



*Dumgal Against Pylons*

Dear David,

**DGAP reply to Frank Mitchell's letter dated 16 November 2015**

Thank you for sharing the contents of Frank Mitchell's letter with us.

We were heartened to read that SPEN have not ruled out using the existing route in its entirety and that this is to be considered further in the next stage of planning with the Stakeholder Liaison Group. We were also pleased to learn of the 1600 items of feedback and the assessment process underway to review and reflect on the comments received. We look forward to seeing this exercise result in a less damaging proposal both for the region and its people.

There were, however, several areas in Frank Mitchell's letter that raised concern. These are outlined below and we respectfully suggest they form part of any response.

**1 The Stakeholder Liaison Group**

Frank Mitchell, in his letter, describes the purpose and role of the SLG and in this regard we have no issue. It is a collective of statutory consultees that met on three occasions prior to the 1<sup>st</sup> Public Consultation. In the minutes of the first meeting it defines its role as 'discussing high level issues and specific technical matters from the routeing and environmental assessment process. However, Frank Mitchell in his letter states, 'We take confidence that our proposals have been shaped and influenced by the SLG ...' This statement causes us concern because it is misleading.

The statement implies that that SLG members, whose attendance is on a non-prejudice basis, shaped and influenced the proposal. An examination of the minutes of the meetings held on the 21 February 2014, 13 March 2015 and the 24 April 2015 indicate that non-SPEN stakeholders asked questions about the process but they did not shape or influence the proposal, i.e. the shape, size, scale and implementation of the project. Questions were

asked to clarify understanding but there is no evidence in the minutes of the shaping process to which Frank Mitchell refers.

This use of the term shaping implies some form of shared responsibility for determining outcomes or commitment to a course of action. The only shaping that might be argued to have taken place is with regard to the process to be adopted, such as the proposed landscape methodology and the mechanisms of the public consultation.

To summarise, Frank Mitchell paints an overly reassuring picture in his letter and while the process may have been shaped by stakeholders attending these SLG meetings the proposal itself was not. The proposal, based on an overhead line approach, remains squarely within the domain of SPEN.

## **2 Route selections problems for Planning Authorities and Statutory Consultees**

On page 2 of his letter, Frank Mitchell refers to three examples where SPEN anticipate that utilising the existing transmission route may present difficulties for the planning authority and statutory consultees in relation to alternative routes. All three examples are incorrect.

2.1 The distances between the nearest settlements at Castle Douglas and Dalbeattie to existing infrastructure are approximately 1.6km and 2.0km respectively. Both these locations have a wider separation distance than the alternative preferred corridor will be from settlements at Heathhall and Locharbriggs which, in both cases, are approximately 0.2km – 2.0km, depending on where the alternative route is located within the preferred corridor. In other words, parts of Dumfries could be closer to the proposed route than the existing route is to settlements at Castle Douglas and Dalbeattie.

2.1 The existing route does not cross the Upper Solway Flats and Marshes Ramsar site as he claims.

2.3 The existing route does not cross the National Scenic Area to the south and west of Dumfries.

We believe that Frank Mitchell has been badly advised on these important matters.

### **3 Needs Case**

Frank Mitchell refers to the publication of a high level assessment of their Needs Case, entitled, 'Background to Needs Case.' We take issue with this document being referred to as a high level document. To accept this definition implies, rather like an Executive Summary, that it is based upon a more substantive piece of work. In truth, all this document represent, at 10 pages long, is a statement of intent for what will be a project costing in the order of £400m. The Background to Needs Case contains no data, arguments or evaluation around which a rational debate can take place. It provides no justification for the decisions that have been taken and appears instead to be based on assumptions, some of which are likely to be out of date, thereby presenting an over-estimate of the need.

Beyond this, however, the Background to Needs Case fails to expand on why the project is needed and relies too heavily on the fact that it is included in the Third National Planning Framework (NPF3). We would point out that this framework document, which suggests the need for additional infrastructure within Dumfries & Galloway, is for indicative purposes only and does not seek to justify the need, the route, nor the fact that the need, if proven, can be best met by a new overhead line.

We look forward to seeing a full version of SPENs Needs Case at the earliest opportunity and instead of waiting for Ofgem to decide how and when such information is made available we look to SPEN, given the public opposition to this project, to make the information available as soon as possible.

### **4 Finally**

DGAP has, over several months, shaped an alternative plan that both achieves the electricity grid enhancements required in Dumfries & Galloway to meet targets set by the Scottish Government while also mitigating the blight to the region that will inevitably result if SPENs proposal, based on an overhead line approach, is pursued. Furthermore, DGAPs proposal could help unblock local opposition, thus allowing the project to proceed much sooner thereby minimising constraint payments.

DGAP believe a meeting with Frank Mitchell would prove beneficial to all parties.