SP ENERGY NETWORKS

The Dumfries and Galloway Strategic Reinforcement Project

Appendices to Summary of Feedback from 2015 Consultation

July 2016

Appendix A: Summary of responses from statutory consultees

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This appendix contains SPEN's specific responses to feedback raised which is relevant to the *Kendoon to Tongland 132kV Reinforcement (KTR) Project* as defined within paragraph 2.2.7 of Chapter 2.

Consultee	Issues Raised	SPEN Response
Dumfries and Galloway Council Planning Applications Committee Response	1. The present statement of why the project is needed is inadequate and relies too heavily on the fact that it is included in NPF3. The Council would expect SPEN to publish the Need Case for the project as soon as possible and certainly in advance of the 2nd public consultation. 2. The Council would expect SPEN to take into account the views of local communities likely to be impacted by the route / options and to include residential amenity in their assessment. 3. The Council would expect SPEN to more fully detail the economic impact, both positive and negative, of their proposals, with reference to the Council's Regional Economic Strategy. Information on future maintenance (including health and safety issues) should be addressed. 4. The Council would expect SPEN to take full account of the importance of the regional landscape quality of Dumfries & Galloway, and to give cognisance to the Council's Landscape Character Assessment (plus associated guidance within the Dumfries and Galloway Wind Farm Landscape Capacity Study) as the Council considers that it is insufficient to refer only to national and European designated areas as key landscape constraints.	1. The project already enjoys national development status within NPF3 and as such the need has been established. The statement of need on page 74 of NPF 3 confirms that new and/or upgraded onshore transmission infrastructure of or in excess of 132kV is needed to support the delivery of an enhanced high voltage electricity transmission grid which is vital in meeting national targets for electricity generation, statutory climate change targets and security of energy supplies. Through the development of the project, we have considered a range of strategic options which have been filtered (balancing environmental, technical and economic criteria) into a smaller subset which has been subject to a more detailed cost-benefit analysis (CBA) 2. This report sets out how we have taken account of feedback received from local communities during the first round of consultation. In addition to settlements already mapped and avoided during the corridor identification and appraisal stage, individual residential properties will be mapped and will be used to inform line route identification and appraisal. 3. We appointed a consultant to help us appraise, at a high level, some of the wider socio-economic effects associated with the options which have been taken into detailed cost-benefit analysis.

	5. With regard to the above, the Council expects SPEN to adopt all possible mitigation to avoid any adverse impact on the region's sensitive landscape areas, including undergrounding and other routeing options, such as undersea routeing. 6. At this stage, the Council expects SPEN to have an open mind on alternatives other than just the route corridor options shown in their consultation, and to fully assess and appraise options at this early stage rather than ruling them out. There is insufficient justification at this early stage for SPEN's preferred corridors and the Council would urge them at this stage to undertake a fully open and transparent options appraisal. 7. The Council requests that SPEN allow sufficient periods of time for the submission of comments during the second and third phases of public consultation and that the consultations should be undertaken in accordance with the National Standards for Community Engagement.	The key socio-economic indicators assessed include employment, expenditure, amenity and carbon. The outputs of the socio-economic appraisal have been applied in a sensitivity testing exercise to highlight the wider socio-economic considerations for each reinforcement option considered. This has included consideration of the potential socio-economic effects of the project across a range of areas that may arise during both the construction and long term phases, and assessing any impact on tourism and recreation, while considering local amenity issues. Further to this, once the project progresses and further details are available, a full socio-economic impact study will be carried out as part of the project Environmental Impact Assessment (EIA) and detailed in the resulting Environmental Statement. We are committed to fully engaging with the Council in this area as the project progresses. 4. The corridor appraisal considered Regional Scenic Areas (RSAs), in the identification of preferred corridors. The corridor appraisal also took account of the capacity of the landscape to accommodate the type of development proposed. The capacity study was informed by the council's Landscape Character Assessment and the Wind Farm Landscape Capacity Study. 5. As stated in the response to 1), environmental impact is a key consideration in the proposals that are being taken forward. Our document *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment* explains the process we go through to identify and appraise potential areas for overhead lines and the stage at which we might consider

		alternative options such as undergrounding. In addition, SPT Transmission plc, which is a wholly owned subsidiary of SPEN and as the holder of a transmission licence, has a duty under Schedule 9 of the Electricity Act 1989, when putting forward proposals for new electric lines and other transmission development, to have regard to the desirability of the preservation of amenity, the natural environment, cultural heritage, landscape and visual quality, as well as the effect of works on communities. 6. Ofgem will evaluate our assessment of strategic options as part of our project submission. SPEN has published more detail on this process under the *Project Need Case* tab at www.spendgsr.co.uk. The council has stated that insufficient justification for the preferred corridors has been provided but it has not identified the information which it considers has been omitted. It would be helpful if this could be specified for those corridors which are to be taken forward. 7. SPEN attaches great importance to the effect that its works may have on the environment and on local communities. In seeking to achieve 'least disturbance', SPEN is keen to engage with key stakeholders including local communities and others who may have an interest in the project. This engagement process begins at the early stages of development of a project, and continues into construction once consent has been granted. As a minimum, SPEN will undertake all consultation rounds in line with specific good practice guidance as provided by the Scottish Government.

Environment Agency	Zone 6b: 1. No objection to D/H 1 as the preferred option. The applicant is advised to liaise with EA further as the EIA scoping report is developed especially regarding the identification of the designated main rivers and the flood risk constraints. 2. There are two County Wildlife Sites (non-statutory local wildlife sites) in the south-west corner of Zone 6b that should be avoided if possible. It is understood that these sites are not included as 'areas of highest environmental value' however they are of biodiversity value and as they are both on peat probably not ideal sites for the construction of towers. 3. Note that the boundary of Bolton Fell Moss/Walton Moss SSSIs is being changed. Natural England should be contacted for further information. 4. Parts of the River Esk channel within corridor D/H1 have significant bank erosion and potential for significant channel movement which may need to influence the exact location of some towers. 5. The proposed new route for overhead cables does not cross any current permitted landfill sites. 6. The gravel pits North of Longtown at Oakbank Farm were licensed for deposit of inert wastes.	The Environment Agency is thanked for its comments which have been considered and will be retained for future reference. No part of the KTR Project is being carried out in England.

	7. Peth Quarry landfill was granted a resolution under CoPA 1974 for the deposit of domestic, commercial and industrial wastes. Foundations for supporting electric towers should avoid siting on the landfill to prevent potential for pollution of the Warren burn and River Esk. 8. The proposals do not indicate that the Harker substation will be affected. However, any change of plan for substation demolition/reconstruction will require a desk study, ground investigation, risk assessment and clean-up, as necessary.	

