



Mr Rob Whytock,
Community Liaison Manager,
SSEN Transmission,
200 Dunkeld Road,
Perth,
PH1 3GH

1st April 2024

Dear Mr Whytock,

New Deer 2 Substation and Blackhillock – New Deer – Peterhead 400kV Consultation

I am writing to express concern with the method and resulting output of your consultations on the locations for the New Deer Substation (node 4) and the associated 400 kV Overhead line, Sections 10 and 11 of the Blackhillock to Peterhead 400 kV overhead lines.

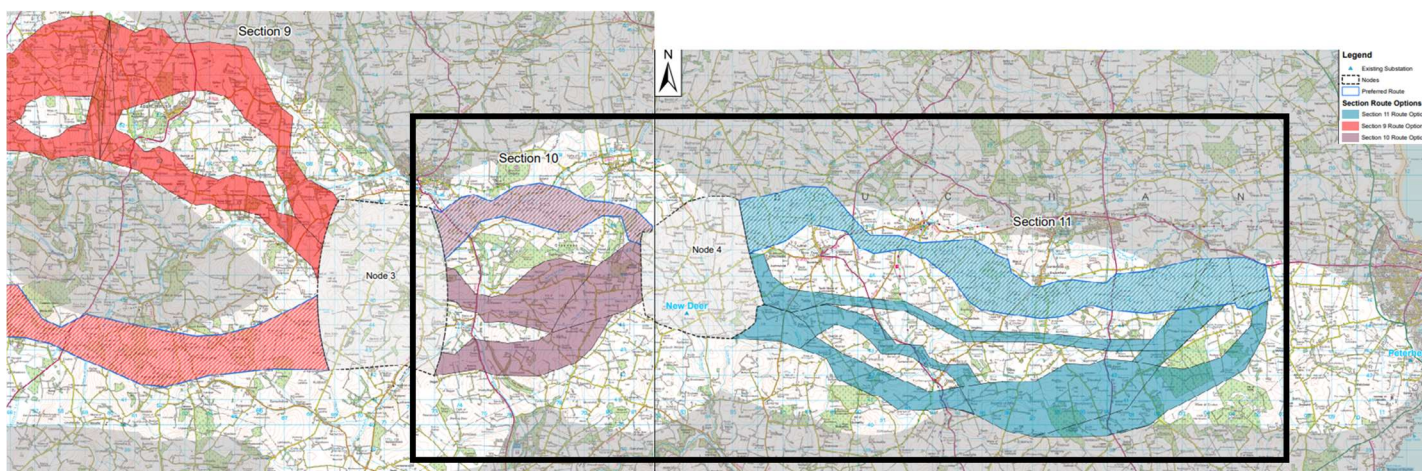


Figure 1: This letter relates to Sections 10, 11 and Node 4.

The Impact

The people of Central Buchan and Turriff feel ignored and taken for granted.

The proposed site for the New Deer substation has resulted in all but the most northerly potential routes for overhead lines being removed from consideration. This places the path of the pylons at the closest possible route to the Central Buchan villages and Turriff.

With pylons taller than the Scott Monument now planned to weave between their villages, residents of Stuartfield, Maud, New Deer and Turriff can't help but feel that they are being asked to pay for the central belt to have cheap electricity.

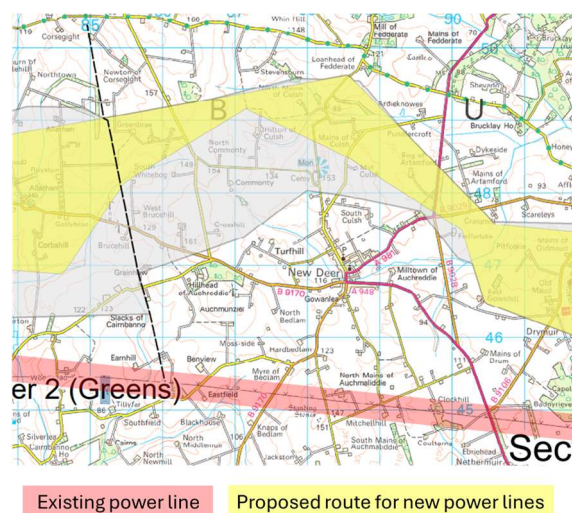


Figure 2: Impact on New Deer

In New Deer the proposals mean that the village will become almost entirely surrounded by pylons. The widening of the route for Section 10 does nothing to mitigate this reality.

