

CAIRNGORMS NATIONAL PARK AUTHORITY

Title: **BEAULY - DENNY 400kv OVERHEAD TRANSMISSION LINE: RESPONSE TO THE SSE 'INTERIM REPORT ON CONSULTATIONS AND SELECTION OF INDICATIVE PROPOSED ROUTE'; and RESPONSE TO SCOTTISH EXECUTIVE SCOPING REPORT.**

Prepared by: **Norman Brockie**

Purpose:

The aims of this report is to respond to SSE on their 'Interim Report on Consultations and Selection of Indicative Proposed Route'; and to respond to the Scottish Executive on the Scoping Report, as to what should be in the Environmental Statement (see Appendix 1).

Following this we will be consulted on the Section 37 (Electricity Act) Application Consultation towards the end of the year.

Recommendations:

The Board agree this responses to the SSE consultation and Scottish Executive report.

Executive Summary: SSE Consultation.

While our preferred option from a CNPA perspective continues to be that the Transmission Line does not cross through the CNP, we appreciate that consideration of alternative routes within the wider national context has concluded that the existing 'pylon-corridor' is the best general option (in the opinion of other consultees), given a range of wider public interest considerations outside the CNP.

We do not, however, feel that we reach a firm view on the 5 route options (from Spey Dam to Dalwhinnie) with the current levels of information and detail. If the line is to pass through the CNP then this raises issues of national significance that require detailed analysis. Equally, thorough investigation of possible mitigation measures should be the highest priority to alleviate the impacts on communities, the environment and the landscape.

Visualisation of the scheme, whether through photo-montage or computer generation, is essential so that consultees can fully appreciate the impact of this proposed development. The design and placement of pylons are also key details that are required before any proper analysis and response can be provided. Under-grounding still needs to be considered seriously, and could determine which route is finally chosen. The technicalities and costs need to be carefully balanced against the potential damage to a nationally important landscape at the main southern gateway to the CNP. Further discussion is also needed about possible mitigation measures which could be

incorporated within the scheme, and there is a need to consider greater transparency in the public consultation currently ongoing.

Executive Summary: SSE Consultation. (see Appendix 1).

SSE have formally requested a scoping opinion from the Scottish Ministers, in accordance with regulation 7 of the Electricity Works (Environmental Impact Assessment)(Scotland) Regulations 2000, for their proposed transmission line from Beaully to Denny.

To compile this opinion, the Scottish Ministers are consulting interested and affected bodies on what they think should be included in the Environmental Statement.

Appendix 1 contains a list of our responses.

The Previous SSE Consultation:

1. Our response to the initial consultation, at Committee in the Lonach Hall on 12th March 2004, was that we would prefer the line not to pass through the CNP at all. This position remains unchanged, and was reached from the perspective of our remit as the CNPA. We recognise and accept, however, that other respondents charged with taking a wider national perspective came to a different view on the initial consultation, primarily because of concern over potential impact on wild land areas outside the CNP that were not material considerations in our assessment (because they were outside our remit). There is no inherent contradiction between their initial conclusion and ours, because we were each making the assessment from the perspective of organisations with differing remits.

The New SSE Consultation: Main Issues.

2. This new consultation does not offer us the option of the line not passing through the CNP, and we must therefore respond on this basis. We have examined the five options presented and have concluded that we are unable to reach any firm conclusion on a preference because insufficient information has been made available in order to enable us to do so. We regret this given the urgency that we know is attached to this matter. At this stage, therefore, we do not intend to indicate a preference for any one of the five options presented, but rather we wish to highlight the key issues that we think must be addressed before a proper assessment can be made, not only by ourselves but also by others with a legitimate interest including government agencies, local communities and the wider public. We urge SSE to address these as a matter of priority.
3. The key issues are: visualisation, under-grounding and design issues.
4. Visualisation: It is extremely difficult to assess a development of this magnitude, and its impact on the landscape, environment and communities, from maps and plans. Photo-montages are required so that the impact of these massive pylons can be fully assessed. Ideally, a computer-generated 'walk-through' of the routes would be produced to further explain and demonstrate how the development will be viewed and perceived within the landscape.
5. Under-grounding: the issue of under-grounding is one which we feel is too easily dismissed on the grounds of cost and technical issues. The Cairngorms National Park is an area designated for its National importance, and as such every effort should be made to minimise the impacts from this development. While there is an undeniably huge impact from the excavations, these can be landscaped and seeded and will regenerate over time. Alternative technologies such as tunnelling could also be investigated, particularly where passing through the Drumochter Natura site.
6. Particular areas where under-grounding or tunnelling could be applied are:
 - The Drumochter Pass: this is a narrow corridor where the presence of the pylons will be particularly intrusive and overpowering; the effect on the Natura site is also a major issue.
 - The crossing of the A9/Glen Truim.

