

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 and Southern Energy's proposals for the
Beauly to Denny 400KV Steel Tower Double Circuit
Overhead Electricity Transmission Line**

PRECOGNITION

PETER PEARSON, MRTPI

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

ALTERNATIVE ROUTES INCLUDING UNDERGROUNDING

1. Personal Background and Relevant Experience

- 1.1 My name is Peter Pearson and I am Secretary of Stirling Before Pylons.
- 1.2 I have been a Chartered Town Planner since 1980, and have over thirty years experience in the fields of Renewal and Regeneration.
- 1.3 I was a founding member of the Renewal Strategy Team of Leicester City Council, where I managed three local area offices for 7 years. This innovative area based, community strategy is still in operation 30 years later.
- 1.4 Since then I have been the Director/Senior Officer of three Housing Associations in Scotland for 17 years. I was the first Director of Lorne Area HA in Leith, in which time they received the UK Community Development Foundation Award for Partnership for 'a series of exciting and innovative changes in what was once said to be the worst street in Scotland'. This was followed by being founding Director of Wellhouse Housing Association in Easterhouse and managing the largest development programme in Glasgow at that time. Latterly, I worked for Rural Stirling HA and implemented their 'New Housing Partnership' programme in the pressured rural area.
- 1.5 Since 2003 I have been an independent Housing & Planning Consultant working with Universities, Local Authorities and RSL's. I was invited to deliver the postgraduate and professional 'Sustainability and Development Course', which covers planning and the development process, for the Housing Policy and Practice Unit at the University of Stirling from 2003-2006. This year I presented the 'Renewal and Regeneration Course', which covers community engagement and social inclusion, on the same course and will do so again in 2008. In addition, I delivered the 'Sustainability and Community Development

Course' to postgraduate and professional students at the Department of Urban Studies at the University of Glasgow in 2005/06. I also wrote a distance learning course on the 'Development Process' for the School of the Built Environment at Heriot-Watt University in 2005.

- 1.6 During my career I have had extensive experience of feasibility studies, option appraisals and business planning in relation to major regeneration programmes.
- 1.7 In a voluntary capacity I am a Committee Member and Chair of the Development Working Group at Rural Stirling Housing Association and Board Member and Treasurer of the Rural Housing Service. I am also a volunteer Advisor with Planning Aid for Scotland and member of the Scottish Federation of Housing Associations 'Planning System Advisory Group'.
- 1.8 In 2006 Scotland on Sunday included me in their 'Power 100' a review of the most powerful/influential people in Scotland, for my role in the Beaulay to Denny Power Line Campaign. I have been a member of Friends of the Earth, Greenpeace or the John Muir Trust for over 30 years and am committed to sustainability and renewable energy.

2 Stirling Before Pylons

Stirling Before Pylons is a community group formed in response to the proposals for the Beaulay to Denny powerline. The groups constitution (StBP/2/2) outlines the following objectives :

1. To question the need for the powerline and look at alternative options and routes
2. To minimise the impact of any route on the historical, landscape and natural heritage of the area
3. To minimise the potential health impacts of any route on residents
4. To offer support for the protection of similar areas in other parts of Scotland

5. To communicate as necessary with outside individuals and bodies in the furtherance of the said objectives

Membership is open to all who support these objectives and currently stands at around 900. Attendance at social fundraising events has numbered 200.

In November 2006 Stirling Before Pylons became a Company Limited by Guarantee (No SC312571). We are currently considering becoming a charity and have had our objectives approved by the Office of the Scottish Charities Regulator.

3. Background

- 3.1 This submission will review 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.
- 3.2 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.
- 3.3 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 to me 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.

- 3.4 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.

4. North Yorkshire Inquiry Findings

The North Yorkshire Inquiry is the most relevant precedent to this application. In the section on 'Routing Principles and Policies' the Inspectors came to general conclusions after considering the material points (APL 2B/2). The following appear relevant to the current application in Stirling :

- 'given the scale and nature of the development which the guidelines address and the huge number of interests affected by each proposal, a broader base of consultation with relevant outside bodies would in our view have given greater authority to the findings of the review of the Holford Rules.' para 7.43.
- 'The importance attached to the relevant landscape is a matter of judgement in each case, bearing in mind the inherent quality, the added weight of any statutory designations and the presence of local factors.' para 7.45.