Historic England	1. General comments provided on Scheduled Monuments (SMs) and Listed Buildings (LBs). 2. Recommended consultation with Conservation Officer at Carlisle City Council and also the County Archaeology Service at Cumbria County Council for designated and non-designated heritage assets. 3. Frontiers of the Roman Empire (Hadrian's Wall) WHS: • Concerns about visibility of overhead line from the Wall, and about the overhead line crossing the line of communication between the line of Hadrian's Wall at Stanwix (Carlisle) and Roman fort at Netherby near Longtown. • Potential impact on the setting of the World Heritage Site (WHS). Aspects of the area surrounding the physical remains of the Roman frontier which provides part of its significance. • HE confirm would not oppose a new overhead line along preferred corridor on the ground of its impact on Hadrian's Wall WHS. 4. Scheduled Monuments: Scaleby medieval castle – the construction of a new overhead line to the west would represent a change to the landscape which could harm the understanding and appreciation of the castle's role (as a first line of defence against Scottish incursion), and therefore the significance of the site. Recommend setting of this site by subject to detailed assessment using HE guidance.	Historic England is thanked for its comments which have been considered and will be retained for future reference. No part of the KTR Project is being carried out in England.

	5. Listed Buildings: Potential impact of proposal on the settings of these buildings, either within or close to the preferred corridor. Buildings include the church at Kirklington that lies within the corridor, the church at Arthuret which lies one mile to the east, Brackenhill Tower which lies just outside this area, and the listed structures within the moated site at Scaleby. 6. Solway Moss Registered Battlefield: No concerns related to the corridor on the basis of routeing to the east of the Battlefield and not the west. However HE ask that the detailed designed stage takes into account the desirability of reducing, where possible, the visibility of the line from within the registered battlefield. 7. Frontiers of the Roman Empire (Hadrian's Wall) WHS: • Concerns about visibility of overhead line from the Wall, and about the overhead line crossing the line of communication between the line of Hadrian's Wall at Stanwix (Carlisle) and Roman fort at Netherby near Longtown. • Potential impact on the setting of the World Heritage Site (WHS). Aspects of the area surrounding the physical remains of the Roman frontier which provides part of its significance. • HE confirm would not oppose a new overhead line along preferred corridor on the ground of its impact on Hadrian's Wall WHS.	

	8. Scheduled Monuments: Scaleby medieval castle – the construction of a new overhead line to the west would represent a change to the landscape which could harm the understanding and appreciation of the castle's role (as a first line of defence against Scottish incursion), and therefore the significance of the site. Recommend setting of this site by subject to detailed assessment using HE guidance. 9. Listed Buildings: Potential impact of proposal on the settings of these buildings, either within or close to the preferred corridor. Buildings include the church at Kirklington that lies within the corridor, the church at Arthuret which lies one mile to the east, Brackenhill Tower which lies just outside this area, and the listed structures within the moated site at Scaleby. 10. Solway Moss Registered Battlefield: No concerns related to the corridor on the basis of routeing to the east of the Battlefield and not the west. However HE ask that the detailed designed stage takes into account the desirability of reducing, where possible, the visibility of the line from within the registered battlefield. 11. Frontiers of the Roman Empire (Hadrian's Wall) WHS: • Concerns about visibility of overhead line from the Wall, and about the overhead line crossing the line of communication between the line of Hadrian's Wall at Stanwix (Carlisle) and Roman fort at Netherby near Longtown.	

	• Potential impact on the setting of the World Heritage Site (WHS). Aspects of the area surrounding the physical remains of the Roman frontier which provides part of its significance. • HE confirm would not oppose a new overhead line along preferred corridor on the ground of its impact on Hadrian's Wall WHS. 12. Scheduled Monuments: Scaleby medieval castle – the construction of a new overhead line to the west would represent a change to the landscape which could harm the understanding and appreciation of the castle's role (as a first line of defence against Scottish incursion), and therefore the significance of the site. Recommend setting of this site by subject to detailed assessment using HE guidance. 13. Listed Buildings: Potential impact of proposal on the settings of these buildings, either within or close to the preferred corridor. Buildings include the church at Kirklington that lies within the corridor, the church at Arthuret which lies one mile to the east, Brackenhill Tower which lies just outside this area, and the listed structures within the moated site at Scaleby. 14. Solway Moss Registered Battlefield: No concerns related to the corridor on the basis of routeing to the east of the Battlefield and not the west. However HE ask that the detailed designed stage takes into account the desirability of reducing, where possible, the visibility of the line from within the registered battlefield.	

Forestry Commission Scotland (FCS)	Where possible, FCS would ask that woodland areas are avoided (it is recognised however that due to other constraints that this will not always be possible). Where the wayleaves do interact with trees and woodlands then care needs to be taken with regard to the detailed alignment and siting of the route to minimise the impacts on woodland interests. Examples of relevant factors would be the protection of existing windfarm edges to crops and avoidance of higher environmental and landscape value areas within woodlands (such as riparian corridors). Where possible, routes which align with, or at least most effectively utilise, existing roads and tracks would be beneficial in minimising further woodland loss and in reducing the need for extensive new track construction. Felling approval should only be sought through the energy consents/Section 37 process for trees within the wayleave itself. Broader felling works which may be felt necessary to address wider land management issues which arise from these works (such as addressing the risk of windblow) should seek consent through the normal regulatory process of the Forestry Act. It would however be appropriate to reflect such wider impacts within the ES, but not seek consent for such works through that mechanism. Land within woodlands which will be released as a result of decommissioning of the existing wayleaves, should be considered for replanting as a potential mitigation for woodland losses associated with the new wayleaves.	Feedback from FCS is noted and will, where appropriate, inform the methodology for taking account of woodland at the line routeing stage and subsequent EIA.

	It may also be worthwhile to consider wider region-wide mitigation works associated with trees. Highlights an initiative which has just commenced within the Scottish Borders, details of which are here: http://www.tweedforum.org/btpg SPEN may wish to reflect on this as a way of allowing communities and individuals to help enhance the landscape of D&G in mitigation for the impacts that these new wayleaves will have.	
Scottish Environment Protection Agency (SEPA)	SEPA noted they are content with the approach taken and highlighted a number of key issues to be addressed prior to submission of the application. Impacts on peat and groundwater dependent terrestrial ecosystems (GWDTEs) should be considered in the decision on the preferred route. Existing infrastructure should be used where possible and all new proposed infrastructure should be shown on plans and assessed as part of the EIA. Most important (from a SEPA perspective) will be minimising impacts on areas of GWDTEs, watercourses and areas of deep peat. Also necessary to indicate how disturbed peat and forest waste will be managed and reused on site.	Data on GWDTEs can only be collected through field survey, which is not feasible for the size of this project at the corridor identification and appraisal stage. GWDTEs will be considered at the design and EIA stages of the project whereby infrastructure will be designed to minimise effects on GWDTEs and survey methods will follow those set out by SEPA. In relation to hydrology/watercourses we will undertake a full hydrological assessment on the proposed works as part of the EIA. This will allow us to identify any potential receptors, such as watercourses and private water supplies, and develop appropriate mitigation to negate any potential effects. Potential forest and peat waste will be managed and used on site where possible in accordance with best practice in consultation with SEPA, FCS and Scottish Natural Heritage (SNH). In relation to peat, at the line routeing stage, SNH's consultation draft paper on carbon-rich soils will be used to identify areas of peat (carbon rich soils). These areas will also be used to inform the appraisal of line route options with the aim of avoiding siting new infrastructure on areas of deep peat. Peatland habitats will continue to be considered as part of Phase 1 Habitat/NVC surveys at EIA stage.

