

Skye Reinforcement September 2021-November 2021 consultation

Response from the John Muir Trust

Questions

Q1. Have we adequately explained the need for this Project?

Yes. We understand the need for this project and are responding as a landowner on Skye, responsible for land that will be impacted by the proposed development, and as a consultee.

Q2. Are you satisfied that our approach taken to select the proposed route (in Sections 2 and 3), preferred alignment and design solution has been adequately explained?

We welcome undergrounding the cable for 14 km around the Cuillins NSA as mitigation of the significant landscape and visual impacts that the OHL would otherwise have. In our earlier submission we asked SSEN Transmission to consider which parts of the route could be undergrounded to negate what would otherwise be significant landscape and visual impacts and it is clear, from the proposal to underground the line as it passes the Cuillin Hills NSA, that SSEN Transmission listened to stakeholder feedback, so thank you for that. However, we do have some reservations and concerns as to the carbon emissions that will be associated with this work and the ecological impacts to habitats which we mention below.

On the rationale for undergrounding part of Section 2 of the line as it passes the Cuillin Hills, this is explained in Appendix 5 'Landscape and Visual Appraisal of Baseline OHL Alignment in Section 2 – Glen Varragill Forest (North of Sligachan) to Broadford Substation'. Paragraph 5.1.5 clearly states undergrounding the cable is considered the mitigation option that will prevent significant visual impacts from being experienced and lead to a 'net improvement' after the removal of the existing 132 kV wood pole OHL. This concurs with NatureScot's advice (as summarised in the consultation responses document) that the steel lattice structures around the Cuillin NSA would result in significant visual and landscape impacts and the conclusion in Appendix 5 that the impacts were predicted as being significant.

We have noted the need for above-ground sealing end compounds at either end of undergrounded sections and that siting these can result in visual and landscape impacts depending on where they are. SSEN Transmission could consider the non-technical solutions to screening and reducing visual and landscape impact. Measures such as native woodland planting or allowing natural regeneration could be options for screening the sealing end compounds and for reducing the visual contrast of the steel towers in a predominantly natural landscape. The sites for planting native woodland however need to be assessed as suitable for planting.

Whilst we welcome undergrounding the cable for part of Section 2, this mitigation option does raise questions about the ecological impacts from construction as well as the carbon costs from extracting and displacing peaty soils. We are not sure if the carbon costs of undergrounding the line are higher or lower or about the same as for installing the steel lattice towers, foundations and tracks. We hope these costs have been considered. We

know that SSEN Transmission has already stated in your Sustainability Action Plan an intention to reduce Scope 1 and 2 carbon emissions by 2030 by 45% compared to the 2018/19 baseline. As a major project, we would expect the carbon emissions associated with groundwork preparation, installation and operation of each section of the line to have been considered and for SSEN Transmission to be seeking to reduce emissions wherever possible.

Q3. Are there any factors, or environmental features, that you consider may have been overlooked during the preferred route and alignment selection process?

For the Section 2 line that is proposed as underground cable, it would have been helpful to have seen a map showing the additional fencing along the cable and any additional tracks that are going to be required. A fenced cable line around the John Muir Trust's Sconser property could be a barrier to accessing the property for our land team but also for the local graziers as well as visitors. We have been reassured these conversations will follow and look forward to discussing with you. It would also have been helpful to have a bit more interpretation of how access to popular mountain routes will be maintained during construction and whether routes will remain the same after construction has concluded.

There will be different practical ways to install the undergrounding cable and some methods may reduce disturbance to habitats and the ground compared to others. We encourage SSEN Transmission to consider the different methods for laying cables and to choose the option that will support better long term outcomes for biodiversity and the land's recovery. From our limited understanding, opting to run the cables through a duct inserted into a trench could enable faster reinstatement (and therefore faster recovery of habitats) than opting to dig a trench, lay cables and pack special material or aggregate around them before reinstating the trench.

For Section 4, where a relatively short stretch of the Section proposed goes through the northern part of the Kinlochhourn-Knoydart-Morar WLA to the north-west of Loch Hourn along the route of the existing OHL, will SSEN Transmission consider any options for screening the visual impact of the steel lattice structures for this Section? Will SSEN Transmission complete a Wild Land Impact Assessment for this section of the route so that impacts on the Wild Land Area can be understood and mitigation can be properly considered?

Q4. Do you have any other comments in relation to the drivers for the project, related to the transmission infrastructure requirements, or about the preferred alignment and design solution?

As a driver of the project is supporting the UK and Scottish Governments transition to net zero emissions, it would be a demonstration of good practice to see SSEN Transmission presenting the carbon emissions associated with the different options proposed. We are unable to evaluate whether undergrounding the cable around the Cuillin Hills will result in the release of more carbon dioxide emissions than constructing an above ground transmission line with steel towers. For the planning application stage, if appropriate, it would be very helpful to have the carbon costs for each section calculated and a mitigation

plan for how carbon emissions will be kept to a minimum during the construction and post-construction phases. The reinstatement of temporary tracks and re-use of existing tracks will be a way to reduce the ecological harm and the carbon costs of this development. We would welcome more information on everything SSEN Transmission are going to do to minimise the carbon and environmental costs of this development for each section of the line.

Another important consideration at every stage of planning the project is SSEN Transmission's commitment, as stated in your Biodiversity Action Plan, to 'Achieve biodiversity 'No Net Loss' on new projects gaining consent in 2020 onwards' and 'Achieve biodiversity 'Net Gain' on projects gaining consent in 2025 onwards'. As this project is expected to gain consent after 2020, but before 2025, with construction timetabled to begin in summer 2023, we would expect it to be accompanied with a plan for ensuring there is no biodiversity net loss whilst looking for where there are opportunities for gains (given this is the direction of travel for SSEN Transmission's projects). The John Muir Trust would be happy to support SSEN Transmission with advice on how to ensure no net loss of biodiversity locally on Skye and in particular, could inform SSEN Transmission's planning for achieving biodiversity net gain by sharing how we are already working to restore habitats to land at our Sconser property.

On a practical note, we wish to raise the importance of design and construction works proceeding in a way that protects private water supplies to homes on the Sconser estate. Several properties on the estate have private water supplies with water sourced from the surrounding hills and land. The ground that will be disturbed during construction of the Section 2 line is likely to overlap with watercourses that supply water to homes which means there is a risk of digging through or under watercourses that are providing water supply to homes with unintended consequences such as water contamination or loss of supply. We would welcome a commitment from SSEN Transmission to finding reactive solutions to any problems and issues arising at a practical level that interfere with quality of life of people living on the estate and the land management of the estate, particularly with respect to successfully maintaining water supply, along the route during construction.

On a final note, we are happy to be contacted to discuss any mitigation plans and habitat restoration plans that SSEN Transmission are developing for along the route.