- ‘Two specific criticisms we find valid. First, it seems right to us that consideration should be given to the number of people affected by a proposed route, whether at home, at work, at leisure or in transit. This would sensibly differentiate between two comparable routes.’ para 7.46
- ‘Second, more explicit consideration should be given in the rules themselves to the impact of new overhead lines on proposed developments. This would include both sites where planning permission or other appropriate consent has been granted for specific developments or sites allocated for development in emerging or approved development plans.’ para 7.47
- ‘We accept the view that the existing 400kV line appears to generally adhere to the Holford Rules, but it is nonetheless highly intrusive in places. This lends some weight to the argument that the Rules are less effective in dealing with higher quality landscapes.’ para 7.48
- ‘The question of undergrounding raises a number of complex matters and **it is unreasonable to expect objectors to have formulated alternative policies since it is unlikely they would have access to the necessary technical information or the resources to carry out a policy review.**’ para 7.49 (emphasis added)
- ‘In the interest of consistency, it seems essential that standard criteria be established to identify situations where, as a matter of routine, undergrounding will be considered. However, these criteria should not be so rigid as to prevent consideration of undergrounding in areas of special local importance. It is evident that there are areas, which do not fall within NGC’s definition of an environmentally constrained area, in which undergrounding could be justified. These include areas of special local importance in landscape terms which are enjoyed by large numbers of people, and areas containing other features such as listed

buildings on conservation areas. There would undoubtedly be problems of consistency appraising such individual areas on a national scale. Nevertheless in our view the special circumstances of each case should be considered on its merits.' para 7.50

- 'In our view the extremely high cost and other disadvantages of undergrounding preclude its general use and must be weighed in the balance against visual and environmental advantages in each individual case.' para 7.51

All the above seem to be sensible and relevant guidelines for the applicants to comply with in relation to the proposed line through the Stirling area. **It is our submission that the proposal does not satisfactorily comply with them.** In particular the applicants' approach to undergrounding seems to be at odds with the view recorded here. It also has to be remembered that these findings related to oil cooled pipelines not XLPE. We would particularly wish to draw the Reporters' attention to para 7.49 and the rejection of the view that objectors should be expected to identify alternative route options; we wholeheartedly concur with the Inspectors' conclusions.

5. Scoping Report Consultations

- 5.1 The applicants produced their Scoping Report for the ES (APL 7/3) in July 2004. There were a number of relevant comments made by the consultees on this document in relation to routing, undergrounding and impacts which are relevant to the Stirling area. It is StBP's position that the points raised in the following paragraphs, which were identified as early as 2004 have not received sufficient attention in the ES and the application that has been developed in line with it.

In addition, the Scoping Report would not appear to have been updated to take account of these comments of the statutory consultees. There is thus not one document that can be referred to in relation to the requirements for the ES for the power line. This appears to be a significant oversight in the preparation of the ES.

5.2 **Scottish Executive** (Document 7/9)

- **Cultural Heritage** (para 2.8)

‘The proposed development will have significant impact on scheduled Ancient Monuments, listed buildings and designed landscapes. This could involve direct impacts on these sites and on their **setting**.’

- **Undergrounding** (para 4.170)

‘The question of undergrounding requires to be addressed. This section should cover :

1. The approach adopted by the applicants to the issue of undergrounding
2. The potential benefits of undergrounding either in selected localities or more generally
3. The environmental impacts of undergrounding

- **Braco to Denny**

‘Important issues in this section include the proximity of the proposed line to communities in the Stirling, Clackmannanshire and Denny area.

The cultural heritage issues include impacts on Braco Castle, the site of the Sheriffmuir Battle, the Wallace Monument, Stirling Castle and Manor Powis.’

5.3 Clackmannanshire Council (Document 7/9)

- **Proposed Route from Braco to near Denny**

‘We would wish to raise our fundamental concern that neither in the published Scoping Report, Interim Report on Consultation nor in any other document has a case been argued for the proposed route from Braco to near Denny eastward of Stirling as against an obvious alternative route running westward of Stirling.

We believe that this omission must be addressed by the developer if a meaningful and open debate is to be progressed on the relative social, economic and environmental benefits and dis-benefits of all available routes for the transmission line from Braco to Denny.

We do not regard it as acceptable that it is not currently proposed that the ES should argue the relative merits and de-merits of the alternative west or east of Stirling routes.

Therefore, although the following comments relate to the proposed east of Stirling route only, if a debate is opened to allow consideration of a west of Stirling route, which is an obvious alternative to the currently proposed route, we are likely to have further comments to make relating to the desirability of a west of Stirling route from our perspective.’

- **Design**

‘The route from Braco to near Denny, as currently proposed, crosses the Carse of Forth, running down the dramatic Ochils escarpment across the contrastingly flat carselands of the Forth to Manor Powis. All aspects of the design of this project are of the greatest importance if any negative impact of this project on the ‘iconic’ views to and from

historic Stirling to the Ochils and the Clackmannanshire heartland is to be minimised’.

- **Undergrounding**

‘We concur with the Scottish Executive’s views and particularly wish the ES to debate the benefits and dis-benefits of undergrounding the transmission line as it enters on to and crosses the Forth carseland’.

