January 2018

Keith Brown

Cabinet Secretary for Economy, Jobs and Fair Work

The Scottish Government

St. Andrew's House

Regent Road

Edinburgh

EH1 3DG

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

Dear Mr Brown,

We, the undersigned, support the Scottish Government’s view that SPEN’s Environmental Impact Assessment (‘EIA’) for the KTR Project should consider alternative measures such as undergrounding, to, as the Government put it, *“avoid, prevent or reduce and if possible offset the likely significant adverse landscape and visual effects where these have been identified through consultation feedback from affected communities”[[1]](#footnote-1)*

Cabling consultants have since been appointed by SPEN to examine the feasibility of undergrounding the proposed transmission route, and those of us from the affected communities would like to request a joint meeting with yourself and the consultants so we can explain why this would be the best option to mitigate the environmental, economic, and impractical impacts of KTR.

SPEN have already identified the topography between Glenlee and Tongland as being complex, presenting a number of difficulties for the routeing of an overhead line. The proposed route will have to be forced through an undulating and dense woodland area with many other natural and historic features that will have to be sensitively navigated. Installing the line underground will allow the line to travel from Kendoon to Tongland unimpeded by the challenges of the landscape.

Furthermore, the proposed overhead line requires a 100-metre-wide corridor to allow space for the pylons, and in our wooded landscape, this will undoubtedly require a huge number of trees to be felled. Underground cables meanwhile would require a corridor of between 15 to 20 metres, and would minimise deforestation.

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 bid to achieve National Park status in the Galloway Forest Park could be severely threatened if destructive overhead pylons are allowed to damage the local environment and economy. It is estimated that a Galloway National Park could generate up to £60 million a year for the region’s economy and help support 1,400 jobs. This is an opportunity that Dumfries and Galloway cannot afford to miss. Currently Scotland has fewer National Parks than both England and Wales, and we would welcome your support to help address that.

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.

If this kind of environmental and economic sensitivity is good enough for the rest of the United Kingdom, shouldn’t the same standards, if not better, apply to the Galloway Forest Park, if not all of Scotland’s forestry and parks?

Finally, we hope you will support our concern that to date proposals by SPEN have not adequately communicated the real potential height of the proposed pylons. In all three rounds of consultation, including the latest EIA document, SPEN have stated that the pylons would be a maximum of 27 metres in height when, in a private meeting they recently disclosed that pylons could reach as high as 38 metres; the equivalent of an 11-storey building. This new, previously undisclosed, information only adds weight to the view that the KTR Project should be undergrounded.

Those of us from the affected communities should have the opportunity to meet jointly with you and SPEN’s 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 David Roach or Joe McGregor at [david.roach@cardewgroup.com](mailto:david.roach@cardewgroup.com) / [joe.mcgregor@cardewgroup.com](mailto:joe.mcgregor@cardewgroup.com)

Yours sincerely, the below signed individuals and organisations.

1. Scoping opinion of behalf of Scottish Ministers under regulation 12 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, p7. [↑](#footnote-ref-1)