Skye Reinforcement Project

John Muir Trust online feedback survey response

23 April 2020

1. Have we adequately explained the changes in respect of the need for this Project?

yes

2. Have we adequately explained the reasons why the capacity of the line has to increase which will result in changes to the existing infrastructure along its route?

yes

3. Have we adequately explained the methodology used to re-appraise the preferred route for the new OHL design?

yes

4. Are there any factors, or environmental features, that you consider may have been overlooked during the route appraisal process?

The route appraisal has considered, through its Environmental Appraisal of Route options, wild land and wildness qualities as features of Scotland's landscapes and refers to the Wild Land Areas and the descriptions attributed to qualities of wildness by Scottish Natural Heritage. We welcome these considerations as well as the consideration given to National Scenic Areas.

We understand that mitigation measures along the route will be considered in the next stage. If this project is to reduce its impacts on peoples' experiences of wildness and on the ability of the land to support fully functioning eco-systems, then careful consideration and successful implementation of these measures will be really important. Sensitive approaches to constructing and later restoring temporary tracks, to undergrounding the line in short sections, to screening and to habitat restoration should be considered for each section of the preferred route.

The options appraisal recognises that Section 2 traverses a dramatic and sensitive landscape and that '*the larger replacement steel structures would make the new OHL a more prominent feature which could reduce the perceived wild land values of the WLA and could adversely affect the special qualities of the NSA.*' There is no doubt that upgrading this section from the existing wooden pole to the proposed single or double steel lattice overhead line will make a significant visual difference to the landscape and we are therefore concerned at this proposed change.

We support the statement that '*further detailed environmental and engineering survey work will be required to find an acceptable alignment and design solution through this sensitive landscape and environment*.' In addition to landscape impacts, additional surveys must also consider ecological impacts to the Cuillin SSSI and the Sligachan peatlands. As owner of the Sconser Estate, we have a particular interest in the impacts of this section and the John Muir Trust can provide local knowledge on the wild qualities and features of the land to reduce impacts through design, alignment and mitigation for this section.

The options appraisal recognises that environmental impacts are also less determined for the preferred route for Section 3: '*further detailed environmental and engineering survey work will be required to find an acceptable alignment and design solution through this sensitive landscape and environment, which could result in a review of the preferred route option*.' We suggest that specialist support from SNH will be important in the further detailed environmental survey work that is needed for this option and the potential impacts on wildness.

At page 16 the options appraisal outlines an approach for tracks that includes using existing tracks '*to install the majority of the towers'*, restoring all temporary tracks on completion of works and creating new permanent access tracks only when required. The appraisal further states, '*Preference will be given to lower impact access solutions including the use of low pressure tracked personnel vehicles and Trackway in boggy / soft ground areas to reduce any damage to, and compaction of, the ground. The use of these accesses would be kept to a minimum to minimise disruption to habitats along the route*.' We very much support this approach to tracks and the use of machinery as one that will minimise harm to the wild qualities of the land during construction and after.

We recognise there are practical challenges associated with taking this approach (for example, inclement weather that can undo or set restoration works back in time and the pressure of project timeframes to complete restoration works in full). We would therefore welcome a plan from SSEN Transmission that identifies factors that might stand in the way of successfully applying this approach and how it will overcome these.

The impacts of temporary or permanent tracks as well as holding sites diminish the strength of feeling of being in a remote, wild and rugged landscape for hillwalkers, visitors, people travelling through these landscapes and people who live in and around these landscapes. As such we suggest these impacts could have been considered as part of considering impacts of a route option from the perspective of recreational land use or on landscape and visual amenity within the table in Appendix 4.

5. Do you have any other comments in relation to the drivers for the project, related to the transmission infrastructure requirements, or preferred route?