5.4 **Stirling Council** (Document 7/9)

- ‘It is clear from local consultation exercises that residents and other parties will look for full justification for not undergrounding parts of the transmission line in the Stirling area’ (para 4.17)
- ‘At para 1.2.1.7 the area north and east of Stirling is not listed as one of the areas having ‘alternative route options which are still under consideration’. While the ‘indicative proposed route’ east of Stirling takes account of representations from Stirling Council it is unlikely to be universally welcomed, and local residents and other interested parties here (and in the vicinity of Kinbuck) will wish to see a clear explanation of all other route options that have been examined in this vicinity (including to the west of Stirling) and the reasons for deciding upon the chosen line (including the weight accorded to public consultation responses).’
- ‘In the Stirling Council area the obvious issue of high significance is the route selection process and the determining environmental criteria and the weightings attached to them in that process. This potentially affects planned new development as well as existing communities and heritage features’

- ‘Given the proximity of the indicative route to a number of communities and individual dwellings and other occupied buildings, the health and safety factors may assume high significance if it emerges that there is any health risk attached to electro-magnetic emissions’.

6. Proposed Beaulay to Denny Consultation Document (ALP7/1)

6.1 This report was produced by Gillespies LLP in January 2004. It was the first formal documentation available to the public and identified two route options from Braco to Denny : d1 to the west of Stirling and d2 to the east.

6.2 The Report draws attention to the following from the Structure Plan :

- The strategic vision seeks to enhance the quality of life and improve economic prosperity in the context of caring for the environment (para 4.83.39)
- The rich cultural and natural heritage of the area is a key asset ... particularly with regards to tourism.At locally designated sites, development will only be permitted where there are no significant adverse impacts. (para 4.83.40)
- Stirling and Clackmannanshire has a significant number of cultural heritage sites which are of national importance including, Stirling Castle complex and the Wallace Monument. There will be a presumption against development which will adversely affect the structure or setting of areas of cultural heritage, particularly SAMs.’

Further clarification is provided from the Local Plan :

- Tourism is an important sector of the local economy. It is therefore important to preserve the architectural and landscape

quality of the area. There will be a general presumption against developments which would have an adverse impact on SAMs and their settings and other unscheduled remains where appropriate. The plan also promotes the conservation of Historic Gardens and Designated Landscapes and there will be a presumption against development that may adversely affect these sites. (para 4.83.45)

- General policies are designed to protect a range of local designations including Areas of Great Landscape Value ... and development will not normally be permitted where it would have a significant adverse affect (para 4.83.46)

6.3 The Gillespies Report devoted a page of text and three pages of bullet points to the route options around Stirling. The analysis had a basic methodology comparing the following outline factual data: technical considerations, settlements, nature conservation issues, landscape designations, landscape character, visual issues, cultural heritage designations, recreation and tourism, infrastructure, agriculture, forestry and effects on the system. This must be seen as more rigorous than in the future consultation documents which did not attempt such an objective assessment.

6.4 Unfortunately, Gillespies' assessments had a number of omissions and mistakes which compromise their value in such important decision making :

Route D1 to the West

1. Technical considerations : fails to mention River Forth, although it does so in relation to D2.
2. Identifies passing through 2.130km of ancient semi-natural woodland, although this would appear not to be necessary from the map
3. Cultural heritage : fails to mention impacts on Stirling Castle

Route D2 to the East

1. Technical considerations : mentions crossing River Forth. Identifies the issue of coming down the Ochils scarp as 'fairly easy'. Although this is possibly the steepest slope along the whole power line route. There appears to be no technical assessment to back this conclusion up.
2. Settlements ; it completely fails to mention the proposed Major Growth Area planned by Stirling Council. This a major omission, which casts doubts on the authors' thoroughness and competence. To overcome this omission the route needs to be significantly adjusted affecting more people, over a longer route and presumably with more angle towers.
3. Fails to identify the Firth of Forth SPA as an issue, although it is referred to earlier in the document.
4. Fails to mention passing adjacent to the Airthrey Castle HGDL.
5. Cultural Heritage Designations : fails to mention Stirling Castle and Wallace Monument settings. The methodology allows no mention of the Sherrifmuir battle site.
6. Recreation and Tourism : makes no mention of the Ochils, Dumyat, Wallace Monument and Stirling Castle.

6.5 The section concludes (para 6.113.1) :

'Dunblane and Stirling dominate the choice of route. Option d2, which passes to the east has a distinct pinch-point where it crosses the scarp of the Ochils above Stirling University and clearly visible from the Wallace Monument. It also raises issues where it is very visible as part of a developing wirescape on the outskirts of Bannockburn.

