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28th November 2006.

Dear Mr Mackenzie,

JOHN MUIR TRUST LIMITED
THE NATIONAL TRUST FOR SCOTLAND
THE RAMBLERS ASSOCIATION SCOTLAND
THE ASSOCIATION FOR THE PROTECTION OF RURAL SCOTLAND
SCOTTISH WILD LAND GROUP
THE MOUNTAINEERING COUNCIL OF SCOTLAND
Known as "The Beaully Denny Landscape Group"
BEAULY DENNY PUBIC INQUIRY

I now enclose my clients' Statement of Case, List of Witnesses and List of Documents.

I am asked to say that they wish to be referred to as the "The Beaully Denny Landscape Group" and not as the Link Group. The Link Group refers to a different group and use of their name would not be appropriate in the circumstances.

I am also asked to say that my clients and Highland Before Pylons remain separate parties to the enquiry. They will co-operate as much as possible in relation to giving of evidence as their interests are similar.

Yours sincerely,

Walter Semple

SCOTTISH EXECUTIVE INQUIRY REPORTERS

PUBLIC INQUIRY

PROPOSED BEAULY TO DENNY 400KV ELECTRICITY TRANSMISSION LINE

ELECTRICITY ACT 1989 SECTION 37

STATEMENT OF CASE

BY

JOHN MUIR TRUST LIMITED
THE NATIONAL TRUST FOR SCOTLAND
THE RAMBLERS ASSOCIATION SCOTLAND
THE ASSOCIATION FOR THE PROTECTION OF RURAL SCOTLAND
SCOTTISH WILD LAND GROUP
THE MOUNTAINEERING COUNCIL OF SCOTLAND

(“BEAULY DENNY LANDSCAPE GROUP” OR “BDLG”)

1. Preliminary

BDLG agree in principle with the need for adequate generation and supply of electricity, renewable electricity generation, carbon emission reduction, sustainable development, and protection of natural and environmental resources including landscape, habitats and wild life. However BDLG say that to allow the proposed Beaully Denny Transmission Line (“the Proposed Line”) would be a wrong way to proceed. The reasons for which they propose this view are the following:

- Adverse Impact on the Landscape caused by the Proposed Line.
- Adverse Impact on the Landscape in areas where additional generation capacity would be installed which is only made possible by the Proposed Line.
- Failure in the Environmental Statement to establish a need for the Proposed Line.
- Failure to address in the Environmental Statement the poor economic viability of wind turbines in Northern Scotland in the medium and long term future in relation to the nature and extent of consumer subsidy and likely consequences on required transmission capacity.
- Failure to address in the Environmental Statement reasonable alternatives to the Proposed Line including failure to explore a sub-sea cable solution.

BDLG intend to associate themselves with evidence given by others on Habitat and Wildlife issues, and also on evidence related to risks to human health on the precautionary principle. To avoid repetition they will not present evidence on these matters but will do so on Landscape issues.

2. Adverse Landscape Impact

The Importance of Scotland's Landscapes

Landscape is about the relationship between people and place. It is an expression used to define people's experience and perception of the combination of topography, water, vegetation cover and the cultural environment. Scotland's heritage of natural and cultural landscapes is renowned throughout the world. Landscapes enhance local people's and visitors' quality of life and well-being; they give inspiration, refreshment and enjoyment; they form a key part of national, regional and local identity. They provide the settings which are critical to people's decisions to stay in, relocate to or invest in Scotland. They are one of the main reasons why people visit Scotland, and so form the essential basis of its tourism industry. They are therefore of fundamental importance to Scotland's environment, society and economy.

Landscape Impacts

The proposed development would have significant adverse effects upon the character of a range of Scotland's cherished upland landscape types along the entire route. These include wild places, pastoral straths and glens, heather moorland and hills near the central belt valued for recreation. Some of these adverse impacts would be upon areas designated for their national or local landscape importance, but the entire development is of such a scale that its overall impact on both designated and undesignated landscapes would be unacceptable. The proposed development would significantly adversely affect both remote areas visited or viewed by people for whom they hold special qualities, and many places seen, visited, and travelled through by local people, other Scottish residents, and visitors to Scotland,

These landscapes are important, they have significant recreational value and both local people and visitors enjoy and value them. The proposed development would have unacceptably great adverse impacts on the values of these landscapes and on their enjoyment.

