

Formal Objection to Further Renewable Energy Infrastructure in Caithness and the Northern Highlands

To: The UK Government Net Zero Committee and Relevant Planning Officials

Subject: Immediate Moratorium Required on New Energy Infrastructure Applications in Caithness and the Northern Highlands (Transmission Zone 1)

Dear Committee Members and Officials,

I am writing to express deep concern and strong opposition to the continued acceptance and approval of renewable energy infrastructure applications within Caithness and the Northern Highlands, which fall under Transmission Zone 1. This region has a Government-imposed cap of 2.5 GW (2,500 MW) for combined generation and battery export capacity to 2035. Current projects—either operational, consented, or under planning—already meet or exceed this cap, rendering any further applications unsustainable, unjustifiable, and in direct contradiction of the region's energy planning framework.

1. Systemic Failures in Planning, Oversight, and Ecological Integrity

Despite well-established guidelines and caps, applications continue to flood the system. Planning officers—often unaware or uninformed about the existing grid backlog and capacity constraints—are processing applications that, in practice, cannot be connected to the grid. This creates an artificial boom of speculative development, driven not by need but by a pursuit of government subsidies and constraint payments.

This unsustainable practice is further exacerbated by incomplete and rushed environmental assessments. Critical studies such as bird surveys are conducted outside appropriate seasonal windows, with entire migratory species missing from evaluations. The damage to land is frequently irreversible, with developers failing to restore sites to their original condition—Shetland being a clear and troubling precedent.

2. Parliamentary Concerns Confirm Widespread Breaches of Ecological and Planning Standards

The House of Commons Energy Security and Net Zero Committee has publicly recognised these failings. In a recent report, the Committee states:

“We are gravely concerned by reports that many ecological enhancements and landscape mitigations promised by developers are never delivered in practice. This indicates systemic

failings, brings the planning system into disrepute, and questions whether the Government will be able to fulfil its ambitions to build critical infrastructure in a nature-positive way.”

Furthermore, the Committee highlights the alarming disconnect between national planning policy and local strategic plans:

“It is not clear how the regional capacity limits... or the likelihood of a project securing a grid connection should be factored into decisions about development consent.”

This ambiguity fosters confusion and misuse of the planning process, encouraging proposals that disregard real-world infrastructure constraints and ecological protections.

3. Grid Capacity Backlog: A Known Crisis

The NESO Gate 2 Readiness Criteria openly acknowledge that some projects are being granted development consent prior to receiving grid connection offers, resulting in systemic bottlenecks. Approving additional applications in this environment is not only reckless—it actively amplifies the national gridlock crisis.

The report continues:

“It is clear from our evidence that whether a renewable energy project is likely to secure a grid connection is already a contested issue...”

It is imperative that no further applications be considered until this situation is resolved.

4. Violation of Key Policies and Environmental Commitments

Ongoing approvals also contravene multiple national and devolved policies, including but not limited to:

- NPF4 Policy 5 – which mandates the protection of peatland and carbon-rich soils.
- NPF4 Policy 6 – requiring the preservation and expansion of woodland and forested areas.
- NPF4 Policy 23 – prioritising human health, including from air and noise pollution.
- Updated Ramsar Policy Guidance – any development near Ramsar or ecologically sensitive sites must undergo rigorous HRA and receive NatureScot consultation, with approval only permitted under Imperative Reasons of Overriding Public Interest (IROPI).

Caithness is dominated by internationally significant peatlands—vital carbon sinks and biodiversity reserves. Even areas outside formal Ramsar designation must be treated as ecological buffer zones, contributing to the overall environmental resilience of the region.

5. Impact on Communities and Mental Health

The relentless submission of new energy applications has had a profound psychological and social toll on residents. Communities are being overwhelmed by the scale and frequency of proposals, suffering a sharp decline in mental well-being amid fears of irreversible landscape degradation.

The perception that Caithness is being treated as an expendable "sacrifice zone" is growing, and the community's trust in the planning system is rapidly eroding.

6. Absence of a Strategic Plan and Growing Exploitation of the Highlands

There is currently no comprehensive, publicly accessible plan governing the scale, distribution, or long-term consequences of major energy infrastructure developments in the Highlands. As a result, Scotland—and particularly the Highlands—has effectively become a dumping ground for multinational energy corporations and government-backed initiatives. We are consistently told that we have the 'right climate' and 'vast land availability' to support large-scale renewable developments. While that may have been true in the past, the reality today is very different.

Climate patterns in the Highlands have become increasingly erratic and unpredictable. This has already had real financial consequences, such as recent reports indicating SSE experienced profit losses due to extended periods without wind. Moreover, the claim that Scotland has abundant available land is demonstrably false. Land is being rapidly consumed by sprawling energy infrastructure, much of it irreversibly altered or degraded.

This land, in many cases, would be far better suited for farming—critical for ensuring future food security, particularly in light of global supply chain vulnerabilities. Yet, our government appears unwilling to listen or adapt. There is no plan in place that balances energy development with ecological sustainability, agricultural necessity, or community wellbeing. Without such a plan, chaos reigns—and the Highlands face cultural, economic, and environmental loss on an unprecedented scale.

Scotland's tourism industry, which is built around its iconic wild landscapes and natural beauty, is also under threat. Tourists have repeatedly stated they are drawn to Scotland for its unspoiled scenery, something which will no longer exist if current trends continue unchecked. Despite rhetoric from officials, the reality is that tourism remains one of Scotland's largest and most vital sources of income. Undermining this for short-term energy gains is shortsighted and destructive.

Crucially, the people of Caithness and the wider Highlands must have a formal seat at the table in all phases of decision-making—from initial scoping to final approvals. After all, it is their homes, lives, and livelihoods being irreparably altered.

The impact is already visible, and the question remains unanswered: What is your plan of action for the Highlands? If there is a balanced plan, why is it not transparent and accessible? Why have Highland communities not been presented with it?

When will the government say enough is enough?

When will the 'get-rich-quick' schemes involving BESS (Battery Energy Storage Systems) be brought to a halt?

When will the Government, Energy Consents Unit, and NESO collectively declare a moratorium and establish a long-overdue framework of fairness, responsibility, and balance?

In Conclusion: A Call for Immediate Action

Given the current situation—where:

- The regional capacity cap has already been met or exceeded;
- Grid connections are backlogged and speculative;
- Ecological and health policies are routinely bypassed;
- The planning system is undermined by systemic failings;

We strongly urge the UK Government and associated planning authorities to implement an immediate moratorium on all new energy infrastructure applications in Caithness and the Northern Highlands.

This pause must remain in place until:

- Grid reforms are fully enacted and operational;
- Environmental oversight is demonstrably improved;
- Strategic regional targets are transparently monitored and enforced;
- The cumulative burden on local communities is fully assessed.

Failure to act now risks permanently damaging one of the UK's most unique and ecologically rich landscapes, while undermining the very policies and standards designed to secure a just transition to net zero.

We respectfully request your urgent attention and a formal response outlining how these concerns will be addressed.

Yours faithfully,

L Parker, Chair: Dunbeath and Berriedale Community Say NO to PYLONS Action Group.

Betty Grieve. Pylon pressure to STOP SSEN Action Group.