Option d1, however, is more directly visible over longer lengths, particularly at Strathallan, past the village of Kinbuck and where it crosses the open valley of the Forth, parallel to the M9 and clearly

visible from Stirling. On balance, these issues of visibility, together with the effect on the more rural landscape west of Stirling lead to a rejection of route option d1.'

- 6.6 This conclusion is one reached 'on balance' and obviously fails to take account of the points made in para 4.4 above, where the issues related to route d1 are clearly underestimated. In addition to the points mentioned, no account is taken of the potential health impacts on the much more populated route to the east or the impacts on the regeneration of the Eastern Villages. Nor is any account taken of the potential for undergrounding sections or all of these routes. It also seems to place undue emphasis on the impact of the route on road users, as opposed to residents and visitors to Stirling.
- 6.7 This flawed recommendation is important because the applicants never adequately revisit it in the later stages of consultation or route selection process. For a decision reached 'on balance', in my opinion they should have compared d1 to d2 again after the next stage of consultations, in a thorough way. Although they do so at the Final Consultation Stage, the criteria for this were restricted to the impact on the Eastern Villages. It makes no difference to me that the applicants dismissed Gillespies and hired another landscape consultant for the inquiry. The comparison should have been carried out.
- 6.8 In summary, it is essential that with any conclusion reached 'on balance' that all the essential factors are considered and that they are all given due weight. Failure to do so renders the decision reached flawed. In our submission that has been the case throughout this process.
- 6.9 Having considered the evidence at this stage, StBP concluded that there was probably not an acceptable overhead route to the east or west of Stirling. This is the view also reached by SNH in due course.

7. Interim Report on Consultations and Selection of the Indicative Proposed Route (ALP 7/2)

- 7.1 This report produced in June 2004 proposes a number of significant local changes to the eastern route through Stirling. Unfortunately the approach again has a number of flaws, whilst it takes account of the comments made in the Consultation Document, it makes little detailed assessment of the negative aspects of the new Indicative Proposed Route. There is certainly no systematic balancing of the pluses and minuses' of the options presented, rather a general description of the new route and how that overcomes the difficulties identified in the previous consultation process. There is thus a clear change from the Consultation Document Methodology, which receives no explanation. No attempt is made in advance to consult the new communities which will be affected by the new proposals. Almost inevitably, therefore, this approach led to as many dissatisfied residents as did the original Consultation Document. This approach to decision making by developers is commonly known as 'divide and rule'.
- 7.2 This review led to a significant number of proposed alterations to the Eastern Route, which when added together can be regarded as significant. There was, however, only a minimal attempt to assess this effectively new proposal/route with the western route which had only been rejected on balance. The comparison merits three lines (para 3.6.5.5) and only refers to the Major Growth Area as a significant difference from the original proposals. This is hardly a convincing analysis.

We will now look at these amendments in more detail. These should be judged against the basic requirement to '**cause the least disturbance to the environment and the people who live, work and take recreation within it**'. See Mr. Turnbull's precognition at the Strategy Session (para 10.4.1 and elsewhere).

7.3 Braco, Strathallan and Sheriffmuir

The consultation exercise leads the applicants to identify the key issues in this area as :

- Potential effects on the South Tayside Goose Roosts
- Visibility in the open landscape of Strathallan

As a result the route is moved away from Braco and nearer to Kinbuck and Cromlix House. The route appraisal description refers to an impact on 'half a dozen individual houses' but makes no reference to Kinbuck village, which will be making its own representations to this Inquiry session. Cromlix House, a high quality facility, identified as the equal best 'Hotel and Restaurant in Central Scotland' by 'Scotland the Best' Peter Irvine 2005 is not even mentioned, although the new route now runs adjacent to it.

Likewise there is no assessment of the impacts of the various routes on the Sheriffmuir battlesite or the Ochils AGLV and its associated recreational use.

There is a worrying concern that the applicants rather than carrying out an objective assessment, highlight the advantages of their own preferred proposal, but fail to draw attention to its limitations. This issue is highlighted by the failure to have adopted a methodology which draws attention the both the strengths and weaknesses of the options.

7.4 Blairlogie/Powis

Keys issues identified here are :

- Visibility of the crossing of the Ochils from the Wallace Monument and the potential effects on the setting of the monument
- Proximity to houses

Two routes are proposed here running through the centre of Yellowcraig Wood following 'further technical study'. No further information is supplied on this technical study. In addition, no reference is made to the original route in the Consultation Document or why it has been dismissed without reason. There is no analysis comparing the new routes and the original proposed route. This seems particularly surprising given that all routes down the Ochils are seen as particularly sensitive and contentious.