4 key issues

There are 4 key issues with the consultation and its outputs:

1. Drip feeding information by breaking the project up into separate consultations for the New Deer substation and the Overhead line sections 10 and 11.
2. The elimination of New Deer substation locations south of the existing pylons.
3. The requirement to remain within 5km of existing substations.
4. The requirement for a New Deer substation

1. *Drip feeding information*

Although large projects need to be broken up into manageable sections, it cannot be forgotten that they are part of a whole. You would not build the new New Deer Substation (node 4) without also building the overhead line, and vice versa.

Why then did the consultation on the location of the New Deer Substation focus only on the technical and environmental considerations of the substation itself, and not include reasonable consideration of the community impact from the resulting overhead line routing?

This is fuelling a feeling in the community that information is being “drip fed” to prevent them from being able to understand big picture until it is too late. For instance, is there an expectation that further power lines will be connected to the New Deer substation in the future? How many? Where? When? No effort has been made to include the impact of these connections within the consultation, despite them being the stated requirement for a new Substation.

2. *The elimination of New Deer substation locations south of the existing pylons*

At the Huntly consultation in February 2024, it was relayed to me that sites south of the existing New Deer substation were reviewed but not included in the public consultation. This is most disappointing. Indeed, the original route options 11B, 11C1, 11C2, 11C3 and 11C4 all take a southerly route, indicating that locations in the south were considered.

A southerly location for the substation would allow for the overhead lines to run in the large area of countryside south of the existing powerlines, preventing the need for them to be routed close to the Central Buchan villages and Turriff.

True, it would make connection to (potential) generation sites in the north slightly more expensive (due to the need to cross the existing power lines), but this needs to be balanced against the reduced impact on north east residents.

The omission of these options from the consultation leads to the image that cost has been prioritised over community and that convenience has been prioritised over consultation.

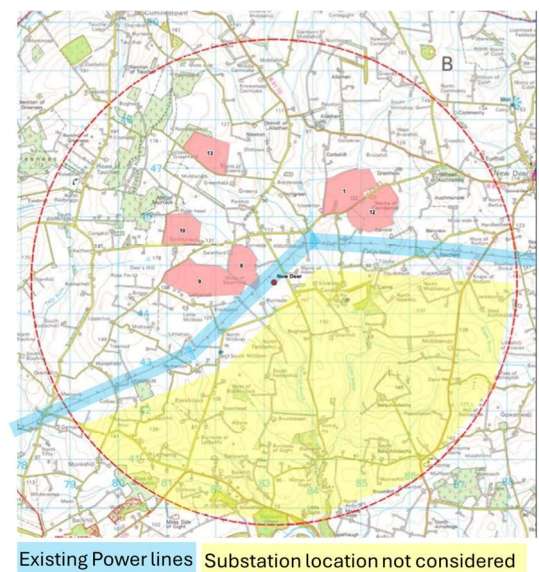


Figure 3: Alternative locations for the New Deer substation south of the existing substation.