	1/200yr flood extent areas should have minimum infrastructure sited within it where possible. Require all substations to be located outside the 1/1000yr flood extent. All the substation siting areas look to be satisfactory.	SPEN will review the potential implications of siting a substation in the 1/1000yr flood extent zones as part of the design stage.
	Recommend inclusion of a decommissioning plan for the redundant transmission infrastructure. Highlight a number of surveys and assessment parameters required to be undertaken as part of the later EIA stage.	We note the surveys and assessments recommended by SEPA and these will be considered, in consultation with SEPA, at the scoping stage of the EIA.
South Ayrshire Council	Zone 1: Auchencrosh to Newton Stewart, including the proposed substation in the Auchencrosh area: 1. The preferred corridor A/NS 2 would be the least environmentally damaging of the options considered although it is recognised that this is still likely to have significant landscape and visual impacts some of which may be mitigated to some degree with careful routeing. It is assumed that the line will be routed largely within the forestry area and aligned to take advantage of screening and landform to minimise the visual effects from local roads and local communities. This routeing should seek to avoid the setting of the scenic area in the Drumlamford area and be sited west of Loch Maberry. 2. The preferred substation site A3 is confirmed as the preference and would appear to minimise environmental effects when compared with other options. However there is insufficient detail on the likely appearance of the proposed substation and further information on the components of the substation and the connection to the existing 275kV line would be useful to identify potential landscape and visual impacts.	South Ayrshire Council is thanked for its comments which have been considered and will be retained for future reference. No part of the KTR Project is being carried out in South Ayrshire.

	3. The new 400kV transmission will inevitably have significant adverse landscape and visual effects but these may be able to be mitigated to some degree by routeing the line to avoid being visible on sensitive skylines containing the Duisk Valley. 4. Careful routeing will also be necessary to avoid impacting on the setting of the South Ayrshire Scenic Area in the Drumlamford area. It is assumed that the line will be routed largely within forestry and would be aligned to take advantage of screening provided by landform and forestry to minimise effects on views from roads and more sensitive landscapes. 5. Cumulative effects in views from the A714 could be significant if the line was seen in conjunction with the Arecleoch and Kilgallioch wind farms. Woodland planting undertaken close to this road should be considered as a possible mitigation measure. 6. Future consultation material should recognise the significance of the Galloway & Southern Ayrshire Biosphere boundaries.	
Historic Environment Scotland	Recommend consultation with the relevant authorities' local archaeological and conservation services. Substation siting areas: 1. Newton Stewart: NS5 – Challoch Church identified as a key consideration as the setting of the church makes a strong contribution to its significance and is sensitive to change. HES consider NS5 would have a more significant impact than the other siting areas. It is recommended that	We will continue to liaise with Dumfries and Galloway Council and its archaeological advisors as the KTR Project progresses. Substation siting areas: 1. This part of the project is not being taken forward at this time. However all comments are noted and will be retained for future reference. 2. The setting of Barscobe Castle will be taken account of during the line routeing stage.

	development to the north of NS5 is avoided. 2. Glenlee: Appraisal of G3 should consider the potential impact on Barscobe Castle which lies within 2km. 3. Dumfries: Recommend Carnsalloch listed buildings (x3) are considered as a group as a potential key consideration. Lincluden Church identified as a LB is also a SM. Corridor options: • Auchencrosh – Newton Stewart: Scheduled crannogs at Loch Maberry and Loch Ochiltree identified as potential key considerations. • Kendoon – Glenlee: It should be noted that Earlstoun Castle, which is a listed building and SM lies within the corridor, rather than close to it. • Glenlee – Tongland: SMs highlighted as potential key considerations at this stage include Bargatton Farm, cairn 610m S of and Edgarton Mote, fort 690m SW of Camelon Bridge. The SM Craig Hill, fort, Laurieston may also form a key consideration. • Glenlee Dumfries: The following scheduled monuments highlighted as potential key considerations at this stage - Sundaywell, fort 300m N of (Index no. 5556), Moatland, motte (Index no. 700), Moat, enclosure 300m NW of (Index no. 4955) • Two additional category A listed buildings should also be considered: Ellisland Farmhouse and Steading (HB Num 4232) and West Galloberry Farm Steading and Horsemill (HB Num 10218).	3. We welcome the identification of a number of cultural heritage features as being 'key considerations'. The areas mentioned are not affected by the revised project. Corridor options: We welcome the identification of a number of inventory gardens and designed landscapes and cultural heritage features as being 'key considerations'. Those which are relevant to the KTR Project will be highlighted within the line routeing methodology to inform the appraisal of options.

	• The listed building Fourmerkland Tower (HB Num 10204) is also a scheduled monument (SM) (Index no. 692). • In the non-preferred route options, the following additional SMs are potential key considerations at this stage - White Cairn, cairn, Corriedow Bridge (Index no. 1047), Carzield, Roman fort (Index no. 673). • The Twelve Apostles, stone circle (Index no. 641) SM should be named as a key consideration in both the substation siting area and corridor appraisals. • A number of inventory gardens and designed landscapes (GDLs) within 2 km of the non-preferred route options should be identified as key considerations. For options G/D 1 and G/D 2 this applies to Maxwelton (Glencairn Castle), and for options G/D 5 and G/D 6, it is recommended that the GDL known as Brooklands is identified as a key consideration. • Dumfries – Harker (only refers to the part of the route which is in Scotland): All Category A listed buildings should be noted as potential key considerations. Repentance Tower, which is a listed building (HB Num 3570) and SM (Index no. 706), may form a key consideration for both the preferred and non-preferred options.	
Carlisle City Council	1. Issues are very similar to those affecting the National Grid North West Coast Connections (NWCC) project:	Carlisle City Council is thanked for its comments which have been considered and will be retained for future reference. No part of the KTR Project is being carried out in Carlisle.

