

Energy Consents Unit

5 Atlantic Quay

150 Broomielaw

Glasgow

G2 8LU

12th January 2021

Dear Sir / Madam

The Galloway and Southern Ayrshire UNESCO Biosphere Partnership Board are writing to object to the Kendoon to Tongland Reinforcement (KTR) proposals as submitted by Scottish Power Electricity Networks (SPEN) under references ECU00002124, ECU00002125, ECU00002126, ECU00002127 and ECU00002128.

The Biosphere Partnership Board are disappointed that despite having engaged with SPEN in previous consultations between 2015 and 2017 during which strong representation was made as to the importance of the UNESCO Biosphere designation, SPEN have again failed to either consult with the Biosphere Partnership on the current planning proposals or to adequately acknowledge the international relevance of the UNESCO Biosphere designation.

Context of Galloway and Southern Ayrshire UNESCO Biosphere

Galloway and Southern Ayrshire UNESCO Biosphere has been recognised internationally as a world class environment for people and nature.

The UNESCO Biosphere has a Partnership Board comprising representation from public, private, community and NGO's who guide delivery of the Biosphere Strategic Plan.

In addition, it has 370+ Biosphere Proud Supporters consisting of businesses, organisations and individuals who are all committed to the Biosphere ethos of "Benefiting people and nature".

The UNESCO Biosphere designation is international recognition of the fantastic array of landscapes, wildlife, cultural heritage and learning opportunities that SW Scotland offers for communities, businesses and visitors to experience and celebrate in a sustainable way.

Whilst UNESCO Biospheres are non-statutory designated areas our Biosphere is given statutory support through the Development Plan of each of the three local authorities that make up the designation; the East Ayrshire LDP (2017), the South Ayrshire LDP (2014) and the Dumfries and Galloway LDP2 (2019). This confirms the support of all three planning authorities to the Biosphere

Designation. In particular, it should be noted that the D&G LDP2 through policy ED10 states that 'development must be appropriate to the role of the different zones of the Biosphere'.

Biosphere are nominated by national government, and remain under their jurisdiction but are awarded the Biosphere Designation by UNESCO. Whilst they have no regulatory control they are governed by a form of "soft law" in that all member states of UNESCO have committed to applying and respecting the Statutory Framework for Biosphere Reserves.

The nomination process, for Galloway and Southern Ayrshire Biosphere included a signed commitment from NatureScot (formerly Scottish Natural Heritage), Forest and Land Scotland (formerly Forest Enterprise) and the three local authority partners (South Ayrshire Council, Dumfries and Galloway Council, East Ayrshire Council) to recognise and support the objectives of the UNESCO Biosphere designation.

That nomination was formally approved by Scottish Government and UK Government before being considered by the UNESCO MAB secretariat and the MAB International Cooperation Council who ultimately awarded the designation in July 2012.

The Statutory Framework for the World Network of Biosphere Reserves 1995 states that for an area to qualify for the designation;

*It should encompass a mosaic of ecological systems representative of major biogeographic regions, including a **gradation of human interventions**.*

It should be of significance for biological diversity conservation.

It should provide an opportunity to explore and demonstrate approaches to sustainable development on a regional scale.

It should have an appropriate size to serve the three functions of biosphere reserves,

It should include these functions, through appropriate zonation, recognizing:

- (a) a legally constituted core area or areas devoted to long-term protection, according to the conservation objectives of the biosphere reserve, and of sufficient size to meet these objectives;*
- (b) a **buffer zone** or zones clearly identified and surrounding or contiguous to the core area or areas, where **only activities compatible with the conservation objectives** can take place;*
- (c) an outer transition area where sustainable resource management practices are promoted and developed.*

Maintenance of the UNESCO Biosphere status is dependent on a 10 years Periodic Review demonstrating continued delivery and adherence to the Statutory Framework.

KTR Development Proposal

As already noted the UNESCO Biosphere is given statutory support through the Development Plans of each of the three local authorities that make up the designation; the East Ayrshire LDP (2017), the South Ayrshire LDP (2014) and the Dumfries and Galloway LDP2 (2019). This confirms the support of all three planning authorities to the Biosphere Designation. In particular, it should be noted that the D&G LDP2 through policy ED10 states that 'development must be appropriate to the role of the different zones of the Biosphere'.

The proposed KTR Development runs through two zones, the Transition Area of the Biosphere from Polquhanity to the Queensway where it then enters the Buffer Zone through to Mossdale, where it once again enters the Transition Area through to its terminus at Tongland.

The Buffer Zone of the Biosphere is 845 sq km and largely comprises (86%) Galloway Forest Park (held in public ownership) with some smaller privately owned areas of forestry and agriculture. Within that area are nine SSSI's and three SAC's. The Buffer Zone is also recognised internationally as a Dark Sky Park.

Within the Buffer Zone, The GSAB Partnership Board are supportive of low key development that supports sustainable tourism and contributes towards ecological connectivity, peatland restoration and creation of open ground habitats.

The GSAB Partnership Board are not supportive of developments in the Buffer Zone that have a negative impact on the core of the Biosphere, the ecology of the buffer or its sense of place.

This position is reinforced by The Statutory Framework for the World Network of Biosphere Reserves 1995 which states the buffer is an area "*where **only activities compatible with the conservation objectives can take place.***"

The Transition Area of the Biosphere covers 4314 sq km and comprises a mix of settlements, agriculture, forestry and woodland. Within that area are 82 SSSI's, 11 SAC's, 2 SPA's and 1 RAMSAR.

The transition area is where most settlements occur and communities recognise and value their Sense of Place. The Transition zone also contains national and regional designations safeguarded in UK/EU law and by policies in the Local Development Plan.

