

## SUBMISSION FROM STIRLING BEFORE PYLONS AND FRIENDS OF THE OCHILS

It has just been brought to our attention that the National Planning Framework 2 (NPF2) was published on 12 December 2008, and that comments on the NPF2 process are invited, to arrive by tomorrow. As people who put a great deal of our own time and effort into writing a response to the Draft document, and attending one of the seminars on it, we had expected that the Scottish Government would alert us to its publication. That they did not amounts, in our view, to an example of failure to properly involve the public in the preparation of this document.

As participants in the year-long public inquiry into the Beaully-Denny power line, we learnt much about the planning process. It is clear to us there is much to be said on the inadequacies of the consultation process for NPF2, and we support the conclusions of Claire Symonds in her report, "A Critique of the National Planning Framework (NPF) Consultation Process".

In particular, we believe that the assumptions in NPF2 regarding the reinforcement of overland electricity transmission lines have not been subjected to anywhere near sufficient consultation and scrutiny. We therefore contend that it is inappropriate for such infrastructure developments to be included in NPF2 (at paragraphs 158 and 159). In summary, our reasons for this are as follows:

- While we accept, of course, that the provision of energy generation requires suitable arrangements to be made for the transmission of the electricity generated, we contend that the strategic options available in the transmission process have not been properly explored or consulted on.
- The key issue is the potential development of sub-sea cables for electricity transmission. NPF2 acknowledges at paragraph 160 that the Crown Estate has published proposals for such a cable off the UK's East Coast, and that further sub-sea developments are being actively pursued.
- If one or more sub-sea cables gets put in place, it is likely to have profound implications for the need for any further reinforcements of overland transmission. At the Beaully – Denny public inquiry in 2007, the applicants' own evidence was that sub-sea cables would be perfectly satisfactory alternatives, from a technical perspective, to the highly controversial overland upgrades that they were seeking. Their only reason for seeking an overland upgrade was one of cost, but this would be negated should suitable sub-sea capacity be provided anyway. The way that sub-sea cables would impact on the need for overland grid reinforcements should

be thoroughly explored before setting out an acceptance of a need for overland reinforcements in NPF2. To the best of our knowledge, this has not been done.

- Without it, transmission companies will be able to claim that the need for overland reinforcements has been established, because they are included in NPF2, when in fact no proper analysis of such need has been carried out. This goes profoundly against Mr Swinney's statement on 13<sup>th</sup> September 2008 that "Designation in the framework is the mechanism for establishing the need for such developments" - the need for overland grid reinforcements has only been asserted, not established.
- Mr Swinney states that the need for infrastructure investment is to "build a Scotland that is wealthier and fairer, smarter, greener, healthier and safer and stronger". Stirling Before Pylons and Friends of the Ochils provided a great deal of evidence to the Beauldy-Denny public inquiry. This showed that overland, overhead power lines can have profoundly important negative impacts on the health of people living too near to them – see the precognitions by Henshaw, O'Carroll, C Paterson and I Paterson at <http://www.beauldydenny.co.uk/DocumentLibrary/StrategicSession/FullPrecognitions/ObjectionGroups.aspx>, and the evidence by Dr Richard Simpson MSP at <http://www.beauldydenny.co.uk/DocumentLibrary/LocalSessions/Stirling/FullPrecognitions/ObjectionGroups.aspx>.
- Peter Pearson's evidence on the Eastern Villages showed that the construction of overhead power lines may severely disadvantage already disadvantaged communities – going against the aim of a fairer Scotland - see <http://www.beauldydenny.co.uk/DocumentLibrary/LocalSessions/Stirling/FullPrecognitions/ObjectionGroups.aspx>
- Evidence by Nicki Baker on the Ochil Hills, and by Sinclair, both at the web reference above, and by Scottish Natural Heritage at <http://www.beauldydenny.co.uk/DocumentLibrary/LocalSessions/Stirling/FullPrecognitions/NationalBodies.aspx>, established the major negative impacts on the Ochil Hills AGLV, a designated area, going against the aim of a greener Scotland.
- Evidence by Fraser at <http://www.beauldydenny.co.uk/DocumentLibrary/LocalSessions/Stirling/FullPrecognitions/ObjectionGroups.aspx> showed how the proposed overhead line would have serious negative impacts on tourism in the Stirling area, going against the aim of a wealthier Scotland.
- In addition, there is significant evidence that overhead power lines are profoundly unpopular with the general public and have virtually no admirers. The fact that more than 17,000 objections were made to the Scottish Executive, against the Beauldy-Denny proposals, with just 43 letters of support, emphasises this.

- All of the above negative impacts would be resolved - for the Stirling area - if the power line were to be put underground – a process accepted by the applicants' evidence as feasible. Undergrounding is much more expensive – but the costs can be justified for the Stirling area and would be shared by electricity consumers across the UK. However, crucially, it is not technically feasible to underground the majority of the length of the proposed line, so many of the negative impacts of the whole project cannot possibly be removed.
- The above detail, unavoidably specific to the Beaully-Denny case, is given in order to make the general point that since overland power lines inevitably include long sections of overhead cable, they will inevitably be profoundly unpopular with the public, and will inevitably have severe impacts that go against Mr Swinney's, and the Scottish Government's, fundamental aims.
- While this does not automatically rule out the reinforcement of the overland electricity grid in Scotland, it does show that proposals for such reinforcements should not be included in NPF2 until such time as the sub-sea alternatives have been thoroughly, publicly and transparently debated. As this process has not, so far as we know, taken place, we believe that the process of preparing NPF2 has not met the criteria of all elements contained within it being proved to be essential.

We hope these comments will be taken into account when the Local Government and Communities Committee considers whether the NPF2 proposals listed as national developments meet the criteria set out by Ministers on 13 September. In our view, they do not.

We should be happy to provide any further information required.

Peter Pearson  
Secretary  
Stirling Before Pylons

Dr Nicki Baker  
Vice Chair  
Friends of the Ochils

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