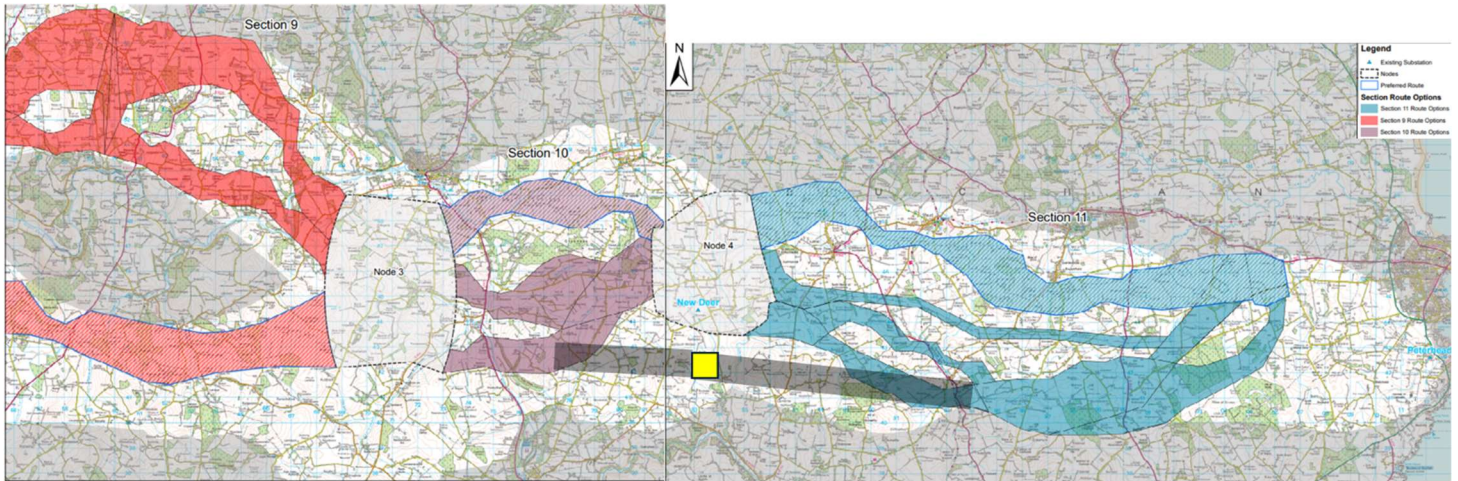


Figure 4: Locating the New Deer substation south (yellow box) of the existing substation would allow for the southern routes to be used for the overhead lines (black lines), thereby increasing the distance from the Central Buchan villages and Turriff. Locations illustrative only.

3. Decision to remain within 5km of existing substations.

The decision to remain within 5km of the existing substations has ultimately let to the new power lines being proposed along a similar route to the old lines.

The reason quoted for keeping the new substation within 5 km of existing ones is to minimise the length of connections required. However, where the specified intent of the substation is to allow for connection of generation capacity from offshore wind, it is clear that overhead cables will be required to run into the New Deer substation from the north.

Were the existing and new substations separated by a larger distance (by overhead lines), the new Overhead Lines section 10 and 11 could run further north, both getting them closer to the generation sites and preventing the need for them to run through the busiest part of Central Buchan.

