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Dear Ms Berge

Consultation on Scottish Hydro Electric Transmission's proposed transmission project between Caithness and Moray

I write in response to OFGEM's current consultation exercise for the above SHET grid transmission link. This follows on from the meeting held in Inverness on 30 April 2014 to discuss the project and the wider consultation exercise which closes on the 28 May 2014.

The principal project progressed by SHET to date involves the development of a HVDC cable from a converter station by Spittal, Caithness to Blackhillock, by Keith, Moray via a direct subsea cable across the Moray Firth.

The need for this cable is to allow the continued expansion of renewable energy development across the North of Scotland, both onshore and offshore. The Highland Council is very supportive of this investment as a result. This is also recognised from the fact that planning permission has already been granted for the Caithness substation, following extensive public consultation and Environmental Impact Assessment (EIA), and support has been expressed for the underground cable from the substation to the Caithness coastline and beyond.

The Highland Council is not supportive of the alternative route being proposed involving a land based overhead option from Caithness to Moray. The following reasons for this view are set out, in no priority order:

Landscape and visual impact

The development of a DC underground / subsea route as opposed to an overhead AC route would have a significantly reduced landscape and visual impact. This is significant given the number of important landscape designations that prevail across and adjacent to the likely routes of an overhead line including National Scenic Areas, Regionally Important Special Landscape Areas, and emerging land possessing nationally valued wilderness qualities (Search Areas of Wild Land / Core Areas of Wild Land).

Cumulative Visual Impact including Sequential Impact

The communication corridors between the principal communities in this area are already well used by grid line, road lines, rail lines, and other infrastructure such as mobile and other communication masts and onshore renewables. Furthermore the terrain makes these corridors quite narrow as a consequence of the local topography, including hills, lochs, river gorges and coastline. The addition of significant overhead line infrastructure, of a greater scale than currently exists would further exacerbate the wirescape and, given the rural nature of the countryside and its value in landscape terms to the area's identity and economy, the option for a land routing would be the least favoured.

Restricted Capacity of Substations

This is an important consideration given the planned and ongoing expansion of the grid network from the North and West Highlands particularly at Balblair by Beauly.

The recent development of the Beauly Denny Line and the proposed Western Isles DC line has for example highlighted cumulative impacts on an existing substation (Balblair) which has resulted in unacceptable operational noise levels on nearby residential properties and tourist businesses. Enforcement action has had to be undertaken and appropriate mitigation investigated and installed. The problem remains to be fully resolved although we are confident it can be.

The developments at Balblair were only approved by Scottish Ministers following provision of substantive wirescape mitigation involving the undergrounding of almost all lines within a minimum of 2km of the substation. Future development of the grid in this locality would have to sustain this initiative, which would not be easy to achieve.

The above are two examples of the difficulties of constantly relying on the expansion of existing substations. New delivery mechanisms are needed, such as the subsea cable to alleviate the pressure on existing infrastructure which is to be retained and on which there are already development pressures associated with further local development projects and expansion of approved schemes.

By way of further example, discussions are already underway for a new 400kV route transmission grid between Balblair (Beauly) and Blackhillock, which is to provide an additional link, rather than a replacement link. Routing of overhead lines and cables south of Balblair via Inverness and then eastward has raised many concerns which are currently being discussed between the Highland Council and SHET. The route will also be affected by the dualing of the A9, and possibly A96, adding further impact to the important historic, cultural and landscape features.

Nature Conservation / Natural Resources / Cultural Resources

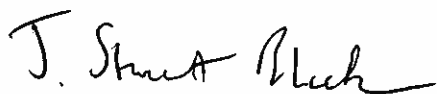
Our response has not highlighted the likely impacts of an additional overhead line on nature conservation interests, woodland interests, wild land, water and peat resources, historic environment, ancient monuments, etc. of the area. It is hoped that the views of relevant Government Agencies, particularly Scottish national Heritage, would be sought and a balanced assessment of options undertaken.

Technical and Procedural

From our knowledge and experience of the area the Highland Council believes that the sub-sea cable route would be a significantly better option. HVDC technology is regarded as a technically sound approach to grid transmission enhancement, and is in use routinely worldwide, including for cross channel links between the UK and the European Mainland. The consents are largely in place for this routing option and could deliver a transmission connection in early course. Furthermore, permissions for existing windfarms will expire if a further eight years were to elapse before a connection was possible given the timescales expected if the overland route was to be pursued. An overland and overhead routing option would need to be appropriately assessed under the EIA process, presented and progressed through planning procedures and an inevitable Public Local Inquiry. The delay over the provision of this investment link will have a consequential impact on the current investment programme into renewable energy schemes in the North of Scotland. As well as the impact upon onshore renewables from any potential delay in the development of the additional transmission infrastructure, the development of marine renewables in the Pentland Firth and Orkney Waters, a significant resource for the Highlands and Islands, could be jeopardised if there is a delay in the development of the transmission grid infrastructure required to get this resource to the markets where it is required.

We recognise the role of OFGEM in ensuring the best deal for the consumer when considering new infrastructure projects. In this particular instance the Council believes that the subsea option proposed by SHET is the best solution, for all the reasons outlined in our submission. The time delay in consenting an overland/overhead line solution alone, makes it an unacceptable solution. The reinforcement is vital to the development of the renewable energy resources of the Highlands and Islands and we would urge you to support the proposed subsea High Voltage Direct Current (HVDC) cable link proposed by Scottish Hydro Electric Transmission.

Yours sincerely



J Stuart Black
Director