As much of the line as possible should be under-grounded, to justify the terminal-towers and compounds at each end; the impact from these can be minimised by careful screening and landscaping. The crossing of watercourses cannot be impossible to achieve, as it is commonly done by oil pipelines.

7. The issue of under-grounding would also seriously affect the choice of route options; for example, the red (existing pylon) route may be the easiest one to under-ground and would therefore be the best option.
8. Design issues: it is also difficult to assess the routes when we don't know the actual detail design, on issues such as: pylon design, pylon positions, the extent of possible under-grounding, landscaping measures and screening options. Issues such as where and how pylons cross the skyline will also be of prime importance (or another instance where under-grounding/tunnelling should be considered).
9. Following-on from design issues, we feel that there should be an examination of best-practice from Europe or worldwide, as to how other countries deal with major transmission line developments. Presumably there must be a variety of technologies, designs or methodologies for taking such developments through sensitive and scenic areas. We would be interested to see what research SSE have carried out into methods undertaken elsewhere.
10. Other issues of concern are the mitigating measures that will compensate for the developments impact, the transparency of the consultation process, alternative route options, the perceived lifespan/ of the development, decommissioning plans and sustainability appraisal.
11. Mitigating measures: both for impacts on local communities and on the environment/landscape, should be built into the scheme from the start, not merely added-on at the end. While we are aware that many small-scale measures have been agreed with the Laggan and Dalwhinnie communities, we do feel that the impact on the national interest should also be mitigated in some way, for the intrusion of this major development into a national Park. The Park, which has been designated for the nation (and everyone who pays electric bills) is planning to have its major 'gateway' in the Drumochter Pass; this will comprise signage and a lay-by with information and picnic facilities. Assistance could be given towards the provision of this facility. Equally, thought should be given to the removal of unsightly pylons elsewhere in the Park. Mitigation measures should also be incorporated throughout the scheme to directly mitigate the visual, environmental and physical impacts of the development.
12. The transparency of the consultation process has been questioned by the Board at the presentations we have received from SSE. It is normal for a consultation report to provide more detailed accounts of responses received; the SSE Report on Consultations summarises the 22 responses within our area to 6 bullet points and 2 short paragraphs. Consultations for such a major development, relating to a public utility, should be detailed and put in the public domain (with names/addresses removed if privacy is required).
13. An alternative option for routing that has been raised in the past, but not investigated, is to take the line from approx. 2km west of the Spey Dam reservoir,

down Glen Shirra and round towards Strath Mashie, making use of tree screening en route. This would avoid any impact on the Laggan community and Dun-da-Lamh hill fort.

14. The lifespan of the development was also questioned; if in 10 or 20 years time the windfarms in the NW of Scotland are replaced by alternative forms of renewable energy elsewhere, is there a contingency plan for downsizing these massive pylons if the 400kv capacity is no longer required?
15. A development of this scale and impact should be assessed by a thorough sustainability appraisal.

Conclusions to the SSE Consultation:

16. While our preferred option would continue to be that the Transmission Line does not cross through the CNP, we appreciate that consideration of alternative routes within the wider context has shown the existing 'pylon-corridor' to be generally regarded as the least worst option, particularly in relation to developing 'wild land'.
17. We do not, however, feel that we can choose one of the 5 route options (from Spey Dam to Dalwhinnie) with the current levels of information and detail. The issue of the line passing through a National Park is one which is of significance to the whole nation and decisions cannot be taken lightly; equally, mitigation measures should be the highest priority to alleviate the impacts on communities, the environment and the landscape.
18. Visualisation of the scheme, whether through photo-montage or computer generation, is essential so that consultees like ourselves (or the general public) can fully appreciate the impact of this proposed development. Under-grounding still needs to be considered very seriously, and could determine which route is finally chosen; the technicalities and costs need to be carefully balanced against a nationally important landscape which would not be blighted by huge pylons. The design and placement of pylons will be required for our assessment of the Electricity Act application.
19. Other issues which concern us are the mitigation measures which should be incorporated within the scheme, and the transparency of the public consultation. We would also expect to see a thorough sustainability appraisal of the proposed scheme including outline decommissioning plans.

APPENDIX 1: RESPONSE TO THE SCOTTISH EXECUTIVE ON THE SCOPING REPORT on the ISSUES TO BE COVERED BY THE ENVIRONMENTAL STATEMENT.

The Environmental Statement will be structured under the following headings: visual impact, ecology and nature conservation, archaeology and cultural heritage, landscape, agriculture and forestry, recreation and tourism, planning and development, hydrology, infrastructure, and physical effects.

The Electricity Works (Environmental Impact Assessment)(Scotland) Regulations 2000, require these headings to be considered against the following topics: population, fauna, flora, soil, water, air, climatic factors, material assets - architecture & archaeological heritage, and landscape.

