

STIRLING BEFORE PYLONS

acting with

FRIENDS OF THE OCHILS

as a Relevant Person Group

for the purposes of the

STIRLING SESSION

**of the Public Inquiry into
Scottish & Southern Energy's proposals for the
Beauly to Denny 400 KV Steel Tower Double Circuit
Overhead Electricity Transmission Line**

PRECOGNITION

Dr Nicki Baker

Context and Process

MY CREDENTIALS

1. My name is Nicki Baker. I live in the area known as Logie. My house is situated some 400-500 metres from the proposed power line upgrade, to the north of and above the University of Stirling.

2. I have a first class honours degree in Mathematics, and a PhD in human aspects of transport policy. I was a Chartered Statistician for a number of years up until my retirement.

3. I worked for 31 years in a number of analysis, research and statistics posts, with strong links to public policy-making and practice. From 1970 to 1982 I worked as an analyst, researcher and lecturer in Transport Studies in University College London, and the Universities of Newcastle upon Tyne and Aston in Birmingham. From 1982 to 1987 I was a senior research officer in the Information & Statistics Division of the Common Services Agency of the Scottish Health Service. From 1987 to 1991 I was a senior policy analyst at Lothian Regional Council. From 1991 to local government reorganisation in 1996 I was the Head of Research & Information in the Development & Planning Service of Central Regional Council, and went from there to being Head of Research & Intelligence at COSLA, the Convention of Scottish Local Authorities. I retired at the end of 2000.

4. I worked on a number of projects that were of relevance to the issues that relate to the power line application. These included:
 - Participating in a large multi-agency research project studying the impacts of the building of the Tyne & Wear Metro, a very large infrastructure investment (1978 – 1980).

 - Heading up the provision of social, environmental and economic research, and Geographic Information Systems, required to support

corporate services, including planning and economic development services, in Central Regional Council (1991 – 1996).

- Carrying out analyses of inequalities in health, and child poverty, in different geographical areas of Lothian Region and Central Region (1987 – 1996).
 - Working with the complex mathematical models used to distribute government grant to the health service and local government (1982 – 2000).
 - Working in partnership with all sorts of local authority services, politicians, the Scottish Executive, the voluntary sector, academics, etc. (1982 – 2000).
5. Starting the year before I retired, I retrained and have been practising as a counsellor / psychotherapist since 2000. I gained professional accreditation in this field in 2005.
6. I have had a great love for hills since early adulthood, and was attracted to move to Scotland 25 years ago by the wonderful scenery. In my earlier years, I did a great deal of hill walking, in Scotland's highest hills and abroad; more recently, I continue to walk as often as possible, but on smaller hills, mostly in the western Ochils.

SCOPE OF EVIDENCE

7. This precognition has two parts. The first sets the context for all the evidence brought to this Inquiry by Stirling Before Pylons and the Friends of the Ochils. It compares the major concerns expressed by people in the Stirling area with those expressed nationally, and puts them into the context of the characteristics of this area and its residents' values and priorities. The area's response to the Scottish Executive's formal

consultation on SSE's proposals are shown to be congruent with the general public's attitudes towards power lines. The main areas of concern are also shown to go counter to the policy priorities of successive Scottish Governments.

8. The solution to the concerns in the Stirling area is seen to be either to put the power line underground throughout this area, or to put it under the sea.
9. In the second part of the precognition, I express my concerns about a number of inadequacies in the consultation process, and ways that the planning process and the Inquiry result in excluding virtually all participation by members of the public.

10. I outline:

- The role of the Friends of the Ochils
- The Stirling area and its residents
- Responses to the Scottish Executive's consultation, from the Stirling area
- Public attitudes to overhead power lines
- Public policy priorities
- Solutions are under the ground or under the sea
- Some aspects of the inadequacies in the consultation process
- The way that the planning process excludes so many people

FRIENDS OF THE OCHILS

11. I am a founder member of Stirling Before Pylons, and the Chair of the Friends of the Ochils. I was active in the Dumyat Action Group, an informal group set up in 2003 and later subsumed into Stirling Before Pylons. Mr Pearson is setting out the role of Stirling Before Pylons.

