

**SSEN Transmission submission**  
***NPF4 National Development Call for Projects***

**Name of proposed national development:** High voltage electricity transmission network.

**Brief description:** As the Transmission Owner (TO) in the north of Scotland, and remote Scottish islands we maintain and invest in the high voltage 132kV, 220kV, 275kV and 400kV electricity transmission network. Our network consists of underground and subsea cables, overhead lines on wooden poles and steel towers, and electricity substations, extending over a quarter of the UK's land mass crossing some of its most challenging terrain.

We power our communities by providing a safe and reliable supply of electricity. We do this by taking the electricity from generators and transporting it at high voltages over long distances through our transmission network for onward distribution to homes and businesses in villages, towns and cities.

**Location of proposed development:** Throughout Scotland.

Taking a *Certain View* of SSEN Transmission's strategic investments in our network area in the north of Scotland, as outlined in SSEN Transmission's business plan, [A Network for Net Zero](#), reinforcements to the East Coast transmission network and upgrades to Argyll and Skye's existing transmission infrastructure will play a crucial role in ensuring security of supply, whilst supporting the delivery of further renewable generation during the transition to net zero. **Further information on these projects can be found within our [Business Plan](#) on pages 42-47.**

In the long term, and as renewable generation policy progresses (particularly outcomes from future CfD auctions and expected offshore wind leasing rounds) clarity on requirements for further strategic investment in our network, in addition to the regional priority areas outlined above, will become more apparent. For example, we also continue to take forward proposals to progress links to Scotland's remote islands as well as future onshore and offshore connections. Whilst these investments are not yet certain, what is certain is there will be the need for significant additional renewable generation and the associated supporting network infrastructure to meet net zero targets.

To ensure that current uncertainties do not impact on future network needs we would ask that the projects highlighted in our *Certain View* will be referenced within the next planning framework as being significant to Scotland's decarbonisation and economic ambitions, alongside wider recognition that any required upgrades to the transmission network as a whole will be nationally significant.

**What part of the development requires planning consent:** Any new or upgraded substations, switching stations, onshore converter stations which are connected to the High Voltage Transmission Network (that being 132kV or above) requires planning consent. Planning consent is also required for access tracks, bridges, bellmouths as well as other development types that are required in connection with the development and maintenance of our network.

We have a range of Permitted Development Rights that we can draw upon in certain circumstances which remove the requirement for planning permission, particularly for some types of works to existing substations, for example.

Consent under Section 37 of the Electricity Act 1989 is required for certain types of overhead lines and associated infrastructure. These applications request a direction under Section 57 (2) of the Town and Country Planning (Scotland) Act 1997 that planning permission be deemed to be granted.

In some cases, depending on the nature of the proposals, we can utilise The Overhead Line (Exemption) (Scotland) Regulations 2013 which removes the requirement for an application under S37 of the Electricity Act 1989.

**When would the development be complete or operational:** Delivery and maintenance of infrastructure to support an efficient and robust transmission system in Scotland is ongoing and fluid, led by developer commitment, customer need and regulatory requirements. The key strategic projects referenced above are expected to be delivered during our next price control period from 2021-2026.

**Is the development already formally recognised?** At present, 13kV or above transmission infrastructure is recognised within NPF3 as being nationally significant development. We would advocate that this recognition continues in NPF4 to support the transition to net zero and ensure continued resilience of the network for the remote communities we serve.

The 132kV threshold is a helpful catch all which supports small and large scale projects which are all critical to the overall functioning of the network. We would like to see this retained in NPF4.

The timescales associated with processing a National town and country planning application are substantially different from that of a local application. A small scale extension to a high voltage substation can end up being classed as an “upgrade” of national development and therefore requires a minimum of 12 weeks pre-app consultation, statutory 4 month determination period and will likely, depending upon the scheme of delegation, be determined at full council or planning committee. Experience to date has been that the processing arrangements around full Council or special meetings of the planning committee can lead to delays in processing applications and it takes well beyond the statutory periods to get decisions.

Smaller scale applications that otherwise would have been ‘local’ applications (based on their site area) are processed as ‘national’. Much of this depends upon the planning authority’s scheme of delegation.

We have reviewed the current wording within Annex A of NPF 3 in relation to high voltage electricity network. Whilst we are supportive of the text as it stands but we have one suggestion. Under 4 2b. we suggest the text is reworded as follows:

*“new and/or upgraded onshore sub stations/**switching stations** directly linked to electricity transmission cabling of or in excess of 132 kilovolts.”*

#### **Contribution of proposed national development:**

##### Climate Change

We believe we have a key arterial role to play during the transition to net zero, providing the critical national infrastructure required to enable a net zero network and also as a facilitator for further low carbon investment in Scotland.

The north of Scotland and its islands has a significant renewable energy resource which should continue to be maximised to help deliver further modernisation and transformation in the electricity sector. As a facilitator for low carbon generation in Scotland, SSEN Transmission currently has over 6GW of renewable energy connected to our network, and we expect this figure to increase to at least 10GW

by 2026 based on current known factors (the certain view, as outlined in our RIIO-T2 business plan, [A Network for Net Zero](#)).

Coordination between all agencies will be critical for success during the delivery process to align on planning, policy, timescales and goals at a national level, taking a whole system approach to the low carbon opportunities presented.

### People

Through our Transmission business' [Sustainability Strategy](#), we aim to deliver our strategic objective to enable the transition to a net zero economy whilst also providing additional benefit to the communities in which we operate.

We aim to serve our communities by providing robust security of supply to the most rural and remote parts of Scotland. We recognise that in rural communities, connectivity and resilience is of paramount importance to ensuring positive outcomes for quality of life, health and wellbeing. To respond to this, our business plan commits to deliver 100% reliability for homes and businesses in rural Scotland.

### Inclusive growth

Further investment in the transmission network will play a vital role in the delivery of Scotland's net zero ambitions but would also create opportunities for growth in the economy for our local, regional and national supply chains, directly and indirectly. This creates benefits for local communities via increased network resilience but also creates benefit by investing in and working with rural economies, all while contributing to national level climate change targets and economic outcomes. Over the past six years our transmission business has invested over £1bn into infrastructure in the north of Scotland.

### Place

SSEN is supportive of measures within the planning process that improve, protect and strengthen the special character of our places in Scotland. In July 2019, our Transmission business became the first GB network licensee to consult on an approach to [implementing biodiversity net gain](#) in the development and construction of our projects. Promoting our natural environment encompasses many areas including (but not limited to) biodiversity, natural processes, landscape change and visual amenity.

Our ambition is to ensure that our activities not only maintain the existing balance that exists, but help to enhance the biodiversity in our area, targeting a net gain. As a responsible developer and as part of our wider sustainability ambitions, we endeavour to ensure that our developments have a minimal impact on the local communities and environments in which we operate and provide additional benefits where possible.