Legal and Administrative Framework

Electricity Act 1989 Schedule 9.3(1)

(1) In formulating any relevant proposals, a licence holder or a person authorised by an exemption to generate or supply electricity—

(a) shall have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and

(b) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

The Proposed Line would not pay sufficient regard to the desirability of preserving its natural beauty and conserving its physiographical features of special interest.

Countryside (Scotland) Act 1967

Section 66 of the Countryside (Scotland) Act 1967 states:

“In the exercise of their functions relating to land under any enactment every Minister, government department and public body shall have regard to the desirability of conserving the natural beauty and amenity of the countryside”. The proposed development would not conserve the natural beauty and amenity of the countryside.

National Planning Policy Guideline 14 (NPPG 14)

NPPG 14 contains clear commitments by the Scottish Executive to the protection and enhancement of Scotland’s landscapes, including statements in paragraphs 11, 15 and 47. The overall scale of the proposed development would inevitably have unacceptably great adverse impacts on the character of the landscape, and would therefore not be in accordance with Government policy as set out in NPPG 14.

European Landscape Convention

The UK Government ratified the Council of Europe’s European Landscape Convention (ELC) in November 2006. The ELC clearly sets out the wide-ranging importance of landscape in its Preamble. Each party to the ELC undertakes *“to recognise landscapes ... as an essential component of people’s surroundings, an expression of the diversity of their shared cultural and natural heritage, and a foundation of their identity”*. The Government’s ratification of the ELC is evidence of an evolving national commitment towards greater landscape protection, which the proposed development would contradict.

Wild Land

Wildness is one particular aspect of Scotland’s landscape which is strongly valued by many people at a national and international level. NPPG14 defines wild land in its Glossary and expresses its significance well in Paragraph 16. Thinking on wild land has developed over recent years, resulting for example in policy statements produced by Scottish Natural Heritage (SNH), The National Trust for Scotland (NTS), The Mountaineering Council of Scotland, and the John Muir Trust (JMT); these set out the significance of wild land, the threats to it and the actions required to protect it.

The route of the Proposed Line passes through many areas with strong qualities of wildness, and in particular through one of the main wild land areas identified by SNH on its map of “search areas for wild land”. The proposed development would have unacceptably adverse impacts upon wild land quality, in contravention of government policy and SNH’s advice.

The Environmental Statement

In the non technical summary at 5.3., the Applicants concede that the Proposed Line will result in visual intrusion which is difficult to reduce. Their only remedy is mitigation by careful routing. This is a wholly inadequate response to the overall environmental impact of the Proposed Line and the wind turbine developments which will rely on its transmission capacity

Images

The visual impact of the pylon line as represented by the Applicants is in material respects understated and that the choice of viewpoints is in some cases unrepresentative of the visual experience. BDLG will present examples of this and demonstrate more realistic and representative images.

Indirect and Secondary Effects:

The purpose of the Proposed Line is the transmission of electricity generated from wind turbines in the North of Scotland to the South where it would be consumed. The Environmental Statement at 3.4.2.2. refers to Renewables Generation Applications as at April 2004 with an overall total of 5887 MW of installed capacity. It may be that many of these will not be built. It may also be that other applications will be received.

An indication of what general impact this may have on the landscape may be gained by a comparison with the recently approved Whitelee wind farm application in Eaglesham Renfrewshire. This development involves 140 turbines generating 332MW power capacity. If this information is extrapolated to 5887 MW of power capacity in accordance with the Environmental Statement, the North of Scotland faces installation of 2482 turbines. The Royal Society of Edinburgh Summary Report (referred to in paragraph 3 below) at page 15 estimates that to achieve a 20% contribution to Scotland's electricity generation would require 1500 turbines covering a land area of around 600 square kilometres and a subsidy of around £35 million per year.

This would involve a major adverse and unprecedented intrusion into the landscape of the Highlands which has not been addressed in any way in the Environmental Statement. It may be said that this is a matter for planning consent and not for the present application. This would be correct in relation to any individual development. However the purpose of the Proposed Line is said to be to transmit wind generated electricity from renewables installations in the North of Scotland to the South. The installation of renewable capacity on this scale would rely on the Proposed Line. For this reason the Proposed Line would have a major adverse impact on landscape of the Highlands in the areas where the renewables generation would be installed as well as where the Proposed Line would be installed. For this reason the Environmental Statement lacks essential environmental information and is materially defective.