The GSAB Partnership Board supports sustainable development within the Transition Area that adheres to relevant local development plans, can demonstrate community support and applies appropriate habitat mitigation where relevant.

The GSAB Partnership Board are not supportive of developments in the Transition Area that have a negative impact on the core or buffer of the Biosphere, or its Sense of Place.

It is the view of the Biosphere Partnership Board that the proposed developments from the Queensway to Mossdale will have a significant negative impact on the Buffer zone and purposes for which the UNESCO Biosphere designation was awarded. Further the proposed developments go against the Biosphere Partnership Board Position statement for developments appropriate to the Buffer and Transition zones of the UNESCO Biosphere.

Biodiversity

Despite the EIA suggesting negligible impacts to nightjar, this does not appear to be backed up by any sound evidence and as such we have significant concerns regarding the proposed new developments. The southern section runs directly through the main nightjar zone in Bennan forest (located in the buffer of the UNESCO Biosphere) and as such a new structure dissecting this population will pose a significant risk to foraging and displaying birds within this area. Whilst Nightjar have recently been down-listed from red to amber status in Birds of Conservation this is due to their population increase in England. However, this increase has not been matched by an increase in its UK range into Scotland. Dumfries and Galloway supports 95% of the Scottish population and is therefore at the front-line of any future range expansion. Since the buffer of the Biosphere (Galloway Forest Park -Bennan and Laurieston) supports fifty percent of the Dumfries and Galloway Nightjar population it is a key area for ensuring future recovery and expansion of Nightjar in southern Scotland.

We are further concerned about the potential impact on raptors particularly peregrine, goshawk, osprey, hen harrier, golden eagle, honey-buzzard, red kite and barn owl and disturbance caused both during construction and by the presence of over headlines during the operational period.

We'd also like to have assurances that whether over head or underground due regard will be taken of key bryophyte communities that are in the vicinity of the proposed route.

We note that the EIA indicates the removal of 42.37ha Ancient Semi Natural Woodlands (ASNW) and Plantations on Ancient Woodland Sites (PAWS) which are identified as priority habitats in the D&G Biodiversity Action Plan and in the UNESCO Biosphere Natural Heritage Management Plan. Given the national importance and significance of ASNW's and PAW's Sites the Biosphere Partnership Board support Scottish Forestry's position that is not acceptable to see these habitats lost.

Tourism

One of the key drivers for tourism in SW Scotland is our landscapes and wildlife which act as a backdrop to the many businesses that rely on the tourism economy.

Data for 2019 demonstrates how essential tourism already is to our region's economy (value of £609m, 4.6m visitors, c. 9,800 direct jobs and 12,000 total employment) and with the recent

investment outlined below we now have a huge opportunity to realise the region's full tourism potential.

The new South of Scotland Enterprise agency has recently announced investment of £2.1m in the setting up of the South of Scotland Destination Alliance tasked with marketing and promoting the South of Scotland both nationally and internationally.

The South of Scotland Enterprise agency has also recently announced an investment of £1.9m to the UNESCO Biosphere to enable the team to expand its capacity and ability to promote sustainability opportunities to businesses, organisations and individuals in SW Scotland. A key element of that is focused on raising the profile of UNESCO brand and its 'world class' associations in the marketing and promotion of SW Scotland.

Aligned to this the Scottish UNESCO Trail was identified in **The Government's Programme for Scotland 2019-20** as a priority. The Digital Trail links thirteen designated UNESCO sites in Scotland including Galloway and Southern Ayrshire Biosphere;

- To increase the value of visitors to the sites.
- To encourage geographical spread of visitors to the different regions.
- To engage with and involve local communities.
- To promote the UNESCO values.
- To apply sustainable tourism policies to contribute towards the Sustainable Development Goals.

Galloway Forest Park and the Galloway Dark Sky Park are both premier tourism attractions for the region. The landscape impact of overhead lines will on tourist routes such as the Queensway and Raiders Road, not to mention the many foot and cycle paths will adversely affect its reputation for a more naturalistic landscape.

Loch Ken Trust is a recently created a new constituted body that will be promoting the tourism and community opportunities both on the loch and in the surrounding environs. Located in the heart of our UNESCO Biosphere the KTR proposals will have a significant detrimental impact on the opportunities to promote the naturalistic landscapes of the Glenkens area.

Tourism is a vital mainstay of the economy in SW Scotland and all the evidence is that post Covid it will rise exponentially in the region. Many local communities are looking to sustainable tourism as a key means of creating new opportunities and supporting their local services and infrastructure. It essential that we do not undermine this opportunity through inappropriate development.

In stating a preference for overhead lines SPEN say;

"It is acknowledged by SPEN that the underground option is, in each case, technically feasible and, on balance, environmentally preferable having regard to landscape and visual as well as forestry

impacts. Nevertheless, the environmental benefits must also be balanced against the additional costs involved.” It should be noted the SPEN include tourism in the “environmental benefits”

The Biosphere Partnership believes that greater value should be placed on these environmental benefits as they are in other parts of the UK (National Parks) and Europe. Greater consideration should be given to the balance between the upfront installation costs and the potential for negative economic impacts on Tourism over the proposed 40-year lifetime of the overhead options.

In summary the Galloway and Southern Ayrshire Biosphere Partnership objects to this proposal and believes that the higher up front economic cost of under grounding the proposed KTR development is justified when compared against the long term landscape, habitat, biodiversity negative impacts to our tourism economy during the 40-year life span of the project.

Yours Sincerely



Joan Mitchell

Chair Galloway and Southern Ayrshire Biosphere Partnership