We support the preferred route option for the upgraded line to follow the existing route along Section 2. We understand that this means the route would go around the base of the Cuillin Hills National Scenic Area and would be outside the Cuillins Wild Land Area. We expect a route that follows the existing line to cause less harm to wild land and natural environment as existing tracks can be used, upgrade and decommissioning activity will be across one site, thereby concentrating disruption in one area and reducing the need for new tracks or other infrastructure, and because the existing line runs along relatively rocky land so there are fewer anticipated peat impacts, and, for visual amenity, the line won't be at risk of being sky-lined as it will have the Cuillin Hills behind and people are used to seeing a transmission line along that route.

We are concerned that the proposed upgrade along Section 2 (as along other sections) from a wooden pole Overhead Line to a single (or double) circuit steel structure will result in a significant physical intrusion into the landscape and affect the ability of people on Skye, as well as those who visit, to experience its wild qualities. We recognise that the case for need has articulated why the steel structures are needed but this does not detract from the careful attention required at the next stage on these impacts and the need to make visual impressions available for people on Skye, as well as to the general public, so that people can have a better idea of the scale of the change.

We recognise the project's public interest aspects in security of energy supply for people on Skye and the Western Isles as well as enabling more renewable energy capacity to be transmitted in the future, but believe its scale merits consideration first of how and to what extent the sensitive and wild landscapes it will traverse can accommodate the steel structures and secondly what this development can do to enhance the wild scenic qualities of the landscapes it will traverse. Given its scale, we think it would be appropriate to consider screening and enhancement of landscape at the design stage as well as subsequent stages.

We would like to take this opportunity to ask SSEN Transmission what plans it has for screening the overhead lines along sections of the route where visual impacts are greatest, given the landscape designations and classifications and that the Holford Rules advocate mitigation of the visual impact of overhead lines using screening. This project, could, for example, support or undertake native woodland planting along its sections through sensitive landscapes. Native woodland would enhance the overall visual landscape quality, soften the stand-out aspect of the steel structures and draw a person's eye from the steel structures to the landscape's natural features.

Sensitive tree planting could be appropriate mitigation for Section 2, where the preferred option for the line runs near the Cuillin Hills National Scenic Areas and Cuillins Wild Land Area; for Section 3, where the preferred options for 3A and 3B raise concerns for the Kinloch and Kyleakin Hills Special Area of Conservation and

SSSI as well as Glen Arroch and Kylerhea Glen; and, for Section 4, where the preferred option raises concerns for Knoydart National Scenic Area, Kinlochourn–Knoydart–Morar Wild Land Area and the Central Highlands Wild Land Area.

Appendix 4 notes that for the preferred option for Section 4 '*It is likely that there would be a requirement to remove some native woodland to accommodate the new OHL*.' Loss of valuable woodland habitats should be avoided wherever possible but where woodland has to be removed to make way for the line then there should be a commitment from SSEN Transmission for new native woodland planting and this should be factored into the design plans before construction commences so there is time and budget to enable this to take place as part of the overall project.

In the consultation documents we note that local mitigation is possible by undergrounding lines for short sections of the route and that this will be considered in the next stage. To echo the points made above for Section 2, the preferred option for Section 4 of the line also raises concerns due to the impact a new double circuit steel overhead line will have on the remote, rugged and wild qualities of landscape in the Kinlochourn–Knoydart–Morar Wild Land Area, Central Highlands Wild Land Area and Knoydart National Scenic Area. We ask that SSEN Transmission look carefully at where the line could go underground (understanding that there are ecological impacts to be weighed up) for short stretches of this section, as well as potentially consider short sections for Section 2, in order to mitigate impacts on quality of landscape along the preferred routes for Sections 2 and 4.

For all sections of the transmission line, we would welcome assurance from SSEN Transmission that all temporary tracks created for the purposes of the Skye Reinforcement Project are removed and the land fully restored after they have served their time-limited purpose. Whilst we recognise that weather conditions and timeframes for work completion can impact on the quality of restoration, proper restoration is vital to visual amenity and the ability of people who live in and visit Scotland's wild land to experience qualities of ruggedness and remoteness. We expect the perceived wild qualities of remoteness, awe and wonder of land that the line crosses to be diminished by the upgrades. This makes the quality of restoration all the more important in enabling people to still experience some of these wild qualities when out in the hills or from a distance.