12. I was invited to join the Committee of the Friends of the Ochils in January 2005, as a consequence of my work with the Dumyat Action Group (referred to later in this precognition and in my Landscape precognition). I was invited to take on the new post of Vice Chair in summer 2005, and became the Chair in summer 2006.
13. The Friends of the Ochils is a Scottish charity, number SC022034. It has some 190 members. The organisation was founded in 1993 by Dr Rennie McOwan. Dr McOwan was hoping to give evidence to the Inquiry but unfortunately his health does not allow this. An article, recognising and celebrating his contributions to the issues of access to the Scottish hills, was published recently in *The Scottish Mountaineer* (document StBP / 4 / 24).
14. The publicity leaflet used by the Friends of the Ochils is included as document StBP / 2 / 3. The Constitution (document StBP / 2 / 4) identifies the aims of the charity as:
- a] To promote and conserve the landscape, natural beauty and wildlife of the Ochils, and to protect the historical and social character of the surrounding communities.
 - b] To encourage consistent implementation of good planning policies appropriate to the other objects of the Association.
 - c] To support responsible and well behaved public access to the Ochils consistent with the Scottish Outdoor Access Code.
 - d] To promote appropriate study of and research into relevant fields of interest pertaining to the Ochils and its local communities, and to promote dissemination of the results of such study and research.
15. In order to achieve these objects the Association's Constitution sets out that we will:

a] Co-operate with other bodies having similar objects or interests, and will muster and articulate public opinion on relevant matters.

b] Co-operate wherever possible with landowners, farmers, shepherds, foresters and other people who earn their living on and from the hills, but always within the above objects of the Association.

c] Include in its area of activity any community or site felt to have a distinct Ochils connection.

16. Our work in relation to SSE's application to upgrade the Beauly – Denny power line, and our involvement in the Public Inquiry process, is clearly wholly congruent with our Constitution. Our members have wholeheartedly endorsed this work at the two most recent AGMs, with motions approving and supporting our actions being passed unanimously in 2005 and with one abstention in 2006.

THE STIRLING AREA & ITS RESIDENTS

17. The southern end of the Beauly – Denny power line runs, of course, right through the Stirling area. This would contain some 10% of the total length of the line, but as it has a much higher density of population than other areas, it holds a far larger proportion of the people who would be affected by it.

18. The whole of the City of Stirling lies within 5 km of the line, as do many large villages such as Cowie, Fallin and Plean (the "Stirling Eastern Villages"), Bridge of Allan and Dunblane in the Stirling Council area, as well as Denny and Larbert in the Falkirk Council area, and Tullibody in the Clackmannanshire area. This amounts to some 82,000 people living in settlements within 5 km of the proposed line – including 70% of the population of the Stirling Council area. In addition, within 10km of the

proposed line are to be found Stenhousemuir and Falkirk, in the Falkirk Council area, and Alloa and Clackmannan in the Clackmannanshire Council area – substantial proportions of both their populations live within this distance of the line.

19. I do not have figures for the total population living within 5 /10 km of the entire length of the proposed Beaully – Denny line but it seems likely that a very substantial majority of all of them live within the Stirling – Clackmannanshire – Falkirk Council areas.

20. Stirling Council has carried out regular surveys of its residents' quality of life (StBP / 4 / 13) and perceptions of living in the area (StBP / 4 / 14). Health, naturally, is one of people's prime concerns (the other being safety): 87% say it is very important, 13% fairly important, even though only 37% are very satisfied with their health, while 45% are fairly satisfied.

21. Residents rate the area very highly as a place to live (42% very good; 50% fairly good, according to the Quality of Life survey). The non-built environment plays a substantial role in this: 68% rate it very important, 25% fairly important, while 17% say they are very satisfied with it, and 55% fairly satisfied. Access to the countryside contributes a lot: 85% rate this very or fairly good. Woodlands are also much valued, and half of the respondents said the loss of woodland and open space was a problem. In all, two of the top four factors contributing to making Stirling a good place to live relate to the outdoors environment:

Table 1: Top four factors contributing to make Stirling a good place to live

<i>Factor</i>	<i>% of respondents</i>
Good community / friendly neighbours	37%
Access to countryside / open spaces	29%
Good, attractive, pleasant environment	25%
Good transport links / easy commuting	24%

Source: StBP / 4 / 13

22. The Council's Residents Survey (StBP / 4 / 14) confirms the importance of the natural environment. This is rated top out of a set of 7 aspects of life in the area, with a net satisfaction rating of 73%. Satisfaction with the natural environment is, unsurprisingly, higher in the rural areas than it is in the urban areas. Nevertheless the net satisfaction of those in the urban areas is still high, at 66% - no doubt influenced by the way that views of the Ochils and other major hills can be seen from many parts of the city.

23. The environment of the Stirling area is clearly of major importance to the people who live there. It must play a major role in attracting both people and employers into the area, and in keeping people and businesses there. It must therefore be a significant factor in the success and growth of the area.

