

PL2009/224

**FORMATION OF DEVELOPMENT PLATFORM AND ERECTION OF
ELECTRICITY CONVERTER STATION (IN OUTLINE)**

Submission by Sustainable Shetland to Shetland Islands Council

Sustainable Shetland wishes to object to the above planning application, and wishes the comments on the Environmental Statement made below to be considered as grounds for the objection.

1. Planning Policy Context.

Although we note that the Shetland Structure Plan (SPP6 and SP Eng 3) supports the installation of an interconnector for the development of renewable energy, we do not believe that the Upper Kergord Converter Station and associated HVDC interconnector are "***necessary*** to facilitate the expansion of the renewables industry in Shetland (Table 5.1) nor "***integral*** to the successful development of the renewables industry in Shetland" (page 63) – except insofar as the Viking Energy Wind farm is concerned. [Our italics].

Moreover if the Converter Station and interconnector are, in this case, technically a legal requirement for SHETL to fulfil should the wind farm be built, we do not believe it is appropriate for SHETL to cite the UK Government Energy Review 2006 as a material consideration (5.2.2). We disagree that "the benefits to society and the wider economy as a whole are significant", in respect of this development.

2. Landscape and Visual Impact / Community (Socio-economics, land use, recreation)

2.a. We are disappointed that **Figures 5 and 6** (referred to in the Non Technical Summary (Landscape and Visual Amenity) as providing "computer visualisations of the anticipated appearance of the site following construction and restoration" are missing from the documentation. Nonetheless we dispute that the landscape and visual impact of the converter station will be negligible, and believe that it will have a significant cumulative effect with the wind farm, particularly as regards the turbines and infrastructure in the "Kergord Quadrant". The two are inextricably linked and will form an unacceptable degree of industrialisation of Shetland's landscape in this area. This is particularly true if receptors include people exercising recreation within the ZTV of the converter station, which will be flanked by up to 19 wind turbines 145 metres high (not 125 metres as stated in 8.5.28).

2.b. We question the assertion that any adverse effect on visitor perception "is expected to change over time as the proposed converter station becomes part of the landscape" (6.7.17). This is an entirely subjective assumption to make, and besides is not relevant to first-time or one-time visitors.

2.c. We consider that the sensitivity of tourism and recreation in the Weisdale valley should be considered as **high**, rather than **medium** (6.6.4) given the geological and environmental importance of the valley to Shetland's tourist industry, and the proximity of the Sandwater Core Path (and other walking routes that are used in the area).

2.d. We also do not accept that the converter station will be "a platform for the further development of renewables on Shetland" (6.8.7 and 6.9.4). The converter station is specific to the Viking Energy Wind farm, and we are not convinced that there will be any spare capacity for other renewables to link to this development, nor would its location necessarily be best placed for other renewables, e.g., tidal power.

Indeed, precisely because of its purpose, to serve the Viking Energy wind farm, the converter station may actually hinder the development of other renewables.

3. Carbon emissions (Geology and Soils)

3.a. SHETL states that the carbon footprint of the converter station is insignificant, and that any carbon footprint will be outweighed by the carbon savings of the VE wind farm.

It has been suggested in submissions (e.g., by Shetland Amenity Trust) to the Economic Consents Unit regarding the Viking Energy Wind farm application that there may be no carbon savings made by the wind farm, if, for example, the hydrology of the site is not restored.

3.b. No attempt has been made in the ES to assess the carbon footprint of the manufacture and transportation of the converter station building and equipment, nor of the interconnector cable. Not to assess the carbon emissions of these elements of the converter station is a **major omission** in the Environmental Statement.

3.c. Excavated peat on the converter station site is proposed to be used as infill for the interconnector cables, but peat may be replaced by, for example, cement bound sand (see Project Description 4.3.19/20), so we regard this as unlikely. No proposal is made as to the disposal of surplus peat if required on the interconnector route.

4. Freshwaters

4.a. The impact on several watercourses, which will be traversed by the HVDC cable on land, appear to have been omitted from the ES. These include burns which run through some of the Kergord tree plantations (which are SSSIs), and carry significant amounts of water throughout the year, and may contain a different spectrum of aquatic invertebrates than elsewhere, because of their wooded nature. It is not apparent that these have been surveyed, or otherwise considered.

4.b. The proposed access road to the converter station continues to Scallafield, crossing contours. The cumulative impact of drainage this will have on the converter station and associated watercourses is considered in 9.7.7 and 9.8.6. Given that heavy rainfall in this area of Shetland is by no means "exceptional", we cannot agree that "probability is

low”, nor that “the risk of cumulative effects is minor”. We note with concern also that this road traverses an area with a high risk of peat instability (see Figure 7.2).

4.c. We note with concern the proximity of the site (14 ha under construction and 5 ha when in operation) to the upper reaches of the Weisdale Burn which is used further downstream for a fisheries hatchery. Consultation with the owner of this facility while the development proceeds, such as is proposed, is an insufficient mitigation, given the scale of the development. Stockpiling of excavated peat close to the burn is in our view a dangerous proposition (figure 4.5). As in 4.b., we reiterate that heavy rainfall in this area of Shetland is not “exceptional”.

5. Traffic and Transportation.

We are concerned that there will be major upheaval, including reconstruction and re-routing of the B9075, between Sandwater and the proposed access road to the converter station and wind farm. The significance of this was entirely omitted from the Viking Energy submission to the Energy Consents Unit, and concerns about it were raised by Scottish Natural Heritage, with regard to the Sandwater SSSI. It is inadequate of SHETL to disregard the impact the upheaval will have on traffic, and on the environment, especially as this stretch of road crosses an area of deep peat.

6. Other material considerations.

6.a. Community liaison (4.3.16). No details are given as to how this important proposal will be implemented. Even if this is an outline planning application, more detail should have been included.

6.b. Maintenance. We are alarmed that maintenance of each interconnector circuit “will take place on a planned basis at a frequency of ***between one and six years***” (4.4.8 – our italics, particularly as it is stated that “minimal maintenance is undertaken...***though faults do occur*** which require...potentially a substantial excavation to cut out and replace...with new joint bays” (4.3.24 – our italics). (With regard to the latter, we note that if these are to have concrete (approx 10m x 5m) floors which remain *in situ*, although buried, no assessment of their effect on drainage is made).

7. Conclusions.

- **Sustainable Shetland has lodged an objection, with the Scottish Government’s Economic Consents Unit to the planning application for the Viking Energy Wind farm.**
- **We object to this particular development, given its specific purpose, which is to serve the Viking Energy Wind farm.**
- **We believe that this development may actually hinder the development of further renewable industries in Shetland.**

- **We consider, contrary to SHETL's assertions, that there is, moreover, a significant and unacceptable cumulative impact on the environment, community, and recreational visitors in the Kergord area, when considered with the Kergord quadrant of the wind farm.**
- **We believe that insufficient detail is presented in the Environmental Statement, notwithstanding that it accompanies an Outline Planning Application. That no assessment is made of the carbon emissions implicated in the construction and transportation of the converter station and interconnector is a grave omission.**

Yours sincerely

Billy Fox
Chairman
Sustainable Shetland
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Signature _____ Date 27th August 2009

cc Iain McDiarmid
Richard MacNeill