3. **Failure to establish a Need for the Proposed Line.**

A Strategy for Sustainable Development

In June 2006 The Royal Society of Edinburgh published a Report entitled “*Inquiry into Energy Issues for Scotland*”, and a Summary of that Report. Page 6 of the Summary Report advocates a strategy for sustainable development including a clear articulation of objectives for energy policy for Scotland. It proposed as a strategic aim “a secure, competitive, socially equitable and low carbon emissions supply of energy for Scotland”. It proposed four supporting objectives:

- (a) encourage energy efficiency to the benefit of economic development
- (b) ensure that energy availability contributes to improvements in social benefits to Scotland’s people
- (c) minimise adverse environmental effects both locally and globally, and
- (d) capitalise on the energy resources of Scotland in an economically viable and environmentally friendly way.

BDLG associates itself with these proposals. It further submits that when viewed from the perspective of these proposals, the Applicants have failed to establish a need for Proposed Line. The Applicants proposed line is neither environmentally friendly nor economically sustainable.

The Proposed Line lacks the support of a strategic review against the wider context of the proposed line and its associated generation capacity can be assessed. For example:

- The impact of the Proposed Line on Landscapes and Habitats affected by future installed generation capacity has not been considered.
- The special consequences of intermittent generation of electricity from wind have not been considered.
- Alternative uses for wind generated electricity in the North of Scotland have not been considered.
- The possibility of transmission by way of sub-sea cables has not been considered.

Without such a strategic review of the wider issues which the Proposed Line raises, the Applicants are not able to establish a need for the line taking into account the statutory and policy restraints which apply.

Issues to be addressed

Common Method of Assessment

There is no common methodology for assessing energy technologies. They should be assessed by reference to state of technology, infrastructure requirements, security of supply, carbon benefits, effects on water quality, use of waste product, costs to the consumer, effects on communities, and effects on natural heritage assets, as well as full lifetime costs and an audit of carbon effects.

The existence of a source of energy does not guarantee that it can be delivered economically to the market. The infrastructure implications are an essential consideration.

Intermittency of Wind Generation

Generation of electricity by wind is by nature intermittent. It has a low load or capacity factor. If it is not to prejudice the security of supply in an unacceptable way it needs strong support from conventional generation. A consequence of this relationship between conventional and wind turbine generation is that the national grid can only support a proportion of wind generation in relation to conventional generation without prejudicing the security of supply to consumers.

The expansion of wind generation capacity in South and Central Scotland and in England will become so large that it threatens to upset the balance of its relationship with conventional generation capacity. The effect of this is that the additional wind generation capacity proposed for the North of Scotland and to be transmitted by the Proposed Line is likely to destabilise the National Grid by the time such generation becomes available. The application for the Proposed Line is premature in light of these emerging fundamental technical challenges. In consequence the need for the Proposed Line has not been established.

Consumer Subsidy; Transmission Costs and Losses; The Economic Factor

There are important disadvantages associated with the overall economic rationale for large scale wind turbine installations in locations remote from the consumer. They rely financially on consumer subsidy. The nature of these subsidies should and is likely to change so as to recognise reduction of carbon emissions. They involve high transmission cost and also transmission losses.

Meeting Government Targets without the Need for Beaulieu Denny.

There is evidence of installation and planning of renewable generation capacity in South and Central Scotland which can reasonably be expected to meet government targets without recourse to generation by wind turbines in the North of Scotland. On 7th October 2005 SP Transmission made a submission to OFGEM to demonstrate justification for an Upgrade to the Scotland-England Interconnector. Central to the submission was the information provided showing that the Upgrade was justified without the Beaulieu Denny proposal. For example paragraph 2.4.5 states “There is therefore 4.4 GW of contracted generation that can connect in Scotland without Beaulieu Denny”. As this figure excludes Hydro capacity of say 1.3GW, the Scottish Executive target of say 6GW by 2020 will soon be met without recourse to the installed capacity which relies for transmission on the Beaulieu Denny Upgrade.

Environmental Cost

The cost of the Proposed Line includes not only the financial cost of construction and maintenance but also the environmental cost of intrusion into landscapes and habitats. The latter cannot be easily quantified in economic terms but is a real cost which must be taken into account and met.

Local industrial consumption of wind generated electricity

Electricity generated in the North of Scotland from wind turbines and other renewables can be used in processes such as low carbon manufacture of hydrogen. Manufacture of hydrogen from renewable energy is developing swiftly. Hydrogen consuming technologies are rapidly being developed and are now readily available.