The new proposed routes :

- Diverts the route almost over Broomhill (probably the nearest house to the whole route of the powerline), and near houses in Logie, Logie Villa and Powis Mains.
- Impacts directly on the private water supplies of Broomhill and Logie
- Brings the route nearer the University Hall of Residence
- Impacts on 9 Grade B Listed Buildings at the foot of the Ochils and the Aithrey Castle HGDL.
- Goes directly through the centre of Yellowcraigs Ancient Woodland, creating an 80m swathe, which will frame the powerline and draw attention to it from the Wallace Monument.
- Is much nearer to Logie Kirk

Clearly this does not satisfy the key objectives above and needs much fuller analysis, given the sensitivity of these locations. StBP agrees with SNH that there is not a satisfactory route down the Ochils scarp in this location and the analysis completely fails to assess the potential impacts of the revised proposals.

7.5 **Stirling to Denny**

This section crosses the carse and then passes the Eastern Villages to Denny. Although the document identifies 4 potential routes, two of these effectively pass through/adjacent to Stirling's Major Growth area and are not therefore acceptable. The other routes pass to the east or west of Fallin and then join in a circuit past the other Eastern Villages (Cowie and Plean) to Denny Sub Station.

The key issues for routing are identified as :

- Proximity to settlements and the Major Growth Area
- Potential effect on the River Forth bird population
- Visibility in the open landscape of the carse
- Wirescape approaches to Denny substation

There is no mention of the importance of the regeneration of the Eastern Villages. Both the routes referred to are significantly less direct than the proposal in the Consultation Document; moreover there appears to be no mention of the increased length of the line, nor the increased number of angle towers that will presumably be required.

The routing section concludes : 'The orange and yellow routes avoid the two Major Growth Area options. The orange route would have a lesser effect on people but, taking into account the national and

international designations and the protection of the bird population of the Forth, the yellow route can be considered as having the lesser effect overall' (para 4.5.1.9).

This is hardly a conclusion which is likely to meet with the approval of the residents of the Eastern Villages. An alternative assessment could have concluded there is not an acceptable route to the east, or at the very least that this required a review of the options to the west of Stirling. It certainly confirms the view made many times by members of the public in the Stirling area that this process has given birds priority over people.

8. Final Report on Consultations (ES Volume 3 Appendix G)

- 8.1 This report includes a review of the routes to the East and West of Stirling, on the basis of concerns about the Eastern Villages raised in the consultation exercise. No other reasons are acknowledged for carrying out this review of the Indicative Preferred Route (para 3.4.4.7), despite the wide ranging objections referred to elsewhere.
- 8.2 The routing east or west of Stirling is a vitally important subject, given the calls by the public, politicians the Council and SNH, but unfortunately consists of little more than a page, mainly of bullet points. This cannot be seen as an appropriate degree of attention given the massive amount of documentation laid before the Inquiry by the applicants.
- 8.3 In addition, this analysis cannot be described as being objective, using language which consistently downplays the landscape and features to the east and the proposed routes impacts, whilst emphasising the effects the route would have to the west (see my highlighted terminology in the table below). This analysis thus deserves detailed

scrutiny and is replicated in full below. I have prepared the table to allow easy comparison, as the format in the report is less accessible.

Issues : Route to West	Issues : Route to East	StBP Comments
Potential adverse landscape effects on the high quality rural landscape west of Stirling	Potential further damage to the already degraded landscape around the former mining villages east of Stirling	The mining villages only form a small section of the eastern route, the remainder is rural, and part an AGLV. There is no mention of Ochils scarp which SNH say is 'one of the most visually sensitive areas in Scotland'
Potential adverse landscape effects on the setting of the city of Stirling	Potential landscape effects on the setting of the city of Stirling	Is there a qualitative difference here ?
Potential adverse visual effects on the classic views from the west to the castle and the Wallace Monument, set against the backdrop of the Ochil Hills	Potential visual effects on views of the Wallace Monument from the approaches from Tullibody and the east	The Ochils are mentioned as an advantage to the west, when they will actually be damaged themselves by the eastern route. The iconic views from the Castle and Monument to the east are ignored
Potential major adverse visual effects on residential properties in the area to the west of Stirling	Potential major adverse effects on the settlements of Fallin, Cowie and Plean, though some of these views already include overhead power lines	No attempt is made to quantify the number of houses affected. Neither is reference made to the Eastern Villages regeneration status.
The route would pass through 8.5km of the designated AGLV of the Touch Hills	The route would pass through 6km of the Ochil Hills AGLV, on the line of the existing route	No reference to relative quality of AGLV's. Are the Touch Hills as sensitive as the Ochils scarp ? How many people use each area ?
The route would pass close to two HGDL's	The route would pass close to one HGDL	No assessment of the relative impacts is made
The route would have the potential to affect some 6 Ancient Monuments in the Touch Hills	The route would have the potential to affect 3 Ancient Monuments	Again no relative assessment. How does the National Wallace Monument compare to the others ?
There would be fewer adverse effects on areas of prime agricultural land than the route to the east		Where the eastern route has a clear advantage, it is not mentioned
There would be a greater clearance of woodland in the area to the west, including 24.4 ha of Ancient Woodland	Less woodland clearance would be required, with only 2.3 ha of Ancient Woodland	The 24.4 figure must be the whole wooded area, a glance at the map shows far less would need to be felled. Again no assessment of the importance is made. Yellowcraig Woodland as the backdrop to the iconic view of the Wallace Monument