	2. Concern is the change in scale of the towers and how that can be mitigated either ensuring a rationalisation of any lines or possible under grounding. The latter of course has other issues relating to archaeology but both have concerns relating to the AONB. 3. There are also concerns about the integration of the two projects at Harker and the potential cumulative effects. 4. In addition it is recognised that this is nevertheless an important project and assuming these matters can be dealt with, the Council would want to ensure that local people and supply chains are utilised along with the opportunity to enhance the skills base locally.	
Scottish Natural Heritage (SNH)	Protected Areas: Due protection has been given at this stage to internationally and nationally important protected areas. Detailed bird surveys may identify some connectivity with sites where wildfowl interests are travelling significant distances beyond site boundaries to feed. The fitting of bird flight deflectors may need to be considered where any potentially significant collision risk is identified. Particular attention should be paid in this regard to any risk to the red kite population and other important protected species (information redacted) in Dumfries and Galloway. Welcome the proposed removal of the existing 132kV lines running through and adjacent to Loch Ken & River Dee Marshes SPA/SSSI and Upper Solway Flats & Marshes SPA/SSSI which should lessen the collision risk to wildfowl.	Protected areas: In relation to ornithological connectivity, the project's *Routeing and Consultation Document* sets out how the corridors were appraised with regard to sites known to have connectivity with the ornithological qualifying interest of designated sites, including feeding areas used by barnacle geese and pink-footed geese from the Inner Solway Flats and Marshes Special Protection Area (SPA) and Greenland white-fronted geese from the Loch Ken and River Dee Marshes SPA. As a result, for barnacle geese and Greenland white-fronted geese, the preferred corridor largely avoids habitual feeding areas, and the main flight routes between feeding areas and the SPAs. In respect of pink-footed geese, the preferred corridors avoid many areas known to be frequented by feeding geese. However, their more dispersed and less habitual feeding areas will require information from baseline field

		surveys to identify any regions of relatively high flight activity between these areas and designated sites. This also applies to other species of conservation concern in the wider countryside. Where collision risk may lead to potential adverse effects on these populations, bird flight diverters provide an opportunity to mitigate these effects; hence, these issues will be addressed at the EIA stage. Red kite communal winter roosts will be taken account of during the line routeing stage and other species of high/moderate conservation concern will be considered during the alignment/EIA stage. In respect of other important species, confidential nest data and flight information has been made available to the project ornithologist and will be considered at the line routeing/appraisal and subsequent EIA stage where geographically relevant.
	Landscape and visual: The methodology adopted to consider landscape and visual impacts is appropriate for this stage of the project. Reference to landscape character assessments is appropriate; though recommend that a specialised capacity study is undertaken for refining the selection of route alignment and substations. Would welcome the examination of opportunities for undergrounding where more detailed assessment shows overhead lines giving rise to significant landscape and visual impacts.	Landscape and visual: These comments are noted. Consideration will be given to the ability of Landscape Character Units (LCU), which are geographically defined sub-sections of landscape character types, to accommodate an overhead line at the line routeing and appraisal stage. In relation to undergrounding, should the iterative routeing process not identify a suitable continuous overhead line that meet the KTR Project objective, in accordance with our approach to routeing, we will make a clear and transparent decision on the next step.

	National Scenic Areas and Wild Land Areas: The preferred corridors avoid crossing any National Scenic Areas and the Merrick Wild Land Area. More detailed assessment will be required to confirm the level of impact where the new line is visible from these areas.	National Scenic Areas: These comments are noted. Potential effects associated with visibility of the overhead line from NSAs will be considered at the EIA stage.
	Regional Scenic Areas: Regional Scenic Areas (RSAs) will be affected by a route through the preferred corridors, in particular South Ayrshire, Galloway Hills, Thornhill Uplands, Terregles Ridge, Torthorwald Ridge and Solway Coast RSAs. The cumulative landscape and visual impact on each RSA will need to be assessed. Recognise that that it would be difficult for any corridor to avoid impacts on RSAs altogether, and that the preferred corridors attempt to minimise the proximity to RSA's. Some of the substation siting areas have the potential to impact on RSAs and will require careful assessment. The substation siting area A3 covers part of Glen Tig, an area of medium landscape capacity within the South Ayrshire Scenic Area. The potential impact of this substation in combination with Arecloech, Altercannoch and Cowar wind farms should be assessed. Many of the substation siting areas eg. (but not exclusively) NS5, G2 and D4 fall in areas of medium to lower landscape capacity close to or within Galloway Hills and Torthorwald Ridge RSAs respectively and will be particularly sensitive.	Regional Scenic Areas: These comments are noted. The RSAs relevant to the KTR Project will continue to inform the identification and appraisal of line routes and potential effects on the RSAs will be assessed as part of the subsequent EIA. Potential substation sites, and their relative effects on RSA and scope for mitigation, will be carefully considered at the appraisal and EIA stage. Landscape capacity will be taken account of during the line routeing stage at the LCU scale.

	Tourist routes: The preferred route corridor crosses a number of key tourist routes, including the Southern Upland Way, Annandale Way, Galloway Tourist Trail, Burns Heritage Trail, Robert Bruce Trail, Telford Trail, Galloway Kite Trail and the National Cycle Network. Galloway Forest Park including the Buffer area of the Biosphere, the Dark Sky Park and key trunk roads through Dumfries and Galloway will also be affected. The further assessment of visual impacts should consider the perspective of a moving observer as well as static viewpoints, and consider full sequential impact assessments for the routes most significantly affected.	Tourist Routes: Tourist routes/trails have been mapped and considered at the corridor appraisal stage, to minimise visual effects on tourists as far as possible. Further consideration at the line route identification and appraisal and subsequent EIA stage will also be given to tourist routes. The EIA will also include a visual assessment which includes a sequential assessment and key static viewpoints along tourist routes which may be affected by the KTR Project .
	Landscape and visual impact assessment (LVIA): 1. The LVIA needs to examine impacts on landscape character. 2. Detailed routeing and impact assessment should be informed by an analysis of the visual envelopes of settlements and sequential (and overlapping) visual envelopes along corridors, combined with the ZTV of the line. 3. Appropriate construction and programming information should be included to enable all impacts to be assessed (e.g. for substations, compounds, borrow pits, access tracks). 4. Visualisations should be used to test and refine the routeing. The range and number of viewpoints used should be identified even if all are not included as photomontages. Other tower lines and prominent structures (such as masts and wind farms) should be included in visualisations to assess cumulative effects of all vertical structures.	Landscape and visual impact assessment (LVIA): 1. These comments are noted. The LVIA will consider effects on landscape character. 2. The LVIA will include detailed Zone of Theoretical Visibility (ZTV) and an analysis of how the ZTV relates to settlements/ sequential effects from key routes. 3. These comments are noted. Details on construction and programme will be included in the LVIA. 4. A Topos model and 3D visualisations are being prepared to support the appraisal of detailed routes. The LVIA will also be supported with detailed photomontages from key viewpoints, to be agreed with statutory consultees. The scope of the cumulative assessment, including unbuilt schemes to be including in the visualisations and assessment will also be agreed with statutory consultees.

