



Beauly - Denny Electricity Transmission Line

The John Muir Trust has submitted an objection to the proposed Beauly - Denny 400kV electricity transmission line.

Our objection is based on the following:

- that the line will pass through land which is wild land;
- that the line will have significantly more impact than the current 132kV line;
- that undergrounding the electricity cable in specific wild land areas and in the Cairngorms National Park is said by the developers, Scottish and Southern Energy, to not be a feasible option;
- the precedent this would set for allowing encroachment on other wild land

The Trust is calling for a Public Enquiry and a Strategic Environmental Assessment so that other options, such as using subsea cables, can be properly assessed. Anyone can submit an objection which must be with the Scottish Executive by the 12th of December, 2005. Email submissions are acceptable.

Write, by 12th December 2005, stating your objection to the Beauly to Denny Transmission Line, to:

Mr David Ray
Energy Consents Unit
Scottish Executive
Meridian Court
5 Cadogan Street
Glasgow
G2 6AT

Email David.ray@scotland.gsi.gov.uk

Full Objection

David Ray,
The Scottish Executive,

Consents and Emergency Planning Unit,
Meridian Court,
5 Cadogan Street,
Glasgow
G2 6AT

9th December, 2005

Dear Mr Ray,

Re. Proposed Beauly – Denny 400kV Transmission line

I am writing to you on behalf of the John Muir Trust. The Trust works to protect and conserve wild places and to increase awareness and understanding of the value of such places. We are, therefore, interested in grid developments and their possible impact on wild land.

A SCOTTISH ENERGY STRATEGY

The John Muir Trust is concerned about the effects of climate change and the implications of global warming for the environment and wild land. The Trust supports government moves to achieve reductions of carbon dioxide emissions into the atmosphere from fossil fuels by increasing the proportion of energy produced by renewable energy sources. The Trust wishes to protect Scotland's finest wild areas and so is opposed to major developments which impact on these. The Trust's policies are set out in Appendix 1 (John Muir Trust Wild Land Policy) and Appendix 2 (John Muir Trust Renewable Energy Policy).

On the periphery of wild land, the Trust supports the development of small-scale, sensitively sited renewable energy schemes in areas adjacent to existing settlements which benefit local people and which demonstrate that renewable energy may be sourced without significantly impacting on wild land. The Trust, while in support of the development of renewable energy systems, opposes new developments where they significantly threaten wild land. The Trust is committed to sustainable land management and, therefore, opposes large, industrial-scale windfarms which impact on wild land. The Trust also opposes the infrastructure for such developments where they impact on wild land.

With the building of a 400kV Beauly-Denny transmission line, there would be a massive increase in capacity which may well decrease the impetus for major efforts on energy efficiency and more local production and distribution, which are critical for a more sustainable future. The Scottish Parliament Environment and Rural Development Committee stated in its Inquiry into Climate Change that 40% of energy used could be saved by energy efficiency measures but that "Energy efficiency measures have struggled to gain a high priority". The John Muir Trust believes that, before a commitment is made to this increased transmission capacity on land, further investigation of the many factors is required.

The John Muir Trust believes the Scottish Executive should urgently produce, in a transparent and consultative way, an energy strategy for Scotland. This must include the electricity distribution network. In this way, all relevant factors - social, environmental and economic – can be weighed up. This would then provide a national

framework for planning decisions allowing prioritisation of renewable energy development in less sensitive areas, rather than the localised system of planning which is currently in place and which is the context for the Beauly-Denny line application.

NEED FOR A STRATEGIC ENVIRONMENTAL ASSESSMENT

The John Muir Trust objects to the proposed Beauly-Denny transmission line and believes a Strategic Environmental Assessment is essential to consider the wider environmental costs and benefits of alternative approaches. The Environmental Statement has been undertaken to allow Scottish and Southern Energy to pick the least damaging option, within the remit of providing a transmission line between Beauly and Denny. However, it does not allow for examination of alternatives to the Beauly-Denny option, or examination of the basic assumptions which are being used to justify the Beauly-Denny expansion. For instance, it does not seem logical that a decision can be taken by the Scottish Executive on the Beauly-Denny transmission line in advance of the Scottish Executive taking a decision on the Barvas windfarm in Lewis, since this is one of the projects which is used in the justification for the line expansion. If the planning system is meaningful then the decision on this project and others still has to be made.

NEED FOR A PUBLIC ENQUIRY

The John Muir Trust believes that a Public Enquiry should be held to consider matters outside the scope of the more limited Environmental Impact Assessment. The Environmental Statement states, whilst discussing SPP15 on page 16-12, that “The development of Scotland’s Renewables agenda will inherently impact upon the rural environment and have a positive impact upon the rural economy.” This is debatable IF developments such as the expansion of the transmission network are not rigorously assessed to ensure that they are being located in places where the environmental and economic impacts (e.g. through reduced tourism) are acceptable or if the impacts of developments are not fully costed before decisions are taken. If this assertion is put forward as a material fact in the Environmental Statement then the figures which back up this case should be included. Otherwise it should be disregarded when considering whether the application should be approved.