This analysis is not intended to be definitive, but rather to draw attention to the limitations of the work which has been carried out in assessing the options to east and west. It is StBP's view that the subject requires much further detailed and objective work before a valid assessment can be made. This requires qualitative assessment as well as quantitative.

For instance, the simple measure of number of Ancient Monuments affected is insufficient at this level of analysis. In the above table a single standing stone on Sheriffmuir is given as much importance as the National Wallace Monument, whilst the Battle of Sheriffmuir, a potential turning point in British history receives no attention at all.

It is my opinion, having listened to significant sections of the Inquiry, that this sort of methodology and analysis of the options appraisals, is common to large sections of the applicants' proposal. It seems to me to be a major weakness and an issue that the Reporters should give weight to when they reach their conclusions on the application and formulate their recommendations to Scottish Ministers.

- 8.4 The assessment (para 3.4.4.9) then refers to SNH's Landscape Character Assessment and the industrial legacy to the east, before stating that both sides of Stirling need to be treated carefully due to the settings of the Castle and the Wallace Monument.

However, it totally fails to mention important positive references to the Ochils in the Central Region Landscape Character Assessment (Section K Volume 2 Document 13 pp 94-95) which makes the following comments :

- The visual impact of the escarpment is accentuated by the flat floodplain, giving a landscape experience which is unique in Scotland.
- Location and topography combine to make the Ochils, particularly the south facing slopes, one of the most visually sensitive areas in Scotland.
- Proximity of the western end of the range to dense population concentration encourages intensive recreational use

Unfortunately, one is forced to conclude that the authors have chosen the information that suits their pre-determined position rather than presenting all the available information and reaching a balanced view on the data.

8.5 There is also no mention of Braes of Doune Windfarm, this has clearly made a major impact on the setting to the west of Stirling. It is characteristic of the approach that this major development has not been introduced in the latter stages of the analysis. The views to the west from the castle can no longer be considered in the same way that they would be without the windfarm and its impact can be considered nothing less than controversial. It clearly has to be weighed in the balance in any consideration of routes to the east and west of Stirling.

8.6 The section concludes :

‘The conclusion was that the more developed and industrialised landscape east of Stirling had more capacity to absorb change than the more rural undeveloped landscapes west of the city. In addition, that the carse lands to the west are more critical to the setting of the city than those on the east. The higher quality views from the Wallace Monument and the Castle are concentrated on the west side, whilst those on the east are generally degraded by existing development including overhead transmission lines. These issues were considered to outweigh the potential effects of introducing a new overhead transmission line into the landscape around the former mining villages.’

It is StB's view that this cannot be accepted as an objective assessment of the merits of the options to the east and west of Stirling. The evidence brought by StBP to this section of the Inquiry will question virtually every aspect of the above conclusion. We consider that the whole setting is of sufficient importance to preclude the construction of the powerline to the east or the west. The failure by the applicants to give serious consideration to an underground route has been a major failing in these circumstances, and puts the Reporters in a very difficult position.

- 8.7 It is unfortunate that no comprehensive cost benefit analysis of the alternative options in Stirling has been carried out. The only such analysis at the Strategic Session was a cost analysis, without an assessment of the environmental benefits and dis-benefits of the proposal. StBP's will be bringing some information on tourism and electricity costs to this section of the Inquiry, but a full assessment should have been a basic part of the application.

9. Public Consultations

- 9.1 Public Consultation in the development process has been a major aspect of my professional career over the last thirty years. I have probably averaged a consultation/community meeting of some form every other week over that period. This has ranged from small scale projects to multi-million pound regeneration programmes. Unfortunately, I was not able to cross examine Dr. Keith MacLean at the Strategy Session on this subject as I was committed to a full days presentation on consultation in the development process to postgraduate students at the University of Stirling. This part of my evidence will focus on the consultation process in the Stirling area.

