

RSPB SCOTLAND
Scotland Headquarters
2 Lochside View, Edinburgh Park
Edinburgh, EH12 9DH
Tel: 0131 317 4100
www.rspb.org.uk
Alexa.Morrison@rspb.org.uk

SENT BY EMAIL: SWW@ofgem.gov.uk

Dear Sir/Madam,

Ofgem Consultation on Scottish Hydro Electric Transmission's proposed transmission project between Caithness and Moray in northern Scotland

We welcome the opportunity to comment on SHE-T's proposed transmission project between Caithness and Moray. RSPB Scotland believes that climate change is a major threat to wildlife, therefore we strongly support renewable energy in the right places. We recognise that growing renewable generation in the North of Scotland creates a need for increased network capacity.

The RSPB is signatory to the 'European Grid Declaration' which recognises the need to develop grid networks to accommodate expansion of renewable energy, and equally important need to reverse the loss of biodiversity. We support the hierarchy of priorities set out in the Declaration to: (1) build only infrastructure that is needed (reduce energy demand); (2) minimise new development (e.g. upgrading); (3) mitigate impacts; (Last) compensate for unavoidable impacts.

We have considered the implications of a sub-sea cable versus a new overhead line around the Moray Firth, and consider that a sub-sea cable is likely to be more sustainable, as:

- SHE-T has planning and other necessary consents for the subsea cable and can deliver by 2019. The landward route, for which necessary consents would have to be obtained, would delay delivery and potentially inhibit renewables development in the North of Scotland. Wave and tidal technologies could be particularly affected, with loss of global competitive advantage and emissions reduction potential. RSPB has no significant environmental concerns in relation to the subsea cable – not precluding the need for impacts to be minimised and adequately mitigated. Any new generating capacity facilitated by the cable must also be subject to robust environmental assessment and sensitively sited.
- A new overhead line would involve passing through designated sites as well as affecting biodiversity on non-designated sites, which is likely to lead to significant concerns and potentially objections from environmental groups including RSPB.

I hope you find our comments helpful in progressing with your plans. Please do not hesitate to contact me should you wish to discuss this further.

Yours faithfully,

Alexa Morrison
Conservation Policy Officer, RSPB Scotland