24. Some of the potential for the proposed Beaulay – Denny upgrade to be of concern to the people of the Stirling area can be surmised from these figures:

- A very large number of people in this area live quite close to the proposed line, and they care a great deal about their natural environment.
- Half or more of all the properties located very close to (within 600 metres of) the proposed line are in the Stirling section, with large areas of the Eastern Villages unpleasantly close to the line, and some individual properties, particularly in the Logie area, potentially underneath it. The potential for negative visual impacts is obvious. And with the constantly growing evidence about the health implications of living near high-voltage power lines, and the importance of our health to us all, this too must be expected to feature strongly in the way people respond to the proposals.
- Nearly all the businesses in the Stirling area are located within 5 km of the line, including many that rely wholly or largely on tourism. Again,

though lacking quantified data, it must be the case that a significant majority of all the businesses within 5km of the proposed line are located in the Stirling – Clackmannanshire – Falkirk area.

25. There is so much more to be said about the Stirling area, and its importance in national and not just local terms. As Stirling Council's successful bid for City status emphasises (StBP / 6 / 10), it is a place of immense historical significance. Stirling Castle and the National Wallace Monument are iconic symbols, standing out against the backdrop of the Ochil Hills, visited by hundreds of thousands and seen by millions every year as they visit, move around and pass through the area. Several very important battles were fought here, including the one at Sheriffmuir. All of these stand to be significantly affected by the power line proposals.
26. It is also worth noting in passing how many of the people quoted in the City status bid cited above are giving evidence against the power line to this Inquiry: Tommy Brookes, Elspeth King, James Fraser; and Rennie McOwan would be giving evidence if his health allowed.
27. The evidence being brought on behalf of Stirling Before Pylons and the Friends of the Ochils will go into detail on all the above issues.

OBJECTIONS TO SSE'S PROPOSALS

28. After SSE published their proposals in October 2005, the Scottish Executive invited responses from the public, up until 12th December 2005. The process started messily, with SSE publishing an announcement in the local newspaper that appeared to mark the start of the formal consultation, but with the Executive then announcing that the formal start was not until some weeks after. They consequently received, but ignored, 807 responses (which we may reasonably assume to be objections) from the public between those dates.

29. Even so, in the course of the formal consultation period, the Executive received 17,295 letters in relation to SSE's power line proposals (see document StBP / 2 / 11). I requested and received summary information about all these responses, and was therefore able to do some basic analyses of them, over and above the analyses which the Executive had done themselves.
30. Of the 17,295 allowed responses, just 45 expressed support for the proposals; many of these came from companies involved in the wind energy industry. A substantial proportion came from outwith Scotland. Only 21 supporting responses came from private addresses. The responses are summarised in StBP / 2 / 13. All the remaining 17,250 letters objected to the proposals – an extraordinary imbalance.
31. The Scottish Executive's Energy Consents Unit identified a list of 54 parameters of the content of the responses, and logged each response onto two very large spreadsheets, according to this schema. The spreadsheets are replicated on the CD, StBP / 2 / 11a.
32. Seven parameters were included in the large majority of the responses:

Table 2: Most important objections by topic; all objectors

Nature of Objection	No. of objectors	% of total objectors (17,250)
Landscape and visual amenity	17,124	99
Effect on tourism	16,799	97
Undergrounding is an option	16,556	96
Recreation area	16,219	94
Need for PLI	16,126	93
Effects on health	13,941	81
Archaeology & cultural heritage	13,617	79

33. All these topics feature strongly in the case we are putting to this Inquiry. The next most frequently cited topic was included in just 51% of the responses.

34. I used the data provided by the ECU to examine the responses from the Stirling area. The data included objectors' addresses, and I pulled together those coming from postal area FK, and those without a postcode but coming from a town within the FK postal area. There were a total of 3,924 such objections, and just two letters of support.

35. The objections, summarised in Table 3 below, showed largely similar patterns to those in Table 2 but with even more people expressing concern about archaeology / cultural heritage (94%) and health (94%) – both unsurprising, given these are both issues of major importance in the Stirling area in the context of this application.

Table 3: Most important objections by topic; objectors from FK postal area

<i>Nature of Objection</i>	<i>% of total objectors (3,924)</i>
Landscape and visual amenity	99
Effect on tourism	97
Need for a PLI	96
Undergrounding is an option	95
Effects on health	94
Archaeology & cultural heritage	94
Recreation	90
Business & employment	88

36. Eighty eight per cent of the Stirling area objections also cited concerns about business and employment, compared with only 38% nationally – again unsurprising, given that so many businesses, including tourism-related businesses, are located within 5 km of the proposed line in the Stirling area.