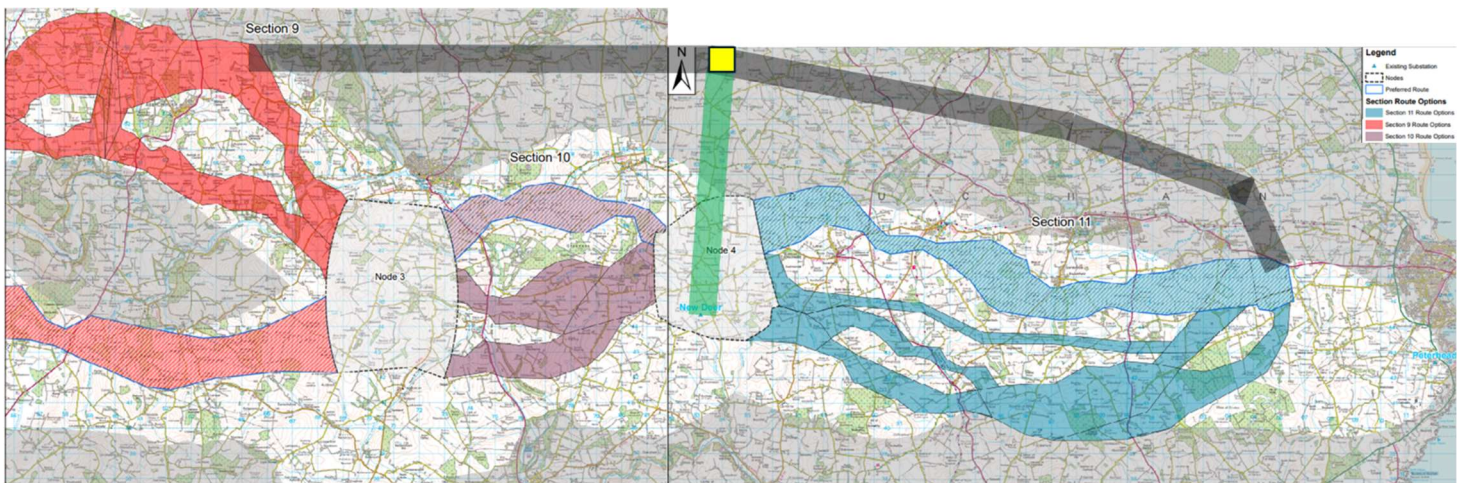


Figure 5: Alternative northern route (illustrative only) for the Overhead lines (black) with the new New Deer Substation (yellow box) located more than 5km from the existing substation, connected to the existing substation with an overhead or underground line (green)

4. The need for New Deer Substation

Although connecting the new Overhead Powerline to all the existing Substations makes, on paper, a better technical solution, is it actually needed?

It is clear from your Pathway to 2023 graphics that the distance between Peterhead and New Deer and Blackhillock and New Deer are far shorter than the distances between most substations along Scotland's coast.

If the requirement for a substation in New Deer was removed, the distance between Peterhead and Blackhillock would be similar to Peterhead to Fiddes and Fiddes to Tealing. If these distances are acceptable in other areas, why not between Peterhead and Blackhillock? Removing the requirement for a substation at New Deer would allow far greater freedom in selection of the overhead line route away from the Central Buchan villages and Turriff.

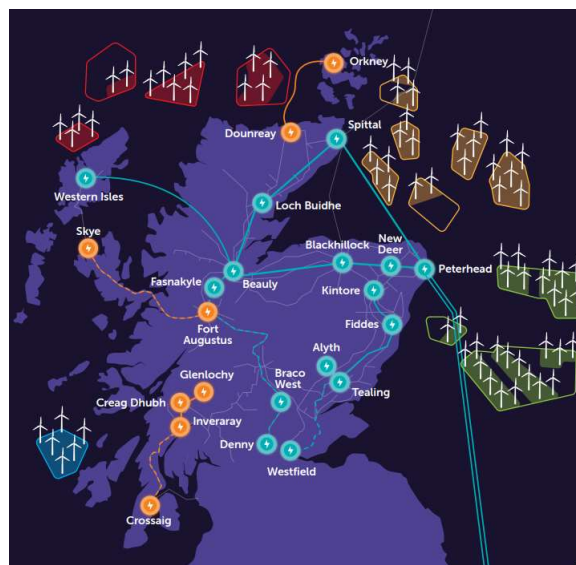


Figure 6: Substation sites in Scotland showing that the distance between Blackhill and Peterhead is similar to that between Peterhead and Fiddes and between Fiddes and Tealing.

Next steps

1. Please complete, publish and consult on the relative advantages/ disadvantages of following options:
 - a. Your current combined design for Section 10, Section 11 and Node 4 (i.e. site 13 for the New Deer substation).
 - b. An alternative design for Section 10, Section 11 and Node 4, where the New Deer substation is south of the existing overhead lines.
 - c. An alternative design for Section 10, Section 11 and Node 4, where the New Deer substation is located greater than 5km north of the existing substation.
2. Please provide details on the engineering justification / need for a substation in New Deer, given the close proximity to Blackhillock and Peterhead Substations.
3. Please advise why the routes for probable connections / approaches to the New Deer Substation are not part of the consultation, given they are the stated purpose of the substation in the first place.
4. Please refrain from making any submission for planning consent on Section 10, Section 11 or the New Deer Substation until the above are completed.

Yours sincerely,

Conrad Wood

Scottish Liberal Democrats candidate for Gordon and Buchan