

12 December 2005

David Ray
Energy Consents Unit
Scottish Executive
Meridian Court
5 Cadogan Street
Glasgow
G27AB

Dear Mr Ray

Beauly To Denny Electricity Transmission Line Planning Application

I refer to the planning application by Scottish Hydro-Electric Transmission Ltd and SP Transmission Ltd under Section 37 of the Electricity Act 1989 to construct and operate a 400k V overhead transmission line from Beauly to Denny and wish to submit the following comments on behalf of VisitScotland.

VisitScotland recognises the wider energy policy debate and understands the rationale behind the current proposals to upgrade the transmission line along this route to connect additional energy from renewable sources in northern Scotland to areas of higher demand. We welcome the plans to reduce the number of pylons on parts of the route, but are conscious that the new pylons will be significantly larger than those currently in place. As a result, we do have concerns about the overall visual impact of the new transmission line on tourism in general and more specifically, in a number of highly sensitive locations along the route, as well as the potential impact on tourism businesses in its vicinity.

Tourism is worth around £4.6 billion a year to the Scottish economy, employing around 8% of the total workforce. In a recent Attitude Survey, the quality of the scenery is the leading factor given as the reason for a visit to Scotland with 92% of our visitors describing it as an important influence on their decision. The surveys also indicate that for over 90% of visitors, the scenery exceeds their expectations which has a significant impact on repeat and referral visits. The proximity to and visibility of the pylons from some of the key tourist corridors and destinations is, therefore, of major concern, as they could detract from the visitor experience to Scotland as a whole as well as at the specific locations highlighted elsewhere in this response. If we use the figures given in the Environmental Assessment for the potential impact on tourism, it could be calculated that the transmission line proposed in this application could have an impact on Scottish tourism of over £400 million per annum which could seriously affect the current aspiration of growing tourism by 50% over the next ten years. This potential wider influence should be taken fully into account in assessing this proposal.

Our concerns relating to more specific areas are as follows:

- Within the Highland Council area, the key areas of concern are the areas of the Correyairack Pass and the Cairngorms National Park where the Environmental Assessment acknowledges there will be adverse effects. These are areas of the highest landscape value in Scotland where the economy is heavily dependent on maintaining the scenic qualities for which the area is renowned. This is particularly important in the Cairngorms area where the National Park designation reinforces the world-class quality of the landscape and environment and increases visitor expectations of an unspoilt, wilderness area. We appreciate that the proposed route will reduce the number of pylons in some areas within the National Park, but remain

concerned about the impact of the larger pylons in the Drumochter area, which is a key gateway to the National Park, and in the Laggan area, where the pylons are likely to have a detrimental impact on the area which is now branded as Monarch of the Glen Country and attracting visitors on the basis of its unspoilt, natural beauty.

- In Perthshire, we have particular concerns about the proximity of the route to the historic gardens at Drummond Castle. These gardens are amongst the most significant in Scotland and the visual intrusion of the pylons on their setting would not be acceptable. We recognise that there will be some benefits from the removal of the existing line from the southern part of the estate, but are concerned that this will not mitigate the impact of the larger pylons elsewhere. The original plans showed alternative options for the route in this area which should be given further consideration. The visual impact on the area around the Sma Glen is also of concern.
- The route through the Stirling Council area will be highly visible from a number of highly significant historic landscapes-, as well as impacting on areas of high amenity value. The route through Sheriffmuir will cut across one of the most important locations on the historic Battle Site, impacting on a major cultural heritage site and detracting from the open and unspoilt qualities of the moorland. The most serious impact is likely to be, however, on the views to and from the National Wallace Monument and the transmission line's proximity to this major heritage site. The outlook to the Monument from Stirling Castle and from the M9 to the west of Stirling with the backdrop of the Ochils is one of the most iconic and dramatic skylines in Scottish tourism, while the Monument is also a significant landmark in views up the Forth valley from the East. The scale of the pylons would make them much more visible from the surrounding area than those currently in place and would seriously detract from the spectacular setting of one of the country's most popular attractions.

The transmission line also comes very close to the starting point of one of the most popular short hill walks in central Scotland, Dumyat at the west end of the Ochils. Walking is one of the key elements of Scotland's marketing product portfolio and routes such as this which are easily accessible from some of the key cities are highly appealing to visitors in the important City/short break market. Further consideration should therefore be given to reducing the potential impact of siting a large-scale pylon so close to the main access to this walking route.

We find it surprising that the Environmental Assessment does not consider the impact on tourism businesses to be significant. There are a number of locations where there are clusters of tourism businesses in the near vicinity of the transmission line and we have received strong representation from a number of businesses in these areas, expressing their concern about the potentially detrimental impact on their viability. The potential loss of 10-15% of income, even in the short term, could have serious implications for the businesses affected, as typically these will be small or micro businesses which do not generate significant surpluses. The short term loss could result in the closure of the businesses concerned well before trading income is expected to return to normal levels. Clearly, this would be an unacceptable outcome of this application.

As tourism is one of the most important contributors to the local economy in many of the areas affected, we would suggest that more consideration should be given to mitigating against or preventing any potential adverse effects. Within the background information, there is insufficient detail on the additional cost of undergrounding the most sensitive sections of the route weighed against the potential loss to the local economy of tourism earnings over the lifespan of the transmission line. More recent developments suggest

that more emphasis may be given in the future to alternatives to wind energy, and also that undersea cabling options or less environmentally detrimental and costly methods of undergrounding the cables have become more viable. It may, therefore, be premature to reach a decision on this application until future requirements are clearer and a wider range of options has been more fully explored".

In conclusion, while we acknowledge the rationale behind the current proposals to construct an overhead transmission line from Beaully to Denny, VisitScotland does have serious concerns about its potential impact on tourism which is one of the most important contributors to the local economy in the areas affected by the proposals. Further consideration of the issues raised in this response is required to ensure that any development to meet the government's renewable energy targets is fully sustainable.

We trust these issues will be taken into account in determining this application.

Yours sincerely

Riddell Graham
Director of Strategy, Partnerships & Communications