37. These results from the Stirling area fit comfortably with the overview outlined in paragraphs 19 to 21 above.

PUBLIC ATTITUDES TO OVERHEAD POWER LINES

38. Outsiders may wonder why there has been such widespread opposition to the proposals to build a high-voltage, overhead power line. In our experience, this is a very real phenomenon: unlike the case of wind farms, where a proportion of the population clearly supports the concept, and some like the reality, even though others are strongly opposed to them, virtually no one has a good word to say for electricity pylons. As campaigners against the current proposals, we find support and encouragement wherever we go; just one person, in the last 3 years, has said to me that he actually likes pylons!

39. There is relatively little research and other evidence on this topic, but it is growing, and it all points in a similar direction. VisitScotland's research on the perceptions and preferences of visitors to 6 rural towns in Scotland (APL 10/6/8), discussed at some length in the Strategy session, found that people disliked power lines substantially more than any other kind of man-made infrastructure in the natural landscape. Table F-45 of that document shows that no fewer than 51% of respondents stated a dislike of electricity pylons and wires, whereas Table F-46 shows that just 1% of respondents said they liked them – a net figure of 50% against. The next most disliked feature, mobile phone masts, had 35% of respondents against them and 2% for, a net figure of 33%.

40. Prof Nick Hanley and colleagues have recently completed and made public an important piece of new research at the University of Stirling (StBP / 2 / 23). This research, titled "Measuring the Economic Impacts from Overhead Electricity Transmission Lines: the Beaully – Denny Proposal" was conducted in the Stirling, Bridge of Allan, Falkirk and surrounding rural areas. The report states (page 4):

“... 62% of respondents stated that they were opposed to the new transmission line, with only 17% in favour. This is mainly due to the impression on the part of respondents that transmission lines have a very serious negative impact on the landscape. Almost 80% of

respondents think the overhead transmission lines would have a 'negative' or 'very negative' impact on the landscape, whilst only 8% consider the impact 'positive'."

41. The research was designed to put a cost / value on the damage to the landscape in the Stirling area that would result from the power line upgrade, and the report concludes:

"...The main conclusion is this: the Beaulay - Denny line, as currently proposed, will impose significant economic costs on residents in the Stirling area, and is opposed by the majority of households. Given a total of 36,174 households living in Stirling Council area, this would involve an economic cost of at least £6.5 million per year if the overhead line proposal went ahead, assuming that our sample mean is representative of respondents throughout the council area."

42. If the results were applied to the people of Clackmannanshire and Falkirk who live within 5 km of the proposed line, the impacts would presumably be greater still.

43. Prof Hanley is giving evidence on this work to the Inquiry.

44. Further evidence for the near-universal dislike of overhead power lines is given by Bill Bryson, the well-known writer and new President of the Campaign for the Protection for Rural England (CPRE). Shortly after the announcement of his election as President, Bryson published (StBP / 2 / 19) an article setting out his vision for CPRE, including three matters that he intended to pursue. Number two was the removal of pylons and wires:

"Second, pylons and wires generally. To me, marching ranks of pylons are way too common in the countryside, and inexcusably alien and ugly. Too often when you go into the countryside you end up feeling as if you have wandered onto a set from War of the Worlds. In 1986, when electricity companies were being privatised, the Economist magazine calculated that if all the generating companies were required to devote one half of 1% of their turnover to burying overhead cables, we would be able to bury 1,000 miles of them every year. There are 8,000 miles of high voltage power lines in this country, so they would all be buried by now."

45. In all these ways, the evidence points in one direction and one direction only: people really dislike overhead power lines, and there is consequently very strong support for putting power lines underground, even though that costs money. And it has to be realised that the degree of dislike and opposition cited here will predominantly be generated by the experience of 132kV power lines – one can only speculate how much more unpopular the much larger 400kV lines would be.
46. The evidence suggests that the issue that is of the very greatest concern is the impact on the landscape – the visual impact. More than 99% of objectors to the consultation cited this as an issue, both in the Stirling area and for all the objectors. This is of no surprise when we consider how much importance the people of Stirling attach to their non-built environment, and how widely the upgraded power line would intrude on the landscape.

PUBLIC POLICY PRIORITIES

47. The issues identified as priorities in relation to the power line proposals by the people of the Stirling area – landscape, tourism and the economy generally, cultural heritage, health - are all within areas of high priority in terms of Scottish public policy. For many years now, there has been a broad political consensus about Scotland's policy priority areas, these being the economy, the environment, health and inequalities in health, and poverty and social disadvantage.
48. Under its Labour administrations, the Scottish Executive published document after document, setting out the main policy areas and the key strategic objectives. The new SNP Government, while obviously wanting to distance itself from the previous administration, and to put forward its own detailed programmes for action, nevertheless inevitably endorses all the main areas of concern in its first policy document (StBP / 1 / 32).

