<u>BRIEFING NOTE FOR MSPs – ELECTRICITY TRANSMISSION IN THE NORTH OF SCOTLAND</u> APRIL 2024

OUR POSITION

This note is prepared on behalf of the communities of Garve, Marybank, Scatwell and Strathconon, Strathpeffer and Contin. It is endorsed by the community councils of each of these locations. We recognise the threat that climate change means to our planet and we support the need to move away from fossil fuels. However, we do not believe that this threat provides the electricity industry with the right to ride roughshod over the wishes of these communities. Our economy relies heavily on the beauty and wild nature of our countryside to drive tourism. Little consideration, if any, seems to be being given to the impact on our communities and our economy. We call on our elected members to represent the concerns and views of our communities.

KEY ISSUES

CONSULTATION PROCESS HAS BEEN VERY POOR – SSEN'S APPROACH IS 'DECIDE AND DEFEND' INSTEAD OF CONSULTATION

SSEN has approached their consultation process claiming it is very important to them and it is where they are able to gauge the impact on communities. We have met with SSEN on three occasions, held a walk out along an alternative route through our area and attended two consultation events. At each of these events, SSEN has presented their "preferred routes" and preferred option of an overhead line. Despite many platitudes advising that they are listening, they have not changed a thing. They have adopted a 'decide and defend' approach rather than a real consultation.

We have asked repeatedly for additional information, which they have promised to deliver – mainly documents that they should have readily available – and we are still waiting.

CRITERIA USED TO SELECT ROUTES DO NOT INCLUDE ANY THAT REALLY CONSIDER THE IMPACT ON COMMUNITIES

SSEN accepted in our first meeting with them on 2 May 2023, that their criteria for selecting routes includes only one that attempts to measure the "impact on communities". They require the cables to be at least 170m from houses. Ten months later in late February 2024, they advised us that new criteria are being considered by the industry that will measure "impact on communities" better but that any new criteria will not be ready in time for use on this project. This is wholly unacceptable. How long does it take for an industry with huge resources to develop and introduce new criteria? We will be living with the consequences of this lack of action on the part of SSEN and the wider industry for a generation.

COST IS CLEARLY SEEN BY SSEN AS THE OVERRIDING FACTOR IN DETERMINING ROUTES

SSEN estimate the cost of this project to be £1.1bn. This cost will be placed on SSEN's Regulated Asset Base and will be paid for by approx. 60 million electricity consumers across the UK over a period of at least 40 years. Addressing the concerns of the communities affected may give rise to additional cost but under such a payback model, the actual impact on individual consumers is unlikely to amount to as much as a £1 per consumer per year. Capital cost, while important, should **NOT** be the only driving factor in determining the best solution; overall best value is important.

SSEN'S RAG (RED/AMBER/GREEN) ASSESSMENTS ARE FLAWED

The criteria they use are subjected to a RAG assessment where each criterion is judged to be either red, amber or green (RAG). The process relies on the relative weights given to the criteria and this weighting is the judgement of SSEN employees with no input from the communities affected. Recent RAG assessments published by SSEN have shown that their assessment is driven by cost rather than issues such as designated or restricted areas of land or those with heritage designations. These assessments have also shown that potential third-party developments that do not even have planning permission yet are given a high weighting, again due to the potential compensation costs involved, i.e. costs are the determining criterion.

No consideration is given to the fact that people will have to live with these transmission lines for many decades to come.

SSEN HAS PROVIDED NO JUSTIFICATION TO SHOW HOW THE DECISION WAS MADE THAT A 400kV OVERHEAD LINE (OHL) WAS NEEDED.

We have asked SSEN to provide us with the documentation that shows how they have translated the requirements of the Holistic Network Design (HND), produced by National Grid, into a 400kV OHL. According to SSEN's own processes, there should be documents readily available to show how this has been determined but as yet we are still to see the documents. What was the brief provided to SSEN and by whom? Where are the documents required by their processes?

THE SOLUTION COULD BE DC AND THEREFORE COULD BE BURIED, SUBSEA OR A FORM OF RE-DEVELOPMENT OF THE EXISTING TRANSMISSION CORRIDORS

During our first meeting with SSEN we challenged the need for an OHL suggesting that subsea or buried cables would be a better solution. All but one of the reasons we were given for choosing the OHL solution were linked to cost. The only reason given by SSEN that did not relate to cost, was that SSEN had an obligation to allow connections from wind farms and other generating sources to this new line. We have since discovered that any connections from wind farms, etc. can only be made at the nodes along the line i.e. Spittal, Loch Buidhe or Beauly. This means that the lines between these nodes are running point to point with no intermediate connections which means that they can be DC instead of AC. If the cable is DC, then the cables can be buried as they are doing with the new proposed line from the Western Isles to Beauly. This is extremely important as SSEN has clearly misled us and has promoted a solution which is clearly not the only option available.

STRESSED AND IGNORED

The lack of support we have seen from our elected members has left the communities feeling deserted and ignored. We believe our elected members should be speaking up on our behalf. Members of our communities are worried, stressed and no longer trust SSEN.

RECOMMENDATIONS

We ask the Scottish Government to instruct SSEN to

- Reset and restart their consultation process,
- Provide the information that has been asked of them that shows that the overall best way of
 meeting the requirements of the Holistic Network Design is a 6GW 400kV OHL from Spittal to
 Beauly,
- Engage with the local communities affected by working with them on a co-design process where the communities have the opportunity to input meaningfully to assessments, design decisions, etc. that affect their livelihoods and lifestyles.

- Adopt criteria that consider the impact on communities within their RAG assessments and consider the benefits and disbenefits to the economy of the communities affected by the works.
- Revisit their design to consider seriously other solutions which could include a DC line buried between Spittal and Beauly.