Initial SSEN Transmission response to consultation feedback received for the proposed Spittal - Loch Buidhe - Beauly 400kV Reinforcement

- **The Reinforcement is part of GB wide programme of works to deliver Government targets**
- **It will help deliver net zero and secure the country's future energy independence**
- **In response to local feedback, we have extended the consultation period until 14 April**

We would like to thank all stakeholders who have taken the time to provide their feedback on our proposals to develop a new 400 kV overhead electricity transmission line between Spittal, Loch Buidhe and Beauly, which includes new substations at each of these locations.

The Spittal - Loch Buidhe - Beauly 400 kV Reinforcement consultation also seeks views on proposals to develop new High Voltage Direct Current (HVDC) Converter Stations at both Spittal and Beauly. We are proposing to co-locate these with the proposed new substations, in part to reduce their cumulative impacts and to minimise the amount of new infrastructure required to connect them to the existing Transmission Network. These Converter Stations are required as part of plans to develop subsea HVDC links between Spittal and Peterhead, and between the Western Isles and the Beauly area.

Following an initial review of the feedback received so far, we wanted to take this opportunity to address some key themes which have been identified.

Consultation timescales

We understand that these proposals are significant and to acknowledge the extent of interest in the projects, and in response to calls for an extension to the consultation period, we have decided to extend the consultation deadline until Friday 14 April. We hope this will allow all stakeholders with an interest in the project sufficient time to provide feedback.

The feedback received will help inform the refinement of route options and subsequent route alignments; and inform the proposed substation and Converter Station site locations, which we will further consult on later this year.

We acknowledge that these proposed projects will have an impact on local communities and feel that it is important to explain further why this infrastructure is required.

Need for the project

These projects, alongside several other major network upgrades planned in the north of Scotland, are part of a GB wide programme of works that are required to meet UK and Scottish Government energy targets and there is a clear expectation from Government and the energy regulatory, Ofgem, that these projects will be delivered by 2030.

More specifically, these projects are needed to deliver Government 2030 renewable targets and follow the publication in April 2022 of the UK Government's British Energy Security Strategy (BESS)[1].

The BESS set out the UK Government's plans to secure the country's future energy independence by removing the dependence on, and price exposure to, volatile global wholesale gas markets. This will be achieved by accelerating the deployment of homegrown and affordable low carbon electricity

[1] https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-strategy

generation, together with accelerating the enabling electricity network infrastructure required to connect and transport this power. The BESS included an increased ambition for offshore wind of 50GW by 2030, up from the previous target of 40GW.

To enable the connection of that 50GW of offshore wind by 2030 target, the GB Electricity System Operator (the ESO), working in collaboration with the three GB Transmission Owners, developed what is known as the 'Holistic Network Design' (the HND)[2]. This sets out the onshore and electricity transmission infrastructure required across GB to deliver this UK Government target, which includes these projects.

Then in December 2022, the energy regulator, Ofgem, approved the need for these projects as part of its Accelerated Strategic Transmission Investment (ASTI)[3] framework decision.

As well as helping achieve UK and Scottish Government 2030 targets, deliver a pathway to Net Zero and secure the country's future energy independence, these reinforcements will also collectively support the creation of significant numbers of jobs across Scotland and the UK, as well as providing significant economic value across the country.

Whilst delivering this critical national infrastructure by 2030 requires an acceleration of the project development and delivery phases, we remain fully committed to working closely with the local community and wider stakeholders to help inform its design. We would like to reassure stakeholders that no parts of our established project development process will be missed.

Project status

The Spittal - Loch Buidhe - Beauly 400kV Reinforcement project remains in the early stages of development and no specific overhead line routes or alignments have been identified. We are currently seeking feedback on our currently identified 1 km wide potential route options.

To support the accelerated project development required to deliver this reinforcement, we have adopted sophisticated software to help narrow down potential viable routes, allowing us to consider a wide range of factors, including the proximity to homes, villages, and towns; historical landmarks, features and landscapes; and the many environmental designations along its route. The outcome of this analysis was further assessed and validated by desk and field-based studies, which established a shortlist of the most viable options, as presented in our consultation events and materials. This ongoing analysis will continue throughout the development phase.