49. Extracts from some of the relevant policy documents are included in section 1 of the StBP documents. All aspire to improvement and enhancement in the relevant areas; all recognise the fundamental importance of taking a sustainable approach. The concerns of the people of the Stirling area are that, in relation to each of these issues, the power line proposals would impose damage, not improvement.

50. The economy perhaps figures highest in the public priorities. The Partnership Agreement (StBP / 1 / 4) between the Labour and Liberal Democratic Parties, reached in 1997, says (page 6):

“Growing the economy is our top priority. A successful economy is key to our future prosperity and a pre-requisite for building first class public services, social justice and a Scotland of opportunity.”

51. Tourism is recognised as playing a key role in the growth in the economy. Page 8 of the Partnership Agreement states:

“We will work with tourism businesses ... We will build on our cities’ many attractions and the natural resources of our countryside ... to turn Scotland into a year-round destination. We will ensure that tourist offices and agencies promote the opportunities for outdoors recreation across the country.”

52. One important factor in the required growth of the tourism economy is to achieve a substantial increase in visitors from the USA. Business and tourism experts in 2007 identified 10 key areas for improvement of which the third was “To improve ancestral tourism”.

53. James Fraser will show how much damage would result to the economy of the Stirling area if the power line proposals were to be approved. Virginia Wills’ evidence covers an area of considerable importance to the attraction of “ancestral tourists” to the area – the Sheriffmuir battlefield – and shows just how badly this would be impacted by the proposals.

54. The Rural Development Programme for Scotland 2007-2013: Strategic Plan (StBP / 1 / 24) emphasised:

“Priorities are to ... safeguard and enhance landscapes and the historic environment by conserving and enhancing the distinct identity, the diverse character and special qualities of Scotland’s landscapes ...

... Scotland’s natural resources are key assets. They provide an infrastructure for rural development that we must sustain. Scotland’s biodiversity and landscapes are main drivers behind our successful and growing tourism industry.”

55. Our witnesses dealing with landscape, the historic environment and cultural heritage issues will show that the power line proposals would, again, significantly damage these in the Stirling area, not enhance them. Prof Hanley goes on to show how much the people of the Stirling area would be willing to pay, to avoid the disbenefits to them of the damage to the landscape.

56. Concern for the environment, and ensuring the sustainability of development, are fundamental “givens” in public life today. In his keynote speech on Environmental Justice (StBP / 1 / 3), Jack McConnell stated:

“Today I will set out why sustainable development matters to me. Why the environment is central to my political priorities – and most of all why sustainable development matters to the people of Scotland.

... The Partnership Agreement ... committed us to integrating the principle of environmentally and socially sustainable development into all government policies.”

57. Choosing Our Future: Scotland’s Sustainable Development Strategy (StBP / 1 / 6) sets out the common goal for sustainable development as:

“... To enable all people ... to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations...”

... [We] want to build a Scotland that ... provides a quality environment for all ... Priorities [include] securing environmental justice for those

who suffer the worst local environments; protecting our natural heritage and resources for the long term ...”

58. Peter Pearson’s evidence shows how the routing of the proposed power line so close to Stirling’s Eastern Villages would go right against these aspirations, and Archie Bone and Tommy Brookes give the perspective of two local communities on the issues.

59. The poor health of the people of Scotland has been well recognised for decades. The Partnership Agreement (StBP / 1 / 4) stated:

“Improving Scotland’s health is central to the welfare of our society. Our poor health record is well known.

... Too many lives are damaged by a blighted environment.”

60. Improving Health in Scotland: The Challenge (StBP / 1 / 13) said:

“There is both a need and the opportunity to boost the health (physical, social and mental) of the people of Scotland – something that is fundamental to the happiness and prosperity of individuals, families, communities and the whole country. Scotland faces a tougher challenge to improve health than most other countries in the western world.”

61. The evidence brought by Ian Paterson and Caroline Paterson shows how reasonable it is for people in the Stirling area to be concerned about the possible implications for their health of the power line proposals, and set out the justification for taking a precautionary approach to the siting of any new overhead power line.

62. Concerns about the major inequalities in health experienced by people in different areas started to surface in the early 1980s. Now, the link between poor environments and poor health is becoming increasingly of concern to the makers and leaders of public policy. Jack McConnell’s Environmental Justice speech included the statement:

“A healthy environment contributes to our well being, and we are committed to improving our national health. Scotland’s record and the inequalities that still exist in health are intolerable.”