	5. The approach to individual tower siting should be described. 6. The impacts of the wayleave and maintenance access should be taken into account.	5. These comments are noted. 6. These comments are noted. Landscape and visual effects in relation to wayleave and maintenance access will be taken into account during the EIA.
Dumfries & Galloway Council (Technical advisors responses)	It would be appropriate to consider the status of the LDP nearer the time of submission.	Noted.
	Landscape Architect: General Comments; 1. Initial landscape and visual assessment appear to follow a recognised approach and use a robust methodology. 2. The consultants do not refer to all landscape units potentially impacted by the preferred zones; this is a concern because different units within the same LCT can have different sensitivities and therefore potential capacity (noting the 'caveat' above). 3. It is also worth noting that proposed towers are up to 45m which brings them close to the upper threshold of the typology so comments made in relation to the medium typology should also be considered (refer to paragraph 2.5 of the Dumfries and Galloway LDP Technical Paper 'Wind Energy Interim Spatial Framework Maps' Sept 2014). The Dumfries and Galloway Windfarm Landscape Capacity Study (DGWLCS) does not assess the Small/medium typology for all landscape character types (because there was no predicted demand for smaller scale turbines in more extensive and less-settled upland regions),	Landscape Architect: General Comments 1. The comments of the landscape architect are noted. 2. Landscape Character Units (LCUs) will be mapped and their capacity to accommodate an overhead line will be appraised. LCUs will be taken account of during the appraisal of line route options and substation sites alongside the Landscape Character Types (LCTs). 3. These comments are noted.

	however where this occurs, it does include commentary on potential effects and the relevant comments have been referenced by the consultants here.	
	Zone 1, Auchencrosh to Newton Stewart, recommendations: 1. Proposed substation at A3 is outside D&G but could be set back within extensive afforestation to help screen development. 2. Zone passes through Arecleoch Forest which provides opportunities for screening. It also includes particularly attractive open areas around Loch Ochiltree which provide a contrast to extensive afforestation and consented windfarm development in other parts of the Machar Moorlands. Specific viewpoints include the minor road north of Glenruther Lodge. Suggest final routeing options avoid crossing open areas. 3. Proposed substation site at NS5 seems the most acceptable option provided that opportunities to set back within existing forestry and to screen within landforms through careful siting are taken (NB avoiding Castle Stewart non-inventory designed landscape and areas of ancient woodland). 4. Connection between the existing and proposed new substation at Newton Stewart would pass through a settled, fine-grained landscape and will require mitigation such as undergrounding.	The council is thanked for its comments relating to this zone, which have been considered and will be retained for future reference. However the KTR Project is not being carried out within Zone 1.

	5. The old substation is highly visible from the west, including from the A75 trunk road and looks out of place within the predominantly rural vista. Consideration should be given to providing additional planting to help screen this facility as part of the proposed works. Potential cumulative effects of three connectors running to the old substation will also require care. 6. Crossing the River Cree and valley to north of Newton Stewart will be particularly challenging and requires care. This is a popular walking, cycling and fishing area and is an important part of the tourism offer for the town.	
	Zone 2, Newton Stewart to Glenlee, recommendations: 1. This corridor passes through the Galloway Hills Regional Scenic Area which is designated for its sense of wildness, rugged landscapes and scenic views. As a result, the landscape is highly sensitive to inappropriate development and the line would have to be sited with extreme care (noting that proposals are to replace an existing line). 2. It also runs across a Deer Park and in close proximity to the Kirroughtree 7Staines cycling trails and forest park. These should be treated as sensitive visual receptors in development of potential routes. 3. Opportunities to remove the existing 132KV line and following the same routeing which uses landform and existing forestry as screening are welcomed as it avoids becoming too visible in views from the popular road and visitors centre at Clatteringshaws Loch.	The council is thanked for its comments relating to this zone, which have been considered and will be retained for future reference. However, the KTR Project is not being carried out within Zone 2.

	4. However the existing line runs through the settlement of Minnigaff (edge of Newton Stewart) and opportunities to amend this line or other mitigation measures such as undergrounding to avoid dominating this settled landscape should be considered. 5. The line also runs through plantation woodland of long-established origin around Cumloden Farm and there are a number of ancient woodlands within or in the vicinity of the corridor. 6. Concern re the proposed location of substation at G2; this is an open and raised area in close proximity to settlement, overlooked by surrounding uplands. Design development will require careful siting and design plus use of screening through landform and potentially planting.	

	Zone 3, Glenlee to Tongland, recommendations: 1. Removal of existing 132KV line from Glenlee to Tongland welcomed – especially crossing of Loch Ken which affects visual amenity in this high sensitivity location. 2. The corridor passes high ground to north of Cairn Edward Hill (minimum corrie height of 210m). The route from here potentially crosses between New Galloway and St John's Town of Dalry and will inevitably cross the Water of Ken, potentially close to Kenmuire Castle; this is a highly sensitive settled area with significant tourism interests and significant mitigation – potentially undergrounding - will be vital. 3. Re-routeing within forestry to west of Loch Ken, Loch Woodall and Laurieston potentially beneficial, though area around Woodall Loch and the eastern outward-facing slopes of Bennan Hill, Craig Hill and Craigelwhan are sensitive; within RSA, close to dispersed settlements and a SSSI. Two non-inventory designed landscapes lie within the narrow proposed zone. The line should be set back from Woodall Loch and the zone extended to enable consideration of potential alignments throughout Laurieston Forest to the south of Stroan Loch. Potential bird issues for flight paths to/from the Laughenghie and Airie Hills SSSI to the west (and landscape/visual impacts associated with the River Dee and Raiders Road) could potentially be mitigated by undergrounding across the gap to the west of Mossdale between afforested areas.	Zone 3, Glenlee to Tongland: 1. These comments are noted. 2. Proposed corridor G/T 2 passes to the west of New Galloway, avoiding the settlement and utilising the intervening landform and coniferous forestry plantations to the west of the Glenkens valley. Visual effects on receptors within New Galloway and the Glenkens valley will be considered during the line routeing stage. The G/T 2 proposed corridor encompasses an area of the Glenkens valley between New Galloway and St John's Town of Dalry, and does not include the area of the Glenkens valley directly south of New Galloway near Kenmure Castle (approximately 2-3km south of the proposed corridor). 3. Informed by the feedback received during the first round of consultation, we propose to widen the corridor to the west near Mossdale (where it does not encroach on areas of highest environmental value) to incorporate the Laurieston Forest. This will enable us to consider line route options within an extended corridor area. 4. to 5. The council's highlighting of sensitive visual receptors is noted and these will be mapped and taken account of during the line routeing stage. 6. These comments are noted.

