15 August 2018

Derek Mackay

Cabinet Secretary for Finance, Economy and Fair Work

The Scottish Government

St. Andrew's House

Regent Road

Edinburgh

EH1 3DG

Dear Mr Mackay,

**Kendoon to Tongland 132kV Reinforcement Project proposed by SP Energy Networks, subsidiary of Spanish energy giant, Iberdrola.**

We are writing to highlight the widespread concerns about the Kendoon to Tongland 132kV Reinforcement Project (‘KTR’ or ‘Project’) proposed by SP Energy Networks (‘SPEN’), the subsidiary of the Spanish energy giant, Iberdrola and the significant adverse economic, environmental and visual effects that the Project will have on the area. We accept that the line needs to be updated, but the use of overhead pylons is opposed by all local groups including those concerned with: forestry protection, National Park status, business, tourism, wildlife conservation, and the protection of historic sites. Only SPEN is in favour of their use.

A number of MPs, MSPs and members of the relevant local councils have expressed their concerns about the overhead line. Alister Jack MP and 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. If the line must go ahead it is clear that the option that best serves the interests of the community and all other stakeholders is underground cabling.

We have outlined below a summary of the areas and communities that will be affected.

**Woodland**

SPEN have stated that in order for these pylons to be built a 100 meter-wide corridor through a woodland landscape is required. This would result in the felling of thousands of trees. However, if the cable were underground a much narrower corridor would be needed, minimising the impact on our woodland.

**National Park Status**

For years individuals and groups have been campaigning for Galloway to be given National Park status. If this is successful, The Galloway National Park Association says it could generate up to £60 million a year for the region’s economy and help support 1,400 jobs. The construction of this new, much more visually intrusive, pylon line will undoubtedly have a negative impact on any application. National Parks in England have had cables placed underground, and the same should be done here.

**Tourism**

The Dumfries and Galloway Regional Tourism Strategy estimates that tourism is currently worth £302 million each year to the local economy, and it is forecast to increase to £330 million by 2020. The nature and scenery in Dumfries and Galloway is beautiful, but the KTR in its current form threatens the Council’s strategy to grow the economy through nature-based tourism. Scottish Enterprise have also indicated that more pylons would have a negative impact on tourism.

**Wildlife**

The RSPB have stated that they have significant concerns about the potential collision risk for nightjars. 95% of the Scottish population of this protected species is to be found in Dumfries and Galloway. Why would SPEN unnecessarily endanger nightjars when they can use underground cables?

**Conclusion**

We strongly believe SPEN have not been upfront with their planning approach. By dividing up the project into numerous smaller projects, across several communities, it obscures the true geographical scope of the work that will be taking place and conceals the environmental and economic cost to Dumfries and Galloway. The KTR is only one small part of the wider plans for the region, and if not undergrounded it will set a precedent for the use of overhead pylons throughout Dumfries and Galloway, jeopardising its future.

The Project in its current form benefits SPEN above all. Despite concerns being raised by multiple stakeholders SPEN are pressing ahead and submitting plans for overhead pylons, which they have always favoured and as a result the consultation has been geared towards this outcome. We fail to see how SPEN can be impartial when conducting the Environmental Impact assessment or the consultation. We believe they have gathered feedback and then gone ahead with the plan that they intended to carry out in the first place, with only minor and superficial changes.

The use of an overhead pylon line is an outdated approach and if the KTR goes ahead with it, it will be extremely damaging to the local community, the outstandingly beautiful environment and the local economy. We are appealing to you to do what is in the best interest of Dumfries and Galloway and ensure that SPEN uses underground cables for the KTR Project.

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,

Galloway Without Pylons

[www.gallowaywithoutpylons.org](http://www.gallowaywithoutpylons.org)