63. But inequalities not only persist, they are increasing. The Chief Medical Officer, in his annual report for 2006, stated:

“The health gap between the most and least affluent is widening and people living in deprived areas have a significantly shorter life expectancy than those in more affluent areas. ... The Scottish policy is to improve health for all and to reduce the health gap.

64. He recognised that:

“Evidence that contact between human beings and nature is good for health reinforces the importance of stewardship of the natural environment and the pursuit of sustainability.”

65. Sustaining and enhancing the natural environment is important not only for the economy, and for people’s sense of well-being, but even for their health. But the Chief Medical Officer goes further, and outlines the new interest in ways that the physical environment may impact on people’s health, and contribute to their ill-health:

“Medical science is now considering the role played by the stresses of social disadvantage in the disease processes underlying inequalities in health which persist even after differences in health-relevant behaviours are taken into account. A contribution from the physical environment to these stresses is certainly plausible, given the correlation between disadvantaged social circumstances and environments which are damaged, visually unappealing and threatening, yet residents are largely unable to affect change.”

66. He went on to outline how researchers are starting to investigate the link between “incivilities” in the environment, and health. These incivilities are aspects of the environment about which people might feel negatively, and the Chief Medical Officer’s list included overhead power cables. Early research findings included:

“Those who believed the environment in their neighbourhood is poor were more likely to report anxiety, depression and a generally poor state of health.”

67. Dr Richard Simpson’s evidence links the known association between living close to a high-voltage power line and serious disease, with the inequalities in health experienced in the Eastern Villages.

SOLUTIONS ARE UNDER THE GROUND OR UNDER THE SEA

68. All the above quotes give glimpses of the many ways in which the power line proposals would go directly counter to the aspirations of public policy priorities in Scotland, as well as being unacceptable to her people, and to the people of the Stirling area in particular. Our witnesses will spell out more of the details of how this impacts on the Stirling area.
69. The needs that the power line would meet are principally to have the capacity to export excess levels of electricity generation to markets outwith Scotland. There may be a need for such export capacity, but it should be acknowledged that those who benefit most from it are the companies concerned (and their shareholders), and the consumers importing the electricity. But the very many environmental costs of providing for it via an all-overhead line fall on the people and businesses of Scotland and, as we will show, fall disproportionately on the people and businesses of the Stirling area.
70. From the evidence given by their witnesses to the Strategy session, SSE’s proposals were clearly arrived at principally on the basis of their technical assessment, with a thin and at times unconvincing gloss of environmental assessment being added after the basic decision had been taken to propose the overland, overhead power line upgrade. They ignored large amounts of information given to them at the consultation stages, and omitted from the Environmental Statement much that should have been included. They also chose to gloss over and to dismiss, in the

most desultory manner, the potential for undergrounding sections of the line, as a means of avoiding some of the worst environmental impacts.

71. Yet, as the analysis of the objections to the Executive's consultation on their proposals, from Scotland as a whole, and from the Stirling area in particular, shows so clearly, undergrounding is seen by the large majority of people as the correct way forward to minimise the environmental impacts of any new inland power line. Simon Allen and Peter Pearson set out our case on this.
72. But even undergrounding may not be the best way forward. On the day the Inquiry started, BBC TV's Newsnight Scotland featured Brian Wilson, ex-Labour Minister, now chair of a renewable energy generation company, and Mark Ruskell, then a Green MSP. They were in agreement that the proper outcome to the issues was likely to be either the undergrounding of key sections of the route, or moving to a sub-sea solution.
73. SSE's own evidence to the Strategy session identified that sub-sea options are perfectly feasible, and would be justified on a straightforward cost basis if the alternative costs of undergrounding parts of the Beaulieu – Denny line were high enough. And that was only taking into account the Beaulieu – Denny upgrade. Other witnesses for SSE identified that, even if this upgrade goes ahead, there will very soon be further upgrades and new lines that will be needed to deliver sufficient capacity to export the excess of the renewably-generated electricity that is planned. It looks very likely that, if an appropriate overview is taken of all the current and near-future developments are taken into account, then a sub-sea option could be by far the best solution.
74. Stirling Before Pylons set out, from the beginning of the consultation process, our view that there is a need for a Strategic Environmental Assessment to be undertaken as the necessary first step to resolving the issues raised by SSE's proposals to upgrade the Beaulieu – Denny line. For the record, this continues to be our view.

