

SUBMISSION FROM SCOTLAND BEFORE PYLONS

I refer to the invitation to submit evidence to the Committee on the NPF Document which is now in the 60 day period of review by the Committee.

In response to the questions contained in the Call for Views on behalf of Scotland Before Pylons please note the following evidence on only three questions:

Do the Policies set out in NPF 2 support the Government's Key aims for development of Scotland?

While Local Authorities may have been involved in consultations on the NPF2 we believe that only limited opportunity has been afforded the general public to assess the proposals. One of the key purposes of the Planning etc (Scotland) Act 2006 is to encourage greater local participation and involvement in the Planning process. The NPF deserves democratic support to be an effective tool in the Planning process to guide spatial development for the next twenty two years – a period of at least one generation of Scots and over five Parliaments. It is hard to confirm that the consultation on the NPF2 has truly been “an important vehicle for the national debate about the sort of place we want Scotland to be” (para 4 Introduction to National Planning Framework 2) or that the Framework has been “prepared with extensive stakeholder involvement” (para 11 Introduction to National Planning Framework 2). To rectify this omission the Parliamentary Committees will require to apply particular scrutiny to the draft during its passage through the Committee. We would encourage further consultation with local communities on the site visits as necessary to assess if the NPF2 meets the key aims for development of Scotland.

Has the correct balance been struck between economic development and environmental protection?

There will always be subjective views and possible healthy dissension between promoters of economic development and those who support the conservation of the environment. It is important to understand that economic benefits flow from a healthy and sustainable environment. This is particularly so in Scotland where the natural and cultural environment play a significant role in enhancing the tourism base of Scotland and the health of local communities. In this regard the environment is a stimulus to the economy – both locally and nationally - and should be protected as such. The guideline for the protection of the environment to be implemented in Scotland in support of NPF 2, should be the current highest level of legislation, including EU legislation. The Government and Planning Authorities should adhere strongly to this principle which should be breached only as a means of last resort in determining the best interests of the future of Scotland. Developers, both public and private, should be required to demonstrate through the environmental assessment procedures that they have exhausted all other options in support of a planning application within the NPF2 policies. Failure to so demonstrate should render an application invalid even if need has been established through the NPF2 national designations. The NPF2 should support that principle in selecting developments, and in instructions to Planning Authorities, who will be required to implement the developments.

By way of example, in our opinion the NPF 2 having identified the **need** for electricity to be generated in a particular area **should not specify a particular route** for an electricity transmission line. We support the prospect of renewable electricity generation in Scotland and recognise the economic opportunities for marine based generation as outlined at para 125. Equally we recognise the importance of securing an “affordable *<if defined as economic>* and sustainable *<if defined as protecting the environment>* energy supply” as required in para 330 at page 88. In support of this energy development the options for transmission should not be as per para 228, limited to those identified by “Scottish transmission owners” (TSO). The ongoing PLI into the upgrade of the Beaully Denny line by SHETL and SPT demonstrates the impact that any transmission line makes on the environment **and** the economy both locally and nationally.

Having established the need the NPF 2 should require a far reaching analysis of alternative routes should be explored in approving a particular transmission route. It is probable that such an analysis is best completed by an independent assessor as it will go beyond the expectation of an ESA. The NPF 2 on Map 18 identifies a range of potential options for linking generation supplies to points of demand, which suggests that the need for a particular route is now established. That conclusion should not be the responsibility of NPF2. Any transmission option could be selected by potential developers, possibly in concert with Scottish government. Transmission routes should not be limited to particular overhead routes as Beaully Denny or the east Coast line on Map 18 or as identified as at Development 7 on Map 20. As suggested above a full review of all transmission options including under grounding options (which appear not to be mentioned in the NPF 2) and sub marine routes (as are already being researched as indicated for connections to Europe as at para 230) is required before any proposed route is approved for development. This is particularly so when overhead transmission line structures are out of all proportion in scale to much of the landscape through which any overhead line must inevitably pass en route from North Scotland to the central belt. It is also important not to proscribe opportunities that will be available through technological developments over the period to 2030.

The point above is laboured because with the exception of grid reinforcements as at Development 7 on Map 20 all the remaining proposed designations are site specific. The arguments for independent analysis do not therefore apply to consideration of alternative site options. NPF 2 has decreed the need for site selection. The ESA analysis will address the key question of the priorities to be given to economic development and environment protection. In the case of transmission routes any assessment can not be adequately quantified if transmission routes are selected in the NPF 2.

If opponents of any transmission new or upgrade are considered to be taking a subjective approach to the NPF2 they are doing so in support of the future of Scotland, both in securing a viable energy supply and in preserving the environmental interests of the country. We believe however that currently NPF 2 in designating specific routes, does not take full advantage of possible future transmission options and will be setting a lower level of review of opportunities than should be expected by this and future generations in deciding the future infrastructure for Scotland. Transmission route selection should not be included in the NPF2.

The key priorities set out in the spatial perspectives section.

The spatial perspectives relate to the vision that Scotland should strive to maintain. The descriptions of localities across Scotland illustrate the breadth of diversity and potential strengths of the country's resources that should be promoted and enhanced.

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Chairman
Scotland Before Pylons

Scotland Before Pylons is an umbrella group supporting local communities seeking improved routing for electricity transmission routes.