- 9.2 I was surprised to see that SHETL had not appointed professional consultants to carry out or advise on the public consultation exercise. It appears to be the one area where they have relied on in house staff, Dr MacLean and Mr Young, neither of whom had significant experience in the field. It is accepted SHETL took on ERM consultants to carry out an external assurance review. However, this review was clearly limited as it makes no reference to the dissatisfaction by the public, councillors and MSPs with the approach adopted. Had ERM attended any of the public meetings or consulted the public on their view of the process they would have received a very different response, to the conclusions that they reached.
- 9.3 The essence of effective public consultation is that the proposals have to be presented in an objective open manner, clearly outlining the benefits and dis-benefits. All those affected have to be informed and advised objectively of the implications for them. Points of concern have to be addressed and when new information becomes available it has to be taken on board. The reasons for the final decisions made have to be clear and transparent if the public are to have confidence in the system. Failure to follow this approach will result in the public not trusting the decision making process, which, unfortunately, is the situation we now find ourselves in at this public inquiry.
- 9.4 The first I heard about the proposals was from a friend telephoning to say a meeting was being held in Bridge of Allan on 24th February 2004. When I attended at 7pm the event was closing down and I was told the closing date for submissions on the 150 page document, which was not available, was 19th March 2004. The following day when I telephoned SSE for more details I was informed the applicants had no responsibilities to provide further information, as it was not passing through my land, although it was less than 500m from my house. This type of unsatisfactory response has been repeated many times and people have found the applicants distant and most unhelpful.

- 9.5 It was clear that Stirling Councillors and MSPs had been briefed by the applicants in advance of the consultation exercises. Initial responses from politicians all met with the same response that the power line was required and had to proceed as a matter of urgency.

This was George Reid MSP for Ochil's initial position, but to his credit it changed significantly as his frustration with the consultation process grew. Given his position as Presiding Officer, he was restricted in making public statements, but he made an exception in relation to this proposal. In his letter of objection of the 9th December 2005 (StBP2/16), he said :

- 'Over the last 18 months, in consultation with community groups, I have attempted to address the serious issues arising from the line with senior representatives of both companies. I have done so in written submissions, in face-to-face meetings and through on-site inspections. Over this period my staff and I have responded to over 2000 letters from local people who have contacted us about their concerns. It is clear to me that their concerns have not been adequately answered
- 'One of the fundamental principles of our new democratic structures in Scotland is Participation – the right of the citizens to have a voice in decisions which affect them and future generations.'
- 'Attempts to engage the power companies over the past eighteen months in discussion of Underground and Undersea routing, of underground Direct Current, and trenching alongside main roads have all been rapidly dismissed on the grounds of cost, environmental degradation and technical difficulty.

If Scotland is to get its energy supply right, however, such rapid

rebuttals should be tested by independent experts who are prepared to think out of the box and over the horizon.'

If this is the experience of one of Scotland's senior politicians, it can easily be imagined how ordinary members of the public felt, who had no knowledge of the detailed and complex processes involved.

- 9.6 It is unfortunate that at the various public meetings the applicants didn't make a written public record or attendance record, as is accepted good practice. The only such record publicly available is that of the public meeting called by Stirling Council on the 1st April 2004 (StBP/2/6).

At the Public Meeting fundamental issues were raised, and similar points were raised at other meetings that I attended :

- Health : the issue of EMFs for the most populated part of the whole route through Stirling was highlighted. Unfortunately Dr MacLean's understanding of these issues was limited and did not develop in line with the public's growing understanding through the consultation process, and as a result the applicants lost public credibility.
- Alternative Options and Undergrounding :
 1. The issues in relation the Eastern Villages were raised, but never addressed to the communities satisfaction.
 2. Undergrounding :

This was suggested and it was said 'cost was not the main issue'.

A range of issues were raised by SHETL in relation to outdated oil filled cables, and they maintained these arguments until the summer of 2006 where they were repeated in the 'Underground/Overground' TV programme; although the public were fully aware of XLPE cabling as the accepted method of undergrounding well in advance of this from research on the internet. This created the impression of an organisation which were either out of touch and out of date with its own industry standards or who were not being frank with the public.

It was stated for legal reasons electricity cables could not be placed too close to oil and gas pipelines. Recent studies have referred to underground cables going over or below other such pipelines.

'It was suggested that there was also an alternative route to the west of Stirling where it would be possible to route the line underground and which would avoid populated areas. If this was possible and the costs were not prohibitive it was suggested that this might be the solution'. To date no such study is available.

It was stated underground sections were being considered for critical sections. No such details were provided until after this Inquiry started and none are available at the time of writing for the Stirling area.

It was stated that if 'all of the representations received showed a general preference for a change of route then the Companies would work on this'. No such work has yet appeared, unless they literally did mean 'all' representations.

- Consultation Process

1. The consensus was that the consultation period was wholly inadequate. It was also confirmed that the timetable was not fixed. It was clear, however, to anyone with knowledge of the development process that the public timetables were impossibly optimistic.
2. It was suggested that there was an obligation to leaflet everyone affected by the proposals. This was raised at all meetings I attended and is a basic issue of good practice. It would be perfectly easy using GIS technology. No such publicity has yet been circulated.
3. The applicants were asked to make the decisions on the preferred route accessible and explain their rationale. This is an area where the applicants are criticised by ERM for failing to make their decision making process clear and transparent.