	4. To the south, key sensitive receptors would include Neilson's monument at Barstobrick (popular raised viewpoint) which is within the preferred zone. Further west, Loch Menoch and Glengap are also highly sensitive landscape features. 5. Crossing of Barhill area and dropping into the valley immediately north of Tongland is challenging; this is a prominent skyline from nearby settled valleys and the valley contains the main access to Kirkcudbright (the 'Artists town' and key tourism asset). Consider undergrounding. 6. Removal of line from Tongland to Dumfries welcomed.	
	Zone 4, Glenlee to Kendoon, recommendations: 1. Area around Kendoon power station is a bottleneck and appears 'congested' with powerlines at present. High amenity area with important through route/tourist trail. Is there an opportunity to rationalize this area? Consider undergrounding. 2. Few options for this zone but Bennan Hill viewpoint and views up/down the valley, from Ken Bridge area, New Galloway and St John's Town of Dalry are highly important to tourism and visual amenity. This may be an area where undergrounding is appropriate.	Zone 4, Glenlee to Kendoon: 1. SPEN will consider the rationalisation of the existing 132kV network in this zone during the line routeing stage. 2. The council's highlighting of sensitive visual receptors is noted and these will be mapped and taken account of during the line routeing stage.

	Zone 5, Glenlee to Dumfries, recommendations: 1. Dalry – Black Craig – Loch Urr section will be sensitive; pressure from windfarm developments has highlighted the value of particular skylines as a backdrop to popular views and the 'unspoilt/naturalness' of specific areas. Options to locate within existing afforestation toward southern edge of the zone for screening are limited to a very narrow space (see below re alternative corridor). 2. Need to consider cumulative effects in association with lower voltage connectors eg. at Corriedoo. 3. Loch Urr – Moniaive/Dunscore area; Whilst Dalmaclellan forest might offer opportunities for screening part of the potential route, there is a significant risk that development could dominate the settled upper glen and valley. The glen/valley and part of the preferred corridor is also within the Thornhill Uplands RSA. 4. Crossing the Cairn Water Valley will need careful siting and design to avoid impacting on settled areas and on views up/down the valley. 5. Potential routeing between the Keir and Nith valleys could impact on views toward distinctive Keir hills; need to look for opportunities to use landform to help screen or as a backdrop.	The council is thanked for its comments relating to this zone, which have been considered and will be retained for future reference. However the KTR Project is not being carried out within Zone 5.

	6. Suggested alternative corridor; corridors G/D 1, 2, 3 and 4 all feed into the Moniaive/Dunscore valley as well as potentially impacting on the sensitive narrow upper glens. Suggest opportunities to run a line through the afforested upland area to the south are considered. A potential corridor following G/D 5 at first (south of Black Craig), then heading east past Garcrogo Hill and Green Top of Drumwhirn, then heading south past Auchenhay Hill before running parallel to the north of the A75 into the Nith Valley. This corridor would not be without issues but would appear to run through less settled and less sensitive landscape areas. 7. Nithsdale is settled and busy with specific receptors within the zone (Charles Jencks Garden (Portrack), Ellisland, transport routes; A76, railway); these should be recorded as specific sensitive receptors. 8. The preferred corridor includes non-inventory designed landscapes to the north of Dumfries at Carnsalloch and Duncow with Gribton and Dalawoodie in close proximity.	
	Zone 6a, Dumfries to Harker (Cumbria) Recommendations in the Nithsdale area: 1. The preferred corridor avoids Locharbriggs and Heathhall, following the Lochar Water to the east of Dumfries and includes non-inventory designed landscapes at Dunwoodie, Rockall, Mousewold Place and Brocklehirst (the latter being adjacent to the proposed substation search area). It also crosses the A75 trunk road which is an important tourism route across the region.	The council is thanked for its comments relating to this zone, which have been considered and will be retained for future reference. However the KTR Project is not being carried out within Zone 6a.

	2. Torthorwald ridge is an important backdrop to Nith Valley/Dumfries area and is part of an RSA. The preferred route crosses the 'toe' of the ridge in the area around Mousewold and Carrutherstown. Siting and design of line on lower slopes of this feature will be a challenge but could provide opportunities for backclothing; crossing the ridge will also require care to avoid skylining and detracting from this relatively small (vertical) scale landscape feature. 3. Potential issues with location of substation at D2; Lochar Moss peat reserves, overlooking from nearby higher ground and A75. 4. Potential cumulative issues associated with the existing overhead line could be an issue between Racks and Cummertrees. Recommendations in the Annandale area: 5. The preferred corridor heads north-east from the Kinmount House area then crosses Annandale and the M74 corridor between Kettleholm and Ecclefechan. It then heads East-South-East covering Middleby and Chapelknowe before crossing the border to the south into Cumbria. 6. A 400kv line already runs through the preferred corridor and there are likely to be cumulative issues where the two lines run parallel and/or in close proximity.	

	7. Corridors D/H 1, 2, 3 and 4 all pass through the Kirtle Water valley (LCT 4); this small scale, intimate landscape would be highly sensitive to development. Part of the unit is already influenced by the M74 and railway; however, this is not the case for the area within the preferred corridor to the east of Eaglesfield. 8. The preferred corridor passes through a farmed and settled landscape which includes non-inventory designed landscapes at Denby, Murraythwaite and Hoddom. Whilst local landform and planting offers opportunities for screening, these areas are potentially sensitive to development. 9. Burnswark is a prominent viewpoint and landmark feature overlooking the whole of Annandale, as well as an important historic site. It is a key orientation point within the broad open landscape and is visible over long distances. The preferred corridor passes within a few km of this between the hill and key viewpoints such as the M74, railway, Annandale Way, etc. Location of overhead lines within this section of corridor could have a significant impact on perceptions of this landscape feature.	

	Access Officer: 1. The region has numerous core paths, rights of way and the wider access network, the selection of the exact routes within the preferred corridors needs to consider the impact on the existing network and the impact on the regions tourism to mitigate the impact where possible and engage with the access team to identify suitable alternative options or measures. Whilst not at this stage now it is important that Access is considered at the strategic Group established to engage with SPEN through the process. 2. The Biosphere is a UNESCO designation and the first in Scotland, it covers an area some 5,200Sq kms in the south west of Scotland and has been established to support the sustainable development of the region's rural communities. The emerging preferences place the corridors in conflict with the Biosphere's core and buffer areas particularly focused on the section from Newton Stewart to Glenlee. The increase in the proposed height of the towers is likely to create a visual impact on the landscape and ultimately on the biosphere both from a habitat perspective and for the local communities and regions' tourism businesses. Consideration should be given to extra measures within this area to minimise the cumulative impact of this project, it is important that the Biosphere is considered and that SPEN engage with the Biosphere Partnership Board.	**Access Officer :** 1. Key tourist viewpoints and routes (including core paths and rights of way) will be mapped and taken account of during the line routeing stage. Consultation with the Council's access officer will be undertaken to inform the identification of 'key' routes at this stage. 2. We will continue to liaise with the Biosphere Partnership Board to inform the KTR Project. 3. We welcome the offer of provision of further information and consultation with Countryside Services in relation to the interaction of the KTR Project with the Galloway Glens HLF Project.

