



Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland
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Kersti Berge
Ofgem
9 Millbank
London
SW1P 3GE

Date: 28 May 2014

By email only: SWW@ofgem.gov.uk

Dear Ms Berge

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

Your consultation letter dated 2 April 2014 requests views on SHE Transmission's proposed transmission project between Caithness and Moray. SHE T's proposal is designed to include a subsea cable. Your letter also summarises analysis of alternative onshore options to reinforce the transmission system in northern Scotland. Two of the alternative options include a new 275kV overhead line option from Dounreay to Beaully.

As the Scottish Ministers' statutory adviser on the natural heritage we have provided advice to the Scottish Government on SHE T's subsea cable proposal and related applications for onshore elements. We would also be statutory consultees on any Section 37 application for an overhead line alternative. We engage with developers at the pre-application stage of proposals and so we have been in discussion with SHE T regarding the Caithness to Moray subsea cable for a number of years.

We understand that a range of factors will be considered by Ofgem in assessing SHE T's Needs Case and in comparing the subsea option with onshore options proposed in your letter. In order to assist with consideration of environmental issues we have considered the main potential impacts of an overhead line as set out below. This information is based on a short review of readily available information and experience of other overhead line projects in northern Scotland. We also provide brief comments regarding the potential impacts of a subsea route. These impacts are better understood as the subsea project has been subject to an Environmental Appraisal.

1. Potential impacts of an overhead line from Dounreay to Beaully

For the purposes of our response we have assumed that a new 275kV overhead line would follow a route close to that of the existing Dounreay to Beaully 132kV overhead line and would be supported by steel lattice towers. We have also assumed that the existing 132kV line would be dismantled following commissioning of the new line.



INVESTOR IN PEOPLE

Scottish Natural Heritage, Great Glen House, Leachkin Road, Inverness IV3 8NW
Tel: 01463 725000 Fax: 01463 725067
e-mail: David.Law@snh.gov.uk
www.snh.gov.uk

1.1 Protected Areas

1.1.1 Special Protection Areas (SPAs)

The possible route runs close to or within a number of SPAs classified for their bird populations as follows:

- Caithness and Sutherland Peatlands SPA (within site)
- East Caithness Cliffs SPA
- Dornoch Firth and Loch Fleet SPA (within site)
- Strath Carnaig and Strath Fleet Moors SPA (within site)
- Morangie Forest SPA
- Novar SPA
- Cromarty Firth SPA
- Inner Moray Firth SPA

Further information on these and other protected areas mentioned in this letter is available on SiteLink: <http://gateway.snh.gov.uk/sitelink/index.jsp>.

A new transmission line on this route is likely to result in increased mortality of SPA qualifying bird species through collisions with conductors and earthwires. The impact of collision mortality on SPA bird populations would have to be fully considered in a Habitats Regulations Appraisal (HRA), but it appears probable that the proposal is likely to have a significant effect on the majority of the SPAs listed and information would be required to allow an appropriate assessment to be carried out (see comments below regarding bird survey requirements).

An HRA for a potential transmission line would have to include consideration of cumulative collision mortality to SPA qualifying bird species. This issue is likely to be particularly relevant to the Caithness and Sutherland Peatlands SPA due to the predicted cumulative collision mortality from consented or proposed onshore wind farms.

Cumulative collision mortality with the consented offshore wind farms in the Moray Firth would also have to be considered. Between Dunbeath and Helmsdale the possible route runs relatively close to the East Caithness Cliffs SPA and so may result in increased collision risk to the great black-backed gull and herring gull qualifying features of this site. Predicted cumulative collision risk to these species from the Moray Firth wind farms could be a constraint on development of a new overhead line on this section of the possible route. In some locations cumulative collision mortality with other transmission lines may also be a significant issue, for example in and around Strath Carnaig and Strath Fleet Moors SPA.

Where the route might cross SPAs, the potential loss of habitat which supports SPA qualifying species within these sites would require assessment.

1.1.2 Special Areas of Conservation (SACs)

The possible route appears likely to cross two SACs which are designated for qualifying habitat:

- Caithness and Sutherland Peatlands SAC (Shielton Peatlands section)
- Mound Alderwoods SAC

Impacts of constructing a new line on qualifying habitats would require assessment through the HRA process. If a new wayleave was required across the Mound Alderwoods SAC this would be likely to have a significant effect on the alder wood qualifying interest and it seems probable that woodland clearance would have an adverse effect on the integrity of the site.

1.1.3 Dornoch Firth National Scenic Area (NSA)

The possible route would either run through or very close to part of the Dornoch Firth NSA. An assessment would therefore be required which considers the effect on the integrity of the NSA and the qualities for which it has been designated.

1.2 Assessing impacts on birds

A new overhead transmission line will result in an increased risk of collision mortality to birds, including qualifying species of SPAs, as indicated above. A number of sensitive bird species not associated with SPAs are also likely to be affected by this increased collision risk. In order to assess collision risk, vantage point survey work along the possible route will be required. SNH's draft guidance on assessing the impact of overhead power line proposals on birds indicates that survey work for new powerline proposals should extend over two years.

1.3 Landscape and visual impacts

Outside the Dornoch Firth NSA the possible overhead line crosses a number of landscape character types which have varying capacity to accommodate development such as new overhead powerlines. Areas likely to have lower capacity to accept this type of development include two Special Landscape Areas identified by Highland Council. The possible route may lie close to an area identified by SNH as a Search Area for Wild Land (SAWL) and a Core Area of Wild Land (CAWL). The impact of a possible route on the wild land character of this area would require assessment.

2. Potential impacts of a subsea route

The potential impacts of the proposed subsea connection from Caithness to Moray have already been established and we have provided comments to Marine Scotland on these. A number of mitigation measures have been agreed to minimise impacts on natural heritage interests. Some issues regarding the impacts of rock placement and the landfall at Spey Bay require further discussion between SSE, Marine Scotland and SNH, but, in our view, these impacts are amenable to mitigation.

3. Potential impacts of a link from Beaully to Blackhillock

Two of the options set out in your letter include a possible 400kV overhead line from Beaully to Blackhillock (BB400). We have taken part in preliminary discussions of this possible project with SSE. While the environmental implications of this proposal will vary considerably depending on the route selected, any new 400kV overhead line between Beaully and Blackhillock will have a number of significant and potentially major impacts.

4. Conclusion

As indicated above, extensive survey and assessment would be required in order to establish the significance of natural heritage impacts of a possible overhead line from Caithness to Beaully. Due to the potential for increased collision risk to sensitive bird species, including qualifying interests of SPAs, it is likely that mitigation measures would be required along parts of the route. Due to cumulative collision risk to some qualifying species there might remain a potential for adverse effect on the integrity of some SPAs even when mitigation is taken into account.

I hope these comments are useful. Please contact me if you have any queries regarding this response.

Yours sincerely

David Law
Senior Casework Manager
David.Law@snh.gov.uk
Tel: 01463 725220