It is a criticism that could be equally made of all the documentation for the application and ES, none of it could be described as user friendly or easy to follow. Indeed it would have been very easy for the applicants to produce regular newsletters or information sheets that summarised the impacts of the application in particular locations. These matters are common and seen as basic good practice in the field. In the event Stirling Before Pylons felt compelled to produce a series of Briefing Notes to answer the range and number of queries we were receiving from concerned residents who could not gain satisfaction from the applicants.

- 9.7 Other background to the consultation exercise can be gained from the local press articles included as Document StBP/4/7, which is only a small selection of those available. There is a concentration here on the regular series of local MSPs articles, as these could be considered to provide a balanced and independent view on matters.

9.8 Much greater detail could be provided on the shortcomings of the consultation process, but the preceding paragraphs provide a flavour of the concerns. As has been well documented the outcome of this consultation exercise was 17,000 objections, understood to be the largest number ever relating to one development in Scotland, with approximately 4,000 from the Stirling area. The unanimous all-party objection from Stirling Council, an unprecedented letter of objection from 10 Community Councils, together with SNH identifying Stirling as one of its two principal concerns along the whole route can be added to this. We also heard at the Strategic Session how the applicants failed to respond to offers from the Councils to meet in order to try and resolve matters.

At the Strategic Session Dr MacLean applied a large amount of spin and presented the consultation as a case of good practice. I am afraid this rang rather hollow to members of the public who had tried to participate in the process. From my perspective of thirty years experience in the field, I cannot think of an exercise in public consultation that has been more ineffective. The transformation of the support from politicians and public bodies at the outset to objection by these bodies and the public at the conclusion is, I would suggest unprecedented and an indication that there is something far wrong with the process. I anticipate that the consultation process may be subject to detailed research into how a consultation exercise can go so badly wrong after this Inquiry has concluded, in order that such fundamental mistakes are not repeated in the future.

10. Professionalism and Consultation

During the course of this Inquiry the applicants have made much of the importance of professionals, and implied that the views of non-

professionals should carry little weight by comparison. I wish to challenge this position in relation the Consultation Process.

Speaking as a chartered town planner, and there are many others from that profession involved in this Inquiry, I think we should be a little humble. We have given the public : tower blocks, peripheral housing estates and to a lesser extent new towns, which have undoubtedly made life a misery for many of our citizens.

I and many others are not in a position to judge the technical knowledge of certain professions, for instance, such matters as grid capacity, and it is for those professionals peers' to judge their competence.

There are, however, other 'softer' professions where the expert is effectively representing the public; planning and landscape architecture come to mind. In relation to landscape and visual impact, the role of the professional is to defend the scenic qualities and minimise the impact of potentially harmful developments for the public good. It is quite appropriate to develop methodologies to inform this process and ensure a systematic process is followed, but at the end of the day the matter often comes down to a value judgement about which even the professionals may disagree. In this case we have two landscape architects representing the applicants coming to different conclusions to those representing SNH, the Councils and Community Groups.

In paragraph 6.5 above I have quoted George Reid MSP in relation to this application ' One of the fundamental principles of our new democratic structures in Scotland is Participation – the right of citizens to have a voice in decisions which affect them and future generations'. This is certainly applicable to my own experience in the community based housing movement, which is seen as being at the forefront of regeneration and housing policy in Europe. Here over a thirty year period local communities have been seen to invest many millions of

pounds of expenditure more sensibly and effectively than professionals did in the past.

In relation to this application in Stirling the professionals preparing the ES have given little weight to : the iconic views of the National Wallace Monument, Stirling Castle, the Sheriffmuir battlesite, the Ochil Hills and so on. There are undoubtedly a number of alternative professional opinions to theirs presented to this Inquiry. I would ask the Reporters to place due weight on informed public opinion, which strongly objects to the proposals on the above grounds. Generally, I have found that on bigger picture issues like these the public is correct and often the professionals can be wrong.

11. Concluding Remarks

- 11.1 We would ask the Reporters to have in mind the criteria used by the Inspectors to the North Yorkshire Inquiry in reaching their conclusions.
- 11.2 It has been demonstrated in this submission that the applicants reached the conclusion that an OHL from Beaully 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.
- 11.3 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.

- 11.4 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.
- 11.5 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.
- 11.6 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’.

- 11.7 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.
- 11.8 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.

11.9 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 , *and* 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 Stirlings heritage will almost certainly reflect the criticisms made by the public and George Reid in para 8.5 above.

11.10 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.

11.11 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.

[END]