

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**

SUMMARY PRECOGNITION

Peter Pearson MRTPI

**Approach to Route Selection
in the Stirling Area**

APPROACH TO ROUTE SELECTION IN THE STIRLING AREA SUMMARY PRECOGNITION

1. My name is Peter Pearson, I have been a Member of the Royal Town Planning Institute since 1980, and I am Secretary of Stirling Before Pylons. Further details of my experience are found in my Full Precognition

2. Background
 - 2.1 This submission reviews how the application has approached alternative route options in the Stirling area, and the limitations of that process, including consultation. It will show how this has resulted in the unsatisfactory proposal now before the Inquiry. We will call for a full assessment of alternative options which have not been considered to date, such as undergrounding to the west of Stirling.

 - 2.2 It was established at the Strategic Session of the Inquiry in Mr Barlow's evidence that the applicants' decision to progress the upgrade of the line was taken in 1999 on the grounds of economy and efficiency. This decision did not take account of the environmental effects. It would also seem that undergrounding was dismissed at a very early stage. The main reason for this would appear to have been economic, without consideration of the potential environmental effects. The view taken was that environmental impacts were a second level decision to be dealt with in the ES. The combined Councils case covered these matters at the Strategic Session and they will not be repeated here.

 - 2.3 It is StBP's submission that these early decisions had far reaching consequences on how the applicants and their consultants dealt with the remainder of the routing and consultation process. In the case of the Ochils scarp in Stirling, where there is an accepted 'pinch point', which cannot be satisfactorily be resolved with an OHL, the overall routing could not be reviewed for environmental reasons. Had environmental reasons been considered at the initial stage, then it

seems logical that this may well have led to an alternate route being proposed. It also led the applicants to studiously ignore the potential benefits of undergrounding and the calls from the public, the councils and SNH to consider these options.

- 2.4 Although the applicants have eventually agreed to investigate undergrounding after enormous pressure, at the time of writing in October 2007, no reports or assessments are yet available to be considered for the Stirling area. The failure to address these issues in advance has wasted much of the Inquiries and objectors valuable time.

Consideration is then given to the following issues :

3. The North Yorkshire Inquiry findings
4. The Scoping Report Consultations (ALP 7/3)
5. The Proposed Beaulieu to Denny Consultation Document (ALP 7/1)
6. The Interim Report on Consultation and Selection of the Indicative Proposed Route (ALP 7/2)
7. The Final Report on Consultations (ES Vol 3, Appendix G)
8. Public Consultations
9. Professionalism and Consultation

This analysis leads to the following :

10. Concluding Remarks
 - 10.1 We would ask the Reporters to have in mind the criteria used by the Inspectors to the North Yorkshire Inquiry in reaching their conclusions.
 - 10.2 It has been demonstrated that the applicants reached the conclusion that an OHL from Beaulieu to Denny was required as early as 1999, and that the solution should be the most economic and efficient. This early decision before any environmental assessments had been carried out effectively drove the rest of the decision making process through the

consultation process, the preparation of the ES and the routing choices at every stage.

- 10.3 This process led the applicants to ignore the potential importance of undergrounding sensitive sections of the line. They steadfastly held to the outdated concept of oil filled cables until the beginning of the Inquiry process. When they belatedly accepted that XLPE was the preferred current method of undergrounding, it was effectively too late for them to change tack. It is quite clear that the applicants have not had an open mind in considering the potential for undergrounding sections of the line.
- 10.4 The applicants decided 'on balance' that the route to the east of Stirling, rather than that to the west was preferred for an over head line following the Consultation Document prepared by Gillespies. This report has been shown to be flawed with its omission of Stirling's Major Growth Area from its analysis. This evidence also identifies other failings in Gillespies report.
- 10.5 From the initial public consultation exercises the issues of routing east/west and the impacts on health, the Eastern Villages, the importance of the setting of the Wallace Monument, the recreational value of the Ochils and the Sherrifmuir battlesite have all been raised consistently by the public, politicians and the Council. They have not been adequately represented in the application.
- 10.6 The case is perhaps most eloquently put by George Reid in his letter of objection StBP/2/16 :

'Quality of Life

Ochil constituency is enriched by an environment of great landscape value and sites of national historic importance.

These qualities add immeasurably to the quality of life of local people and bring significant numbers of visitors from elsewhere in Scotland and abroad to the area, to the considerable benefit of the local economy.

The proposed route would have the following, seriously adverse consequences :

- The giant pylons are in close proximity to the Wallace Monument, and would ruin both the inward and outward views. I cannot think of any other country which would permit such a blight so close to a landmark which symbolises the right of the people to be a nation.
- The classic views from the esplanade and battlements of Stirling Castle would be ruined.
- The historic battlefields of Bannockburn, Sherrifmuir and Stirling Bridge – all major turning points in Scotland’s story – would be devalued.
- The old and new kirks at Logie, and their cemeteries would be degraded. So would Yellowcraig Woods if, as proposed a hundred metre wide roadway is cut through it.
- Dumyat and Sheriffmuir, great spaces open to all and in particular every weekend to hillwalkers, would likewise be devalued for all time.

I have argued these points with SHETL and SPT for the past eighteen months, without success. I cannot accept that ‘mitigation measures’ such as selecting the most ‘sensitive’ line of the proposed route can disguise irreparable damage to our environment and heritage.

The Scottish Executive has a duty to protect our environment and heritage both for the current population and future generations’.

- 10.7 None of the above have been satisfactorily addressed and in fact the points have been dismissed through single line bullet points in the various Reports on Consultation and Route Selection. The Council is

quite right to add its view that the alternative route options around Stirling have not been fully and properly considered.

- 10.8 The applicants have failed to give due weight to the level of public objection to the proposals. It is commonly felt that the applicants had pre-judged matters and were just going through the motions of the consultation exercise to satisfy the requirements of the ES.
- 10.9 As responsible companies SHETL and SPT could have gained significant public credit, by responding to public opinion, and pursuing the underground options and promoting proposals which would enhance the environment around Stirling's historic heritage. They could also place themselves at the forefront of undergrounding technology as a result, *and* have achieved significant public kudos as a result. Indeed it may not be too late for them to reconsider their position. Such a solution could see a real reduction in wirescape in the Stirling area with the removal of the existing line. However, one can well anticipate the negative publicity which will result for the power companies and Stirling following the implementation of the current proposals. The next issue of tourist guides, which have been very positive about the Stirlings heritage will almost certainly reflect the criticisms made by the public and George Reid in para 8.5 above.
- 10.10 Should the underground option through Stirling be agreed, then there would be enormous benefits to the area gained by the removal of the the existing line to the east of Stirling and improvements to those 'degraded' areas. No assessment of these benefits has been made by the applicants, but it should have been an essential part of a full cost benefit analysis presented as part of the application.

10.11 We ask the Reporters to find :

- That the alternative options underground and overground to the east and west of Stirling have not been fully examined by the applicants.
- That there is not an acceptable overhead route to the east or west of Stirling, and
- That there is not an acceptable underground route to the east of Stirling.
- That an independent assessment of the potential for an underground route to the west of Stirling should be carried out. This should be carried out at the applicants' cost as they have proved themselves incapable of dealing with this matter objectively.

Should there not be a viable route to the west of Stirling or should it and other necessary sections of undergrounding along the route prove prohibitively expensive, then the Scottish Government should be advised to revisit the options for undersea cable routes down the east coast. We recall from the Strategic Session that the applicants' own evidence indicated that where significant sections undergrounding required, the undersea option would become a viable alternative.

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