Manufactured hydrogen provides off grid power to communities. It breaks remote community dependence on fossil hydrocarbons and ensures local grid stability. Further local value added business opportunities are emerging from the production of hydrogen.

In economically vulnerable communities the use of local renewable energy to meet local grid and off grid energy needs through hydrogen is a better use of local renewable energy than servicing distant markets while the host community continues to pay high power costs.

Examples of activity include:

- Unst has established a wind to hydrogen demonstration project
- The Western Isles Council has established a hydrogen development strategy.
- HIE are working with all their regions on a hydrogen initiative
- The Orkney Islands are working on Hydrogen pathways with a view to exploiting Flotta.
- The All Energy Conference in Aberdeen in May 2007 sees the first renewable Hydrogen conference in Europe organized by the Scottish Hydrogen and Fuel Cell Association.
- The IDIS (Independent Developing Island States) is developing and implementing “hydrogen from renewables” development plan.
- The UK is actively involved through a number of hydrogen and fuel cell implementation companies.
- Many more examples are emerging around the world.

BDLG submits that:

- 1) As a method of generating electricity wind turbines in locations in the North of Scotland remote from the consumer are unlikely to be either financially viable without the present consumer subsidy or sustainable in the long term.
- 2) There is good reason to believe that government targets will be met from wind generated electricity in parts of Scotland which do not require the Proposed Line for transmission.
- 3) There are other actual and future uses for electricity generated in the North of Scotland, and other ways in which the power can be transmitted to the South. These have not been considered.
- 4) Accordingly the need for the line has not been established.

4. Economic Assessment of the proposed Beauly to Denny Grid Reinforcement

OFGEM Assessment of Need for the Proposed Line

OFGEM is responsible for assessing the economic viability of proposed upgrading or extension of the national grid. The methodology it employs is set out in

“*Transmission Investment for Renewables Generation – final proposals*” (December 2004). The key elements in OFGEM’s analysis are:

- A forecast of the level of new generation
- A technical evaluation of the energy likely to be constrained off the system if the project is not carried out
- An estimate of the compensation payments associated with constrained-off energy and savings due to the reduction in transmission losses.
- Comparison of the discounted value of these payments and savings with the capital cost of the project.

Much of the work for OFGEM was carried out by consultants Sinclair Knight Merz (“SKM”), whose draft proposals were circulated in August 2004 (*Technical Evaluation of Transmission Network Reinforcement Expenditure Proposals by Licensees in Great Britain – Draft Report*, Sinclair Knight Merz, August 2004). After consultation by OFGEM, these draft proposals were amended and revised figures were contained in OFGEM’s final proposals. OFGEM concluded that the Beaully-Denny project became cost effective with around 1.2 GW of wind generation north of Beaully and included the project as baseline investment. SKM’s central estimate of the likely level of onshore wind generation north of Beaully was 1.5 GW. Circumstances have changed in the intervening two years.

Estimate of likely future level of renewables generation

A fair estimate of the likely level of new generation in the Highland Council region can now be made as follows:

Operational under construction and approved:	approximately 380MW
Submitted and not yet determined or under appeal: say 880 MW	
discounted by say 65% (to reflect current experience)	approximately 310MW
Scoping opinion: say 1146MW discounts by 65%	approximately <u>400MW</u>
Total	approximately 1090MW

This is less than the 1200MW threshold stated by OFGEM in 2004.

Highland Council’s strategic objectives for onshore wind power (excluding community turbines) in 2015 and 2020 are 1200 MW and 1400 MW respectively (*Highland Renewable Energy Strategy and Planning Guidelines. The Highland Council, May 2006*). These figures fall far short of SKM’s central estimate for generation north of Beaully.

Subsidy in Future

Wind turbines in the North of Scotland are not self financing without subsidy. The financial viability of new wind turbines depends on subsidies known as ROCs. On present policies, this system is to be continued until 2027. Two factors have now become important which were not taken into account by OFGEM.

(a) Wind turbines have an expected life of 15 to 20 years. In the absence of the prospect of future ROCs when the turbines need to be replaced economic conditions are unlikely to warrant replacement. The proposed Beaully Denny line would have an

expected life of about 40 years. That is more than twice the expected life of wind turbines. Thus it can be fairly estimated that the need for the proposed Beaully Denny line will reduce rather than increase.