	3. Galloway Glens HLF project – a multi-million pound project is currently being developed focusing on the Ken/Dee catchment area which again is subject to the same impact as the Biosphere from SPEN's initial proposals, the impact and final route alignment need to take into consideration the impact on these project areas as part of the scoping and EIA phases and that further consultation should be undertaken with Countryside Services to review the range of projects and their locations within the catchment to look at impact and mitigation.	
	Biodiversity Officer: 1. Immediately to the north of Newton Stewart: This area has very high biodiversity value, including SAC, SSSI, Local Wildlife Site, RSPB Reserve, ancient woodland, veteran trees, a major watercourse, unimproved grassland and protected species. This, together with important archaeology, including Scheduled Monuments, A-listed buildings and scenic issues, will make finding an acceptable route for the power lines challenging. Local consultation will be critical, including (amongst others) SNH, RSPB, Forestry Commission, Galloway Fisheries Trust, Galloway Estates and D&G Biodiversity Officer. All of these organisations are already working together in projects in this area through the Cree Valley Community Woodlands Trust. It may therefore be the case that the CVCWT offers a suitable vehicle for at least part of this consultation.	**Biodiversity Officer:** 1. The biodiversity officer is thanked for these comments, which have been considered and will be retained for future reference. This area does is not included in the KTR Project. 2. The preferred corridor G/T 2 avoids crossing the Loch Ken and River Dee Marshes SPA. Flight data has been collated for the KTR project and has informed the identification and appraisal of corridors. Ongoing consultation with SNH/RSPB/WWT will inform the scope of the detailed ornithological surveys which will be undertaken to inform the EIA process commencing in 2016. 3. The biodiversity officer is thanked for these comments, which have been considered and will be retained for future reference. This area in not included in the KTR Project. .

	2. Loch Ken: The western route may bring the powerlines more into the flight path of the geese, for which the loch is designated as an SPA, and other important species. Recommend that detailed analysis of the flightpath of these species should be carried out through consultation the relevant organisations (potentially SNH/RSPB & WWT). If detailed flightpath information is not available, it would be appropriate to include surveys in the proposed fieldwork. 3. Lochar Moss: Potential substation siting areas D4 and D5 overlap with the Lochar Moss to the south east of Dumfries, which is an extensive area of deep peat that was afforested in the 1970s. These areas of the Moss are owned by Forestry Commission, which has made a long term commitment to restore the site to peatland for biodiversity and carbon sequestration reasons. It would therefore not be appropriate, and potentially practically difficult, to site a substation on the areas of peat.	
	Historic Environment: It is confirmed that there is potential for a proposal of this nature to have significant impact on cultural heritage assets and therefore potential effects, both direct and indirect, will need to be assessed. The preliminary consultation document recognises this, and that the historic environment is a key factor for appraisal, and this is welcomed. The consultation document gives a good analysis of the route options and their potential impacts, and a clear explanation as to the choice of a preferred route and its resulting implications.	**Historic Environment:** Non-Inventory Designed Landscapes will be mapped and avoided where possible during the line routeing stage. The HER sites noted as 'National Importance Non-Designated Sites' and 'Promoted Sites' will be mapped and taken account of during the line routeing and appraisal stage. The council's archaeologist provided a comprehensive list of archaeological sites/features by zone, which will be taken account of in the routeing and assessment stages. A number of these features comprise B/C Listed Buildings, HER sites, Promoted Sites or Non-Inventory Designed

	Whilst the regional designation of Archaeologically Sensitive Areas are included, in much the same was as Regional Scenic Areas are covered in designated landscapes, there is no reference to non-Inventory Designed Landscapes, which are regionally important. Designed gardens and landscapes should be assessed both for cultural heritage and for landscape and visual impact. The Council's Historic Environment Record (HER) also notes undesignated assets of national importance, being sites that are considered to meet the criteria for scheduling but which have not yet been assessed by the designating authority. In addition the archaeology service also notes a group of sites referred to as 'Promoted Sites'. The 'promoted sites' are ones which are promoted through a number of sources, such as government literature (HMSO), Historic Environment Scotland Properties in Care, Solway Heritage's Archaeosites project and leaflets, Council-led schemes and local community initiatives. In addition to archaeological or historic interest, many are also of importance in relation to community engagement with the past, tourism, a sense of place and other wider cultural issues It would be helpful if these groups of historic environment features were taken into consideration at an early stage in relation to route siting within the corridors, in addition to the statutory designated sites already addressed within the initial assessment. The council provided a comprehensive list of features for specific zones and preferred corridors which should be taken account of in addition to the already noted designated sites.	Landscapes which will be mapped and avoided where possible during the line routeing stage. The setting of a number of features was also highlighted and these will be taken account of during the line route and substation site appraisal. Direct effects: These comments are noted. The ongoing routeing and subsequent design of the KTR Project will seek to avoid direct effects on archaeological sites where possible. Indirect effects: These comments are noted. The setting of archaeological sites, in particular those of national importance, will continue to inform routeing and subsequent EIA and a ZTV will be produced to inform the assessment. The methodology for the assessment of effects will be agreed with Historic Environment Scotland and the Dumfries and Galloway Council archaeologists.

	Direct effects: National planning policy and guidance promotes the preservation of archaeological sites in situ where possible, and this should be the basis for more detailed design. Any potential direct impacts on scheduled monuments will require consent from Historic Environment Scotland. Indirect effects: Generally, impacts on the setting of significant historic environment assets, should be led by the Zone of Theoretical Visibility (ZTV), with the greatest effects likely to be experienced by sites of national, (note not all are designated, see above), or greater significance closest to the site. Historic Scotland's guidance note on setting should be used as the basis for assessment.	
Cumbria County Council	1. It will be particularly important that account should be taken of the cumulative effects of other related major investments that will take place in Cumbria, such as the NuGen Moorside nuclear power station, the National Grid North West Coastal Connections Project as well as the potential West Coast Tidal Lagoon. 2. A Construction Method Statement (CMS) will be required to support the Development Consent Order (DCO), and will need to be sufficiently precise and detailed to reassure CCC that the effects upon the local communities, especially in terms of the potential for highways disruption will be properly managed.	Cumbria County Council is thanked for its comments which have been considered and will be retained for future reference. However, no part of the KTR Project is being carried out in Cumbria.

	3. As the project progresses, CCC would welcome discussion about how local people and businesses could be used to support delivery of the project. It is recommended that at the next stages, SPEN should consider a programme of support for skills and training so that opportunities for local people could be maximised.	

