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Your ref: 2018/0003700

22 March 2018

Keith Brown

Cabinet Secretary for Economy, Jobs and Fair Work

The Scottish Government

St. Andrew's House

Regent Road

Edinburgh

EH1 3DG

Dear Mr Brown,

**Kendoon to Tongland 132kV Reinforcement Project (‘KTR’ or ‘Project’). Proposed by SP Energy Networks (‘SPEN’), subsidiary of Spanish energy giant, Iberdrola.**

We, the undersigned, note the contents of the reply dated 16 February 2018 to our letter on 23 January 2018, and are disappointed with the response from your Private Secretary. As you will be required to determine SPEN’s application for the KTR Project, it is important that you meet with us to hear the views of those it will impact most. We understand that you must avoid a conflict of interest but SPEN will have the opportunity to put their case directly to you in the planning application. We think it is only right that you give us, the community, an equal platform.

When SPEN submits its application for the Project, it will have conducted its own research, held three rounds of public consultation, gathered and ignored most of the feedback, and presented the public’s views in a way that supports their preferred scenario. Yet SPEN are not independent observers! SPEN will present you with the one and only option it wants you to “rubber stamp”. Up until that point, it will have been the Judge and Jury presiding over its own case, so it is impossible for them to run an independent process when they have a vested interest in presenting you with their preferred option of overground pylons, which you should know is deeply unsatisfactory to most residents and businesses in Dumfries and Galloway.

Balmaghie Community Council oppose the project in its current form and are strongly in favour of undergrounding. This view has also been supported by representatives of Twynholnm Community Council, Balmaclellan Community Council, The Royal Burgh of New Galloway & Kells Community Council, Gatehouse of Fleet Community Council and Dumfries & Galloway Council. SPEN cannot be allowed to continue to ignore the wishes of the local community. It is for these reasons we believe you should be presented with a number of options to choose from which don’t only reflect SPEN’s preference.

With that in mind, we understand cabling consultants have been appointed following the Scottish Government’s view that SPEN’s Environmental Impact Assessment (‘EIA’) for the KTR Project should consider alternative measures such as undergrounding. However, we are deeply sceptical that anyone recently appointed by SPEN as cabling consultants to examine the feasibility of undergrounding the proposed transmission route, can do so independently. They are being paid by SPEN to carry out this assessment, and are almost certain to give SPEN the answer they have said all along they want: overhead lines.

In the interests of fairness and transparency, cabling consultants should be appointed by the Scottish Government, and not SPEN, to examine the feasibility of undergrounding. As there is overwhelming demand from residents and businesses in the tourist industry in favour of undergrounding, the scope and brief of their work should be agreed by all stakeholders, including those of us from the Dumfries and Galloway.

The Scottish Index of Multiple Deprivation shows that Dumfries and Galloway is home to some of the most deprived areas in Scotland, so we ask you minister to support us in protecting our valuable local tourist economy which is worth £302 million each year, and supports 7,000 local jobs. Our area is renowned for stunning natural scenery and uninterrupted views, and the Dumfries and Galloway Regional Tourism Strategy plans to increase this figure to £330 million by 2020, with a heavy emphasis on nature-based tourism. The route as is currently proposed however threatens that, along with several tourist sites of natural and historical importance. Dumfries and Galloway needs jobs, and we would ask you to help us create more.

The National Grid plans to bury 23.4km (14.5 miles) of new line underground through the entire western section of the Lake District National Park, and remove existing lines, leaving this part of the Park free of pylons for the first time in 50 years. They are also removing 45 pylons in parts of the New Forest, Peak District and Snowdonia National Parks and in an area of “outstanding natural beauty” in Dorset. Similarly, UK Power Networks have removed overhead power lines and poles which run alongside and across the tranquil River Waveney in the Barsham and Beccles area which sits on the Norfolk/Suffolk border. The lines have been replaced with underground cables which run underneath the river.

Finally, not only have SPEN not adequately communicated to the Government and local people, the real potential height of the proposed pylons, but now they have begun to seek approval for the expansion of the Glenlee Substation. I am deeply concerned that the expansion of the Glenlee Substation will prejudice the decision on the KTR by creating the circumstances that favour going ahead with the project. These two projects are clearly linked and should be treated as such. The Glenlee Substation project should be delayed until we have clarity about the KTR project. I would be grateful if you could assure me that the outcome of the decision on the KTR will not be influenced by the plans to expand the Glenlee Substation.

Once again, we insist that those of us from affected communities should have the opportunity to meet jointly with you and truly independent cabling consultants to ensure our concerns are addressed, and that the right supporting arguments are heard.

In anticipation of your response, we look forward to your reply. Please contact Ed Orlebar or Joe McGregor at ed.orlebar@tbcardew.com / joe.mcgregor@tbcardew.com

Yours sincerely, the below signed individuals and organisations.