Similarly, the new substations and HVDC Converter Stations are also the subject of consultation and at the early stages of development. We have to date consulted on our preferred sites based on short lists of options, which have been narrowed down following environmental and technical engineering assessments.

Timeline for overhead route and alignment decisions

The development of a preferred route for the new overhead line is extremely challenging, given the volume of constraints between Spittal and Beauly and this will be done iteratively. Some sections which

[2] https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd
[3] https://www.ofgem.gov.uk/publications/decision-accelerating-onshore-electricity-transmission-investment

are less constrained will be quicker to confirm but we recognise that there are sections of the route which are more sensitive, for many reasons, and will require further significant consideration.

The process of designing the actual route alignment of the new overhead line will take place over the course of the next 8-10 months as more detailed information becomes available. This will be reflective of a range of factors, including feedback to the consultation and ongoing dialogue, all of which we are fully committed to consider.

Cost and alternative technology considerations

We would like to take this opportunity to respond to feedback received indicating there is a perception that proposals for overhead lines are only being pursued on financial grounds and that overhead lines are more profitable.

The cost of investing in the electricity transmission network is ultimately paid for by GB electricity consumers and it is therefore important that cost is a key consideration. However, it is not the case that overhead solutions are being progressed solely on financial grounds, or that they are more profitable for SSEN Transmission. As a regulated business, the return on investment, or profit, SSEN Transmission can make is set by Ofgem as part of its regulatory framework, regardless of the technology employed.

In relation to the call for the use of underground cabling, there are a number of environmental, technical, and operational constraints associated with undergrounding at extra high voltages, particularly at 400 kV, which make this option extremely challenging to deliver in many areas of Scotland.

Underground cabling is highly sensitive to ground conditions and terrain. There can be significant and lasting environmental impacts and future land use constraints associated with undergrounding; together with the technical challenges of operating, maintaining and in restoring power in the event of a fault. It is also acknowledged that undergrounding is considerably more expensive, both to install and maintain, the costs of which will be borne by GB consumers.

Managing and mitigating environmental impacts

As a responsible developer, we would like to reassure stakeholders that we take our environmental responsibilities extremely seriously and follow a mitigation hierarchy of ‘avoid, minimise, mitigate and restore’.

We are committed to deliver Biodiversity Net Gain (BNG) on all our projects; as well as compensatory planting for any trees felled during the construction phase, where possible with native species. Robust policies are also in place to manage and mitigate any impacts on irreplaceable habitats, like peatland and ancient woodland.

All consent applications will be accompanied by a detailed Environmental Impact Assessment (EIA) Report which will consider impacts on a wide range of environmental topics, together with providing mitigation requirements.

Stakeholder Engagement

Finally, we would ask all stakeholders to help ensure engagement and communications of all types are conducted in a respectful and constructive manner. Regrettably, there have been several examples of

verbal abuse and physical threats of a personal nature directed towards members of our team. This type of behaviour will not be condoned and, if necessary, will be reported to the relevant authorities.

We remain committed to an open and inclusive approach to stakeholder engagement throughout the development and delivery of all of our critical national infrastructure projects and will consider all feedback from those who are seeking to constructively engage in the process.

Whilst we fully accept that our proposals will have an impact on the landscape and local communities and understand not everyone will be accepting of this, we are committed to work with those willing to engage in an appropriate and constructive way to help minimise these impacts.

Next steps

We have already started to assess the feedback received from the public events and statutory authority presentations and this will continue, to help inform the route selection.

Alignment options will be ready to present towards the end of the year, with further formal public and statutory consultation planned at this stage. Information received between now and that time will continue to inform the design of those alignment options.

A frequently asked questions (FAQ) document is currently being prepared to further address the feedback received and a detailed Report on Consultation will also be published, following the consultation period, to explain how feedback has been considered to inform the more detailed network design. Where we are unable to respond positively to feedback received, we will ensure we explain the reasons why that is the case.

The next round of formal consultation is planned towards the end of 2023, but we will continue to engage with stakeholders between now and then as we further refine our plans.

For more information, please visit the dedicated project webpage:

https://www.ssen-transmission.co.uk/projects/project-map/spittal--loch-buidhe--beauly-400kv-connection/