We view climate change as the most serious threat to the natural heritage in the medium to long term. We therefore endorse the need for new transmission proposals, not just to minimise their business footprint, but to facilitate the generation and use of low carbon electricity and renewable heat across the UK.

We have considered how such environmental effects might be considered in a very strategic way at the price control stage, and suggest that the following factors should be taken into account.

Natural heritage

Scottish Planning Policy, in paragraphs 125-148, sets out a range of objectives for the planning system in relation to the natural heritage, noting that landscapes and natural heritage form a key component of the high environmental quality which makes Scotland an attractive place in which to live, do business and invest. We consider these objectives, and their marine equivalent, should form the basis of the outputs expected from transmission networks; it would seem to make most sense if the natural heritage criteria against which proposals are judged at a price-control stage are the same as those used within the planning system and in the consideration of Electricity Act Section 37 consents. Key issues are:

Natura sites (paras 134 -136)

- transmission infrastructure should not adversely affect the integrity of any Natura site, unless there is agreement by Scottish Ministers that an exception on the basis of imperative reasons of overriding public interest should apply.

National designations (National Scenic Area, Site of Special Scientific Interest, or National Nature Reserve) (para 137)

- transmission infrastructure should not adversely affect the integrity of such an area, or the qualities for which it has been designated, unless it is demonstrated that alternatives would be unsatisfactory and that the benefits of the infrastructure are such as to clearly outweigh the adverse effects.

National Parks (para 138)

- transmission infrastructure should be consistent with the four aims of national parks in Scotland and with the National Park Plan for each park.

Protected Species (para 143)

- transmission infrastructure should not be detrimental to the maintenance of the population of a protected species at a favourable conservation status in its natural range, and more generally should avoid any adverse effect on protected species unless there is no satisfactory alternative and the infrastructure is required for reasons of overriding public interest. (Protected species include European Protected Species and species protected under the Wildlife and Countryside Act 1981; the precise protection requirements vary with the legislation.)

Fragmentation of habitats (para 126)

- transmission infrastructure should not lead to further fragmentation or isolation of habitats, or should include appropriate action to mitigate any such effect; and should make use of opportunities to restore links previously broken or to restore degraded habitats.

Wild land (para 128)

- transmission infrastructure should not intrude upon areas of wild land character in Scotland's remoter upland, mountain or coastal areas, where such areas are recognised for their wild land value.

Green networks (para 130)

- transmission infrastructure should not detract from the biodiversity, landscape and recreation value of green networks identified and promoted through development plans.

Peat (para 133)

- disturbance of peat and other carbon rich soils should be minimised, and measures taken to restore any affected peatland.

Trees and woodlands (paras 146-148)

- transmission infrastructure should be designed to protect and enhance ancient and semi-natural woodland and other native and long-established woodland with high nature conservation value. Where adverse impacts on this resource cannot be avoided, they should be mitigated as far as is possible, and measures taken to compensate for losses.

In the marine domain, there is a need to apply equivalent natural heritage criteria, though a clear statement of marine planning policy is still in gestation. In outline we propose:

- the criterion above for Natura sites should apply
- the criterion for National Designations should apply to other Marine Protected Areas.
- the criteria for Protected Species should apply (these are of particular importance for cetaceans and other marine European Protected Species).
- a list is also under development of 'Priority Marine Features' which comprise around 50 habitats and species of greatest conservation importance. Transmission development should not adversely affect the conservation status of such Priority Marine Features.

Greenhouse gas reduction

In relation to greenhouse gas reductions, we suggest that the following should also be required as primary outputs, and on a quantified basis:

- transmission infrastructure should be such as to minimise its carbon footprint, taking account of:
 - construction materials and processes
 - disturbance of peatland and carbon-rich soils
 - maintenance and operational activities
 - the carbon associated with energy losses during transmission

One of the aims of new or upgraded transmission infrastructure should be that it facilitates a move towards low-carbon electricity supply. A primary output might therefore be:

- transmission infrastructure should facilitate a reduction in carbon intensity of electricity supplied by the network, in line with the profile recommended by the UK Climate Change Committee¹.

This factor will be of particular relevance for electricity transmission proposals in Scotland where a prime role of new infrastructure may be to enable access to new renewable energy resources.

The above offers a number of key points against which environmental issues associated with a transmission proposal might be assessed at price control stage. We trust these views are helpful, both in Scotland and more widely if appropriate.

We trust that these thoughts may feed into the work of the TPCR working group on environmental issues. We are unable to commit to SNH representation at a series of meetings of this working group, but we have already input by phone to Anna Kulhavy, and would be happy to comment if that were helpful on any output emerging from that group.

If you would like to discuss this response further, please contact myself tel 01738 458635, bill.band@snh.gov.uk or Clive Mitchell tel 01738 458623 clive.mitchell@snh.gov.uk in the first instance.



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¹ UK CCC (2008) *Building a Low Carbon Economy, Chapter 5 Decarbonising Electricity Generation*. <http://www.theccc.org.uk/pdf/7980-TSO%20Book%20Chap%205.pdf> (Accessed 15 September 2010)