INADEQUACIES OF THE CONSULTATION PROCESS

75. To complete this precognition, I wish to add some remarks about the processes used in the development and planning of these proposals. From first hearing about the proposed upgrade of the power line, it has been of considerable concern to me that the consultation process was inadequate. SSE made no attempt, at any stage of the process, to inform all the people living close to the line. To do this nowadays would be straightforward, with the availability of GIS technology and various suitable databases, and it was called for very clearly in at least two of the public meetings held in the Stirling area in 2004.
76. Without people being directly informed, news travelled mainly by word of mouth, rather than by the efforts of the applicants. Many people who would be directly affected by the proposals did not find out about them before the end of the consultation period. Awareness is still very patchy indeed: at least two of the houses situated closest to the line in the Logie area have been sold since SSE submitted their formal application, without the buyers hearing of the proposals until after they had taken possession of the property.
77. Stirling Before Pylons, the Friends of the Ochils, and the informal predecessor group known as the Dumyat Action Group, have all made substantial efforts to inform as many people as possible about the power line proposals, so that people could make their views known at the right time, to the right people, and participate appropriately in the democratic process. We did this through letters to the press, speaking at meetings, and by putting signs, posters and flyers at strategic locations.
78. We have also prepared a series of briefings, included relevant information on our websites, and given various interviews to the media. It would have been easy for SSE to do so many of these sorts of things, particularly as

they can expect to recoup their costs via consumers' electricity bills; it is deeply unsatisfactory that so much should be left to members of the public.

79. Our resources are nevertheless very limited, and much more needed to be done, to inform people about what was being planned, in time for their views to be heard. It was a particular concern of the Dumyat Action Group and the Friends of the Ochils that news of the proposals would not reach more than a tiny fraction of the many tens and even hundreds of thousands of people who use the popular Dumyat / Cocksburn Reservoir / Sheriffmuir area. Clackmannanshire Council's formal response to the proposals speaks of the "virtual population" of this area, whose catchment extends across half of Scotland, and beyond (see StBP / 4 / 10).

80. None of SSE's actions were aimed at this virtual population, other than the small minority who live in settlements close to the line. Indeed, there does not appear to be any recognition in the whole of the planning process that some hill areas have an importance that extends way beyond the immediate environs. Even with all the efforts made by the local groups, it was estimated (StBP / 4 / 10) that no more than about 8% of the people using the area in the course of 2004 would have seen any of the publicity in time to participate in the first two stages of the consultation process.

81. The numbers of people who did respond to the Scottish Executive's formal consultation needs to be seen in the light of these deficits – one can only speculate how many more objections would have been lodged, had all those who would be concerned about the proposals found out about them.

THE INTRINSICALLY EXCLUDING NATURE OF THE PLANNING PROCESS

82. Finally, in this precognition, I wish to put on record our deep concerns about the multitude of ways in which the whole system, through which applications like the Beaulieu – Denny upgrade get considered and decided, serve to exclude and marginalise participation by members of the public. Examples of this in relation to the process before the Public Inquiry was called include:

- Failure to actively bring details of what is being proposed to the notice of affected households and individuals. Such information needs to use Plain English and to spell out just what is being proposed in the local area, the possible consequences and the way that the system works, including the crucial requirement to take an interest at the early planning stages. So many people lack the understanding that the only time to have any impact on a crucial infrastructure decision is when it is being planned, outrage during its construction being too late.
- Failure to seek out the views of all potentially affected people, in ways that they can comfortably respond to. Allowing them to write in is greatly discriminatory – so many people just don't have the skills of organising their thoughts, putting them down on paper, and sending them in at the required time to the required body. There was much anger expressed at public meetings, when people who had taken the time and made the effort to come along and express their views in person were then told that no notice would be taken of them unless they put it all down in writing.
- Requiring people who had responded to one stage of "consultation" to write in again at the next and all subsequent stages. When systems are designed by people with a bureaucratic orientation, they may fail to realise how few people share that orientation and training.
- Imposition of rigid and obscure restrictions on when people are permitted to write in and have their views taken into account. The fact that more than 800 objections to the Scottish Executive's formal

consultation were ruled out of time bears witness to how obscure the time limits were.

83. In relation to the Public Inquiry, participation by the general public is made almost impossible as a consequence of many aspects of the process.