(b) The ROCs system is currently under review. In 2005 the DTI/NAO report on Renewable energy [DTI/NAO *Renewable Energy* HC 210, Session 2005-2005] noted that the level of ROCs was excessive for onshore wind farms. The Government's proposal (out for consultation) is now to extend the Obligation after 2015/16 (when it is set at 15.4%), but to increase it thereafter only when justified by actual generation levels. It would limit it to 20%, to ensure that the gap between the Obligation and the renewable energy generated does not become large. Thus it would limit the extent to which the value of ROCs can exceed the buyout price. The buyout price is also to be frozen from 2015, thus ensuring that it remains (in real terms) at the same level (£30/MWh) as that assumed for the SKM and OFGEM reports.

The result is that the value of ROCs is likely to decline from the £40/MWh (in real terms) assumed in the OFGEM report to about £30/MWh by 2020, and to decline further to around £7 (the social cost of carbon) thereafter by the end of the ROCs scheme in 2027. This compares with the £40-45/MWh (including an element for the Climate Change Levy) assumed in the OFGEM report. This range appears to be on average about £5 too high in the period up to 2020 and perhaps £15 too high on average thereafter to 2027.

The Government has proposed "banding" ROCs. This is also likely to result in a substantial reduction in ROC income for new wind farms. The Government has not indicated the values it has in mind to attach to each band, but in view of the 1/3 figure noted in the DTI/NAO report it seems unlikely that new onshore wind farms will be given a weight of more than 0.75, i.e. a 25% reduction on the existing position. Since the Beaully-Denny link cannot now be completed before 2010 the effect of these proposals is to reduce the level of ROC income earned by all onshore wind farms coming on stream after that date i.e. realistically in Highland Region, all those that have not yet submitted planning applications. Over half of the capacity of the actual and possible wind farms notified to Highland Council comes in this category. Wind farms that are in operation in 2010 will continue to receive ROCs at the current level. Since SHETL will have a financial incentive to constrain off those generators that will be eligible for the lowest compensation, banding is likely to reduce the cost of compensating wind generators in respect of constrained off ROCs by 15-20%.

If changes of this nature come into effect, they will inhibit the development of new wind generating capacity in the North of Scotland: decisions to develop and install will be made more on the basis of the underlying market demand for intermittent energy with less reliance being placed on government subsidy.

The Foyers Effect.

Wind generated electricity can be used in support of pumped storage hydro systems by driving the pumps using locally generated electricity at times of peak supply without using the grid. This mitigates the constraints on the grid by reducing demand

for transmission. As yet there is not consensus on the extent of the mitigation in view of the availability of thermally generated electricity during periods of low demand. OFGEM has allowed a mitigation factor of 100MW. If pumps are powered by wind generated electricity which would otherwise not be used, the mitigation factor could be much higher. According to the SKM Report referred to it could be as much as 700MW with 1400 MW of wind generation capacity, though less at higher capacity levels. The example relates to Foyers pumped storage power station.

Evaluation of Constraint Costs.

In arriving at their recommendation of 1.2 GW of capacity as the level at which the Proposed Line would be justified, SKM and OFGEM needed to estimate the costs to the grid operator of constraining wind turbine capacity off the grid. OFGEM worked with figures of £65/£75 per MWh until 2027. On a full economic evaluation there is good reason to consider that the OFGEM figure may be too high.

Conclusion.

The combined effect of these factors is to raise the wind farm capacity level at which the Beauly-Denny reinforcement becomes cost-effective in OFGEM's terms to about 1.5 GW, or possibly to as much as 2 GW if SKM's earlier figures on the use of Foyers carry weight.

In deciding whether, in its own terms, OFGEM's economic case for the reinforcement has been made, it is necessary to compare these figures with a realistic assessment of the probable level of wind farm development north of Beauly for which planning permission will be granted. The 1.5 GW level appears to be above Highland Council's strategic target for 2020 for the whole Highland Council region. Moreover, to reach the 1.5 GW level from the existing proposals ("submitted, but not yet determined", "scoping opinion", and "appeal") presently under consideration by Highland Council, requires that more than 50% of the capacity involved will eventually be constructed.

OFGEM's analysis is not a full cost benefit analysis. The economic benefit from wind farms is the cost of the fuel (in practice coal or gas) that does not have to be burned, the benefit from the associated reduction in carbon and other emissions, and a capital cost allowance in respect of about 20% of the rated capacity of the wind farms. That benefit falls far short of the £65-75/MWh that OFGEM has employed in its analysis.

