

## Net Zero, Energy and Transport Committee

### *SSEN Transmission's additional evidence on NPF4*

#### About SSEN Transmission:

- [SSEN Transmission](#) owns, operates and develops the high voltage electricity transmission system in the north of Scotland and remote islands.
- As a regulated business, delivering critical national infrastructure, our job is to connect the renewable energy needed to support UK and Scotland's emissions reduction targets, delivering a network for net zero.
- Our developments and business strategy follow a stakeholder-led approach to deliver jobs and economic benefits, support greater resilience, create community wealth and improve our natural spaces. We contributed **£370m** to the Scottish economy in 2020/21.
- We're the first network company to commit to an externally accredited [science-based target](#) to reduce our own operational emissions as a business, and the first to consult and implement a sector leading [Biodiversity Net Gain strategy](#).

#### Planning that enables Net Zero:

- **Our network area in the north of Scotland, in particular, will play an outsized role in meeting the UK and Scotland's renewable energy targets, [contributing up to 10% of the UK Net Zero target](#)** – to enable this we're progressing strategic investments in our grid network to connect ScotWind and Scotland's remote islands, increase network capacity in Skye, Argyll, the North East and the Highlands, and boost rural resilience. *The scale of investment required is demonstrated in this animation of our network area [here](#).*
- **Through the current Transmission price control, RIIO-T2, we're planning to invest at least £2.8bn between now and 2026, potentially increasing to over £4bn, to deliver a network for net zero in the north of Scotland.** To deliver this we'll need to almost double our workforce between now and 2026.
- **However, delivery timescales are challenging and the levels of investment required to support net zero will be unprecedented.** Significant investment is needed in Scotland's grid infrastructure between now and 2030 (and beyond) to deliver renewable energy targets at scale and pace for net zero; delivering greater electrification in society to decarbonise heat and transport.
- **The planning process will play a key role in unlocking timely delivery of Scotland's low carbon future.** NPF4 will therefore need to lay the groundwork for a clear, responsive, flexible and well-resourced consenting process to enable timely delivery of low carbon infrastructure at the pace and scale to meet net zero.

#### Our key asks for NPF4:

- **We welcome the inclusion of renewable energy and transmission infrastructure as National Developments which helps to strengthen their role in tackling the climate emergency.** *We also support the overarching objectives of the plan which aims to tackle the twin climate and biodiversity emergencies, whilst also supporting a just transition to net zero.*

- **Successful delivery of NPF4's net zero objective will be dependent on a supportive planning process that is responsive to the levels of investment required to achieve Scotland's climate goals - having adequate levels of planning skills resource will be key to unlocking this.**  
*Increasing fees on its own won't support better quality and timely decision making without further investment in resource and skills planning (and the ring fencing of fees) to directly improve planning determination outcomes.*
- **The rewording of several policies within the current NPF4 draft is also needed to give clearer direction in support of net zero targets, including the nature crisis, forestry, and - in support of our generation customers - the wild land policy (to meet the Scottish Government's 8-12GW onshore wind target).** *A rewording of these policies will be needed to create some flexibility in decision making for critical infrastructure when sensible and no other viable option is suitable.*

#### **Rewording Policy 3: Nature crisis:**

- **To help secure long-term enhancements in biodiversity we believe that there needs to be a transparent and quantifiable measure of biodiversity within NPF4 to allow consistent and equitable assessment, and to assist and create consistency in reporting and monitoring of biodiversity impacts and outcomes.**
- Current wording leaves it to the discretion of local planning authorities or others to determine what level of enhancement is sufficient for a particular project. This creates a risk of inconsistency in approach with varied expectations from project to project on what should or should not be delivered.
- This ultimately creates risk of project delay and legal challenge particularly if the developer and consenting body can't agree on how the biodiversity has been estimated (either the baseline or the enhancements) or what should be delivered. **Having an agreed set of standards at NPF4 level would be helpful to reduce this impact.**

#### **Tweaking Policy 34: Trees, Woodland and Forestry:**

- SSEN Transmission supports and is committed to a "no net loss" approach in woodland cover on new projects, delivered through our commitment to compensatory planting. We agree and recognise that the expansion of woodland and forestry should be prioritised in NPF4 to support net zero and biodiversity goals.
- Due to the extent of woodland cover within our operational area, there may be occasions where trees pose a risk to the safe operation of the network and may need to be removed. Although every effort is made to minimise such impacts and avoid where possible.
- The current wording of policy 34, does not allow for any flexibility in decision making for critical infrastructure and forestry, which creates a blocker to the delivery of grid investment.
- **To reduce this conflict, we'd welcome discussions with the Scottish Government to explore acceptable mitigation options for essential infrastructure, similar to current wording in NPF4's peatland and wild land policies in cases where there is evidenced locational need and no other site is suitable in the context of net zero delivery.**