These include:

- Holding meetings about the Inquiry, and the Inquiry itself, during the working day. This rules out large numbers of people from taking even a peripheral interest in the proceedings. Requiring people to wait around perhaps for days to give evidence, when this means their having to make arrangements to take time off work, arrange for child care or care for others, etc, deters many more people.
- Requiring people, again, to register their interest formally in writing if they wished to participate, and then requiring all witnesses to provide written evidence, even though the guidelines indicate that verbal evidence is acceptable from third parties who are not acting as relevant persons to the Inquiry. This again discriminates heavily against those who are reluctant and less skilled writers.
- Communicating with interested parties principally by means of long, complex letters, expecting people to take in the information and act on it, even when a year has elapsed between the last communication and the need to take action. Very few people have the training to take in such complex information in this way, and it assumed a profound wish to participate in the Inquiry that people should remember, a year on, what they were required to do and when.
- Using a website to provide significant amounts of information ignores the fact that very many people – most of all those who are older – still do not use computers at all, let alone have constant access to the internet.

- Active participation in an Inquiry as a third party requires an extraordinary degree of determination and commitment, and a substantial amount of relatively rare skills to be able to contribute effectively. Very few people combine the determination and skills with the capacity to put such a large amount of time and effort into this process.
- With an Inquiry sitting for 9 months, the only people who can be expected to know what is going on are those who have been involved right the way through. Frequent reference is made to things that have been said or discussed at other sessions, but without explanation for the outsider. It goes without saying that almost no-one, outside the professionals who are participating as part of their work, has time and the resources to attend more than the occasional session.
- The conduct of the Inquiry is of course immensely formalised and professionalised. The language used is obscure and technical. The subjects under discussion are frequently arcane, or made to seem so by the professionals. This in itself is sufficient to deter most people from participating. Third party participants are often confused by the formalities, wrong-footed by applicants' legal teams, and put off or even intimidated by the unpleasantly adversarial nature of the process. Indeed, large numbers of people are deterred by the adversarial nature of the Inquiry from any sort of active participation.
- No guidance about the process or the content of the Inquiry is offered to the occasional visitor. No copies of precognitions are available. It would be surprising if observers of the Inquiry proceedings could make any sense at all out of it, for the large majority of the time.
- Providing no written record of proceedings, no summaries of what has been discussed, no "easy read" versions of anything, no Plain English guides to Inquiry procedures, further deter any but the most determined.

84. The above are just examples of the intrinsically excluding nature of the planning process for an issue such as this. In all the circumstances, it is perhaps astonishing that any third party ever gets involved to any significant degree.
85. It would be hard to think of ways in which the system could in fact be made more inaccessible, or more off-putting, to the vast majority of people.
86. This, surely, is not what is intended: people have a right to be heard and, moreover, the public have a huge amount to offer to the process, with all our local knowledge, and with our deep connections with the areas we live in and use. It is in the interests of the public, and therefore of governments, though not necessarily those of commercial developers, to find ways of informing all parts of the public, and of getting them involved much more deeply and much more constructively in the development and planning processes. Peter Pearson has more to say on this.
87. That Government aspires to harvest the wealth of community knowledge in the planning process is obvious from, for example, PAN 81 "Community Engagement: Planning with People", but this goes nowhere near far enough to put right the many deficits and barriers that we have encountered over the last 4 years.
88. This Inquiry is not the place to explore the limitations of the current system and the ways that might be remedied, but we will hope to engage with relevant parts of the Scottish Government and its administrators on this issue, once the Inquiry process is complete.
89. One last word. At the Pre-Inquiry meeting held in Inverness last year, I asked the Reporters how they would seek to balance the evidence put forward by the applicants and by third parties, when the resources available to each are so grossly imbalanced but do not reflect the relative

merits of the case each is making. While the question was acknowledged as valid, no answer was offered.

90. The extent of this imbalance has proved even greater than we anticipated. SSE expect (StBP / 1 / 18) to spend some £6.9 million, apparently on matters relating to this Inquiry. This is an extraordinarily large amount of money, but SSE clearly expect to recoup every penny from electricity consumers. No wonder they have been able to field such a large team of legals and expert witnesses, throughout this Inquiry.
91. We can only speculate whether there could be an element of the professionals seeking, consciously or unconsciously, to over-complicate - over-professionalise - some aspects of the case they are making. Should that be the case, it would be made easier by the ready availability of a very large budget.
92. At the other extreme, we have less than 1% of the applicants' budget to support us in confronting their case in this Inquiry, and it has had to be raised painstakingly, over a considerable period of time, through fund-raising events and appeals in the local area. MSPs in the recent debate on the Inquiry in the Scottish Parliament (StBP / 2 / 24) spoke of a "David and Goliath" situation, and that certainly applies here.
93. Our hope is that, with some well-aimed and well-chosen stones, we will be able to show up some of the vulnerabilities in SSE's case, notwithstanding their size and the extent of their elaborate defence of their case.