The following table (from the Scoping Report) shows the inter-relations between them:

	pop.	fauna	flora	soil	water	air	climate	assets	landscape
Visual Impact	X								X
Ecology & nature		X	X	X	X				
Archaeology & culture		X						X	
Landscape	X							X	X
Agriculture & forestry				X				X	X
Recreation & tourism								X	X
Planning & development								X	
Hydrology		X	X		X				
Infrastructure								X	
Physical impacts		X							

No significant impacts are anticipated for air or climatic factors.

Our responses will be grouped by the chapter headings for the Environmental Statement:

- a) Visual impact: the visual impact from a development of this scale, on the nationally important landscape of the Cairngorms National Park, will be extremely significant. While the route has yet to be finalised, where it crosses through the Park and the issue of overhead lines/under-grounding, have yet to be resolved to our satisfaction. Visualisation of the true scale of this project is almost impossible, and certainly cannot be done from maps. ZVI (Zones of Visual Influence) studies will show the distance from which pylons can be seen, but a comprehensive set of photo-montages will be vital to truly assess the impact. Suggested viewpoints include: Drumochter Pass (looking north & south), Dalwhinnie (views from and to), the crossing point of the A9, [and depending on which route is chosen] Glen Truim, Laggan, Strath Mashie, Spey Dam, Dùn-da-Lamh hill fort.

- b) Ecology and nature conservation: within the National Park the transmission line will make a significant impact on several designated sites, which include the River Spey (biological SSSI & cSAC for freshwater pearl mussels, sea lamprey, Atlantic salmon and otter) and the Drumochter Pass (biological SSSI, cSAC for dry heath and alpine flora, SPA for breeding dotterel and merlin). The ES must very carefully assess the impacts on these European designated sites, from all stages and facets of the development. Within these sites, pylon positions/routes for under-grounding will be required for the ES. Outwith these Natura 2000 sites, the ES should also carefully assess the impacts of the development on all flora and fauna within the National Park, and for all areas, address the mitigation measures that are necessary.

- c) Archaeology and cultural heritage: Dùn-da-Lamh hill fort is the only scheduled ancient monument within this section of the Park, and whose setting will be severely affected by the transmission line. The importance of this heritage should not be under-estimated and the ES must carefully assess how its setting can be safeguarded.

- d) Landscape: The impacts from the proposed development on this landscape is a matter of national significance, where the transmission line will cross the Cairngorms National Park. It is the belief of the CNPA that significant sections of the line should be under-grounded, to lessen the long-term impacts on the landscape. At the Pass of Drumochter, the narrowness of the Pass will necessitate the line running beside the A9, dominating the landscape. Moving north into Glen Truim the landscape is a wide open valley, in which the pylons will stand in dominant isolation. Whichever route the line takes over to Spey Dam, will either necessitate crossing over hills, over moor or another wide open valley. The ES must very carefully assess the impacts on this landscape which is designated for its national importance, and look very seriously at the issue of under-grounding ~ without immediate dismissal on cost or technical issues. Other methods and technologies for under-grounding or tunnelling should be sourced, along with examples of best practice from outwith the UK.

- e) Agriculture and forestry: The ES should assess the extent of tree-felling that will be required along the transmission line route (for safety and operational reasons) and also the impact that it will have on crafting, farming and sporting estates.

- f) Recreation and tourism: the Laggan and Dalwhinnie areas are heavily dependant on tourism and recreation for their economic viability; people will not choose to stay in, or visit, an area blighted by huge pylons; equally, walkers and other outdoor activities will likely re-locate to areas where the natural beauty is unblemished. Fishing may also be discouraged close to overhead lines. The ES should carefully assess the tourism and recreation activity within this area, consider how it will be affected and what mitigation measures can be taken against the developments' visual and physical impacts.

- g) Planning and development: The ES should consider all planning permissions in the 'development zone', either full or outline, which are in place when the Scoping Report is published, or another agreed date. Existing development plans should also be studied in case policies or proposals will be affected.

- h) Hydrology: The ES should clearly define the impacts that will be made on hydrology, drainage and watercourses by any facet of this development (including the construction of foundations, access roads and under-grounding).
- i) Infrastructure: the impacts on infrastructure are most likely to be to road and rail systems during the construction of the project, particularly where the transmission line closely follows the A9 or crosses the railway line. The ES should stipulate the procedures which will minimise disruption to travellers or access for local people. Where the transmission line will cross other power lines or telephone lines, these should be placed underground to avoid interference.
- j) Physical effects: this covers the power frequency electric and magnetic fields (EMF), audible noise and radio & tv interference. The EMF issue should be mitigated by the powerlines and any sub-stations etc. not being within 100m of a dwelling-house or occupied building, which should be demonstrated by the ES. The same criteria should apply for audible noise, and assurances will be required that radio & tv reception will not be affected by the line; where it is, SSE should make compensation.

For all these issues, the ES should consider the impacts at 3 stages of the project:

- the decommissioning and demolition of the existing transmission line.
- the construction phase including all associated works (such as access roads and ancillary buildings) as well as temporary works (such as site offices/compounds and temporary access tracks)
- the long-term impacts of the completed project.