The economic case for the Proposed Line has not been made. Serious doubts exist as to whether significant amounts of the generation capacity which is required for the Proposed Line will ever be built. Even if the Proposed Line were built it is also doubtful if the generation capacity built initially will be renewed. For these reasons the need for the Proposed Line has not been established in economic terms.

5. Failure to explore Reasonable Alternatives for the Proposed Transmission Line.

BDLG Group submit that the need for the line has not been established. Its economic justification will not prove to be sound and it should not be built. However if the decision is taken that the transmission capacity needs to be reinforced contrary to the evidence produced by BDLG Group, the Group's position is that the reinforcement to the transmission capacity should not take place by way of the Proposed Line. There is an increasing recognition of the role of subsea cables in the transmission of electricity.

The possibility of transmission by way of subsea cable by way of a route along the East coast of Scotland has been raised by the Highlands Before Pylons Group. BDLG associates itself with the position taken on this issue by Highlands Before Pylons Group.

It would offer the additional advantage of possible removal of the need for existing line.

BDLG further submits that if the Scottish Executive were minded to provide for reinforcement of existing transmission capacity, consent should not be given to the Proposed Line before the Applicants present a properly assessed and costed proposal for a solution by way of subsea cable. Failure to do this represents a material omission from the environmental statement.

Such a solution would encounter few if any of the fundamental environmental objections which have resulted from the present application. The associated costs such as the difficulty of obtaining consent under section 37 would be much reduced, and the time taken to completion would be much less.

6. Local economic benefits and disbenefits

As well as Government policies in respect of energy and the environment, policies for national and regional economic development have a bearing on this proposal. BLDG support the principles of securing economic benefits to Scotland and especially its remoter areas from investment in renewable energy, and of sustainable local economic development. BLDG submit that a proper evaluation of the full range of economic benefits and disbenefits of the proposal would be likely to indicate:

- 6.1. longer-term employment in energy transmission and generation, and manufacturing of renewable energy plant
- 6.2. financial benefits to landowners
- 6.3. negotiated benefits to local communities
- 6.4. diminished visitor/recreational spending and general investment due to landscape detriment.

However these would be at least matched if not outweighed by economic benefits of alternative arrangements including

- 6.5. sustainable employment in renewable energy schemes meeting local requirements


- 6.6. employment in energy plant, generation, and transmission in offshore wind and marine hydro with lower-transmission-loss sub-sea cables to major centres of consumption
- 6.7. benefits to all local communities from lower costs of locally-generated and where practicable locally-managed energy, and related investment in domestic energy efficiency and reducing energy poverty
- 6.8. increased spending and general investment in the Highlands and in Scotland generally due to high quality environment and justified reputation as ‘best small country in Europe’.

7. Conclusion and Submission

- 7.1. The Proposed Line will cause visual intrusion on landscape which is not acceptable in terms of government policy.
- 7.2. The Applicants concede that the Proposed Line will cause visual intrusion. They have sought to show how they will mitigate it by careful routing. This is a wholly inadequate response to the overall impact of the Proposed Line.
- 7.3. The Proposed Line will rely for its justification on the installation of very large numbers of wind turbines in environmentally sensitive areas. The environmental effect of this is not considered in the Environmental Statement. This omission is a material failure rendering the Environmental Statement subject to legal challenge.
- 7.4. Targets in Government policies can be expected to be met from installed renewables generation capacity without recourse to Northern Scotland and accordingly there is no need for the Proposed Line.
- 7.5. Future economic viability of wind farm electricity generation in Northern Scotland for transmission to remote consumers is unsound and is likely to lead to abandonment of installed generation capacity in the medium and long term. Accordingly the need for the Proposed Line has not been established
- 7.6. In view of the amount of wind generated capacity now installed and planned in the Central and South Scotland and in England, there is a significant emerging risk that for reasons of intermittency new capacity from the North of Scotland could destabilise the national grid. For this reason the need for the line has not been established.
- 7.7. Transmission methods should be explored which avoid the environmental damage and cost and delay of the present proposal. An example is a subsea cable solution. Without such examination the need for the Proposed Line is not established
- 7.8. Alternative ways of using installed renewables generation capacity in Northern Scotland should be explored so as to avoid the need for grid transmission. Without such examination the need for the Proposed Line is not established
- 7.9. The economic benefits for Scotland and its local economies of alternative investment in renewable energy will at least match if not outweigh the economic benefits of the Proposed Line