In 16.5.3.3 (Cairngorms National Park), the ES states that “The over-riding strategic need for the proposed project is clearly presented within Chapter 3 and is an important consideration to be balanced against protection of environmental resources, and overall impact.” This is a clear indication that the Environmental Statement is not confining itself to informing “interested parties about the likely significant effects of the project on the environment”, as stated on page 1-1, but is making value judgments about the need for the project justifying the over-riding of environmental concerns. This would seem to be outwith the scope of the document and is something which should be addressed by a Public Enquiry since the mechanisms needed to deliver a sustainable, renewable energy strategy have not been examined fully.

SPECIFIC CONCERNS

Specific areas of concern to the John Muir Trust are:

- that the line will pass through land which is wild land (Details Below).
- that the line will have significantly more impact than the current 132kV line;
- that undergrounding the line in specific wild land areas and in the Cairngorms National Park does not appear to be an option, according to the developers;
- the precedent this line would set for allowing further encroachment on other wild land.

Although there are no “major adverse” effects identified in the ES, there are a considerable number of “moderate adverse” effects. Collectively, this means that the new 400kV line will significantly affect the visual experience of the landscape in some parts of the route.

Sections in or near Key Areas of Wild Land which are of concern to the John Muir Trust are

- Tomich (NH3127) – Dundreggan (Glen Moriston) (NH3013);
- Fort Augustus (NH3706) – Corrieyairack Pass – Garva Bridge (Upper Spey) (NN5195);
- Feagour (Strath Mashie) (NN5790) – Dalwhinnie (NN6288);
- Dalwhinnie (NN6484) – Drumochter Pass – Dalnacardoch (Glen Garry) (NN7170).

The John Muir Trust also has concerns about the effect the proposed line will have on the landscape around East Schiehallion which is a property owned by the Trust and which is much valued by walkers. The part of the line which would impose on the view from Schiehallion is

- Tummel Bridge (NN7658) – Loch Kinardochy – Keltneyburn (NN7849).

As the Environmental Statement does not identify where, along the route, pylons will be sited and as there is leeway of a hundred metres either way along a large section of the route, it makes it very difficult to be specific about local impacts. It is understandable that some latitude is required to allow for engineering and local environmental factors which are discovered in construction but this could have serious implications which cannot be assessed until the sites of the pylons are specified.

ALTERNATIVE TRANSMISSION METHODS

Scottish and Southern Energy have said that they considered other methods of transmission, such as subsea cables or undergrounding. As evidence of this, the Environmental Statement says, regarding undergrounding cables, on page 6-5, that undergrounding would cost between ten and twenty-five times more than the overhead line. SSE have also stated publicly that the subsea option would have similarly prohibitive costs. However, AMEC have now publicly suggested that the energy from the proposed renewable projects in the Western Isles could be taken the equivalent distance south, by a subsea cable, for a figure of no more than two times the cost of the Beaully-Denny overhead line, even before taking into account the costs of transmission from the Western Isles to Beaully.

Since the proposed Western Isles projects are a major factor in the case for the Beaully-Denny interconnector, this would seem to be such a major shift in the stance of the energy companies involved, that it gives further weight to the need for a wide-ranging Public Enquiry to consider the conflicting information from some of the key developers involved

and others and to consider whether new information has become available since SSE and Ofgem made the decision that Beaully-Denny was the best option. Moreover, the fact that an application for the Western Isles to Ullapool and Ullapool to Beaully transmission links is not submitted alongside the Beaully-Denny line, despite being an essential part of the current proposed transmission network upgrade, is of serious concern.

Such an approach means it is possible that some parts of the renewable energy and transmission network will be given approval in a piecemeal way whilst other parts – essential to join the network together – might be refused. If this is not a realistic scenario, it raises questions about the current planning process.

Another factor which materially affects the viability and desirability of subsea routing is the possibility of future renewable energy projects which are offshore. Offshore projects - wind, wave or tidal – would also detract from the justification for the Beaully-Denny line and increase the arguments in favour of subsea options. This increases the need for a wide-ranging Public Enquiry into the whole energy and transmission picture in Scotland so that the decisions made are contributing to a sustainable Scotland, rather than just the apparently cheapest option for the electricity distribution network.

BENEFITS OF A PUBLIC INQUIRY

A Public Enquiry would allow the costs and benefits of all options to be weighed up, taking into account the relative environmental, economic and social benefits of each. Allowing the Beaully-Denny line to go ahead without a far-reaching Public Enquiry could be far more costly to Scotland in the long run. It might well be, for instance, that the benefits to the economy including tourism and for the environment could outweigh the increased costs associated with laying subsea cables. Due to the huge implications that a decision on the Beaully-Denny line will have, far beyond even the extensive area of Scotland which it passes through, the John Muir Trust urges the Scottish Executive to hold a Public Enquiry into this application.

Yours sincerely,

Helen McDade
JMT Policy Officer