7.10. For these reasons consent for the Application under Electricity Act 1989 section 37 should be refused.

For BEAULY DENNY LANDSCAPE GROUP,



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LIST OF WITNESSES:

- 1) Professor Roger Crofts
- 2) Professor Andrew Bain
- 3) John Mayhew
- 4) Helen McDade
- 5) David Jarman
- 6) Paul Driver
- 7) Derek Birkett
- 8) David McGrath
- 9) Stuart Young

SCOTTISH EXECUTIVE ENQUIRY REPORTERS

PUBLIC INQUIRY

PROPOSED BEAULY TO DENNY 400KV ELECTRICITY TRANSMISSION LINE

ELECTRICITY ACT 1989 SECTION 37

LIST OF DOCUMENTS

for

JOHN MUIR TRUST LIMITED
THE NATIONAL TRUST FOR SCOTLAND
THE RAMBLERS ASSOCIATION SCOTLAND
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SCOTTISH WILD LAND GROUP
THE MOUNTAINEERING COUNCIL OF SCOTLAND

(“BEAULY DENNY LANDSCAPE GROUP” OR “BDLG”)

- 1) Electricity Act 1989 Schedule 9.
- 2) Countryside (Scotland) Act 1967
- 3) European Landscape Convention
http://www.coe.int/T/E/Cultural_Co-operation/Environment/Landscape
- 4) National Planning Policy Guideline 14
<http://www.scotland.gov.uk/Publications/1999/01/nppg14>
- 5) Wildness in Scotland’s Countryside
<http://www.snh.org.uk/pdfs/polstat/pd-wsc.pdf>
- 6) SNH Landscape Policy Framework
- 7) National Trust for Scotland Landscape Policy
http://www.nts.org.uk/web/FILES/wild_land_policy_2002.pdf
- 8) John Muir Trust Wild Land Policy and Policy on Renewable Energy Developments
<http://www.jmt.org/policy-wild-land.asp>
- 9) The Mountaineering Council for Scotland Development in Mountain Areas Policy.
- 10) Scottish Executive Paper: *Securing a Renewable Future: Scotland’s Renewable Energy published in March 2003*
- 11) Scottish Executive Paper: *Securing a Renewable Future: Scotland’s Renewable Energy Potential: Realising the 2020 Target published in 2005*
- 12) The Royal Society of Edinburgh Report “*Inquiry into Energy Issues for Scotland*” published in June 2006: Summary Report.

- 13) The Royal Society of Edinburgh Report "*Inquiry into Energy Issues for Scotland*" published in June 2006: Full Report.
- 14) SPICe briefing The Electricity Network in Scotland 2004;
- 15) National Grid Company plc Seven Year Statement;
- 16) Professor Jim MacDonald The UK Energy Scene: Future Electrical Systems Challenges and Technologies October 2005;
- 17) Supergen Electricity Network Scenarios, 2005, Universities of Strathclyde, Cambridge and Imperial College London;
- 18) Illustrative transmission Charges for Scottish Islands, National Grid Transco 2005.
- 19) OFGEM Document: Transmission Investment for Renewables Generation – final proposals" (December 2004).
- 20) Technical Evaluation of Transmission Network Reinforcement Expenditure Proposals by Licensees in Great Britain, Draft Report, Sinclair Knight Merz, August 2004).
- 21) DTI/NAO report on Renewable Energy [DTI/NAO Renewable Energy HC 210, Session 2005-2005]
- 22) Highland Renewable Energy Strategy and Planning Guidelines, The Highland Council, May 2006)
- 23) OFGEM Document: Transmission Investment for Renewables Generation – SPTL Submission to Upgrade the Scotland /England Connector 31 October 2005
- 24) OFGEM Annual Reports for 2002-03, 2003-04 and 2004-05.
- 25) E-On Netz Wind reports for 2003, 2004 & 2005.
- 26) House of Lords: Practicalities of Renewable Energy - July 2004.
- 27) Subsidies and Subterfuge (Hydro-power and the Renewables Obligation) – Paper published by Scottish Wind Assessment Project. June 2005
- 28) Matching Renewable Electricity Generation with Demand – University of Edinburgh. February 2006.
- 29) The Costs and Impacts of Intermittency – UKERC Report, Imperial College, London. March 2006.
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