	Landscape: 1. It is likely that the main physical land-use effects upon the local area will relate to landscape and visual impacts. In this regard, the proposed project affects a swathe of land in north Cumbria, from the Scottish Border to the north of Carlisle. This falls within Zone 6b, as set out in the preferred corridors and siting options for substations consultation. In summary CCC would wish to see the cumulative effects of existing lines be rationalised to avoid the proliferation of electricity lines in this area north of Carlisle. 2. Removal of an existing section of 132kv line, which runs to the north of Rockliffe, and along the Scottish side of the Solway estuary is welcomed. 3. The Council's Cumulative Impact of Vertical Infrastructure (CIVI) work indicates that the area currently experiences significant effects arising from vertical infrastructure. The built up area of Longtown, and the minor roads to the south are also highlighted as experiencing significant effects. In light of these assessments within the CIVI, it is considered that if it is not possible to rationalise the existing 132kv line highlighted above, it is suggested that care should be taken to site the proposed high voltage line a sufficient distance away, so as to minimise potential cumulative impacts.	Cumbria County Council is thanked for its comments which have been considered and will be retained for future reference. However, no part of the KTR Project is being carried out in Cumbria.

	4. The main visual receptor in the area is the settlement of Longtown. Care should be taken to avoid intensifying the visual effects arising from the existing 132kv line, which runs in close proximity to the town to the south. 5. Whilst the trees may serve to screen potential views of towers to an extent if sited appropriately, this area should be regarded as a pinch point in landscape and visual terms. 6. The approach to routeing, and the technology used, should seek to mitigate potential effects upon this area as a priority. 7. It is noted that the proposed upgrade seeks to link into the proposed substation at Harker. The proposed National Grid North West Coastal Connections project (NWCC) also seeks to link into this substation. CCC highlights the need to reduce the existing 'wirescape' on the outskirts of Carlisle in responding to the NWCC consultation. Opportunities should be taken by SPEN to work with the National Grid in seeking to address this through line rationalisation.	

	Archaeology: At this stage, CCC would advise that there do not appear to be any archaeological issues that would prevent the preferred route & substation in Carlisle District from progressing. It is noted and welcomed that SPEN intend to undertake an EIA and that all the appropriate designated heritage assets of archaeological interest within the corridor are listed in the *Routeing and Consultation Document*. CCC welcomes that fact that the preferred routeing option would avoid the Hadrian's Wall World Heritage Site Buffer Zone. It is also noted that the consultation includes a positive cultural heritage impact, which involves the decommissioning of the existing line crossing the Registered Battlefield of Solway Moss. This proposal is to be supported as an improvement to the visual amenity of the designated Battlefield and offers opportunity for improved interpretation at this historic site.	Cumbria County Council is thanked for its comments which have been considered and will be retained for future reference. However, no part of the KTR Project is being carried out in Cumbria.
	Highways and Transport: 1. Zone 6b: At this stage, CCC is of the opinion that there do not appear to be any significant adverse transport-related issues that would give rise to concern about the suitability of SPEN's preferred corridor D/H 1 within Cumbria and the area H1 just to the north of Carlisle. However, as the project progresses, CCC would wish to work with SPEN to consider specific detailed highways related issues, once more detail of the project is available for comment.	Cumbria County Council is thanked for its comments which have been considered and will be retained for future reference. However, no part of the KTR Project is being carried out in Cumbria.

	2. It is expected that the following information should also be provided at that stage: • A construction management plan / traffic management plan (TMP). • Early conversation with the Local Highways Authority about an appropriate license for any works within the highway.	
	Flooding and drainage: It is recommended that SPEN consider the potential flood risk within the substation Siting Area H1 to the north of Carlisle, and it is recommended that by working with CCC, SPEN will need to consider the likelihood of a 1:100 surface water flooding event in this location, and not just for Zones 1 to 3 under the Environmental Assessment. CCC would point out that Harker is an area at risk of flooding, especially in the Rockcliffe Area. The CCC's Lead Local Flood Authority Team would wish to work with SPEN to discuss in detail the siting of Area H1 to avoid adverse culverting or diversion of existing watercourses.	Cumbria County Council is thanked for its comments which have been considered and will be retained for future reference. However, no part of the KTR Project is being carried out in Cumbria.
	Public Rights of Way: The potential corridor identified for the overhead power lines contains a number of public rights of way (PRoWs). There are approximately five depending on the route taken within the Cumbrian section. CCC is under a duty to assert and protect the rights of the public to the use and enjoyment of, and to prevent so far as possible the stopping up or obstruction of, all their highways. Where the routeing of the power line, sub stations or its access routes would directly affect the safe use of any of any public right of way, it may be necessary to apply for a temporary closure for the duration of the works in the interests of public and site safety.	Cumbria County Council is thanked for its comments which have been considered and will be retained for future reference. However, no part of the KTR Project is being carried out in Cumbria.

	Property: The only site that is owned by CCC within the "range" of the project is the Hespin Wood Waste Disposal Site. The preferred route of the re-electrification works takes the proposed power lines out of the Harker sub-station and across the M6, thereby avoiding Hespin Wood. However, due to the size of the Hespin Wood Waste Disposal Site, it is considered that if the route were to be diverted out of the Harker sub-station in a north-westerly direction, SPEN will need to take account of the fact the new electricity line may cross a significant fully operational waste management site.	Cumbria County Council is thanked for its comments which have been considered and will be retained for future reference. However, no part of the KTR Project is being carried out in Cumbria.
	Minerals and Waste: It is not clear whether ballast material would be required to support the individual tower construction, and at this stage there are no details as to where such material would be sourced. In the interests of sustainability, it is recommended that any material required for construction should be sourced locally to offset transporting material over long distances, and this approach would help support of the local economy. Consideration should also be given as to how material can be brought to site either by road or rail. SPEN will need to have regard to a number of specific minerals and waste sites/planning permissions within the Zone 6b area (English Border to Harker) in Phase 2 in considering the proposed route of the new electricity line.	Cumbria County Council is thanked for its comments which have been considered and will be retained for future reference. However, no part of the KTR Project is being carried out in Cumbria.
Natural England	Based on work to date Natural England welcome the consideration to landscape character, visual amenity and ecological impacts. As the project progresses NE will focus on the section of overhead line from the Scottish Border to Harker. NE would like to be kept updated as the project progresses.	Natural England is thanked for its comments which have been considered and will be retained for future reference. However, no part of the KTR Project is being carried out in England.

Appendix B: Summary of responses from non-statutory consultees

APPENDIX B: Summary of responses from non-statutory consultees

Consultee	Issues Raised	SPEN Response
RSPB (Scotland)	Comments about zones: Zone 1, Auchencrosh to Newton Stewart: • Concerns over impact on RSPB Nature reserve at Wood of Cree • Potential for waterfowl species impacts on Maberry, Dornal and Ochiltree lochs. • Avoidance of Bladnoch SAC should be prioritised through routeing. • Support objective to avoid ancient woodland through routeing. Zone 2, Newton Stewart to Glenlee: • Strongly support the avoidance of Loch Ken and River Dee SPA. • Potential impact on some of the 154ha of Ancient Woodland a concern. Zone 3, Glenlee to Tongland: • Note circa 50ha of potential foraging habitat for SPA designated geese species could be avoided and advise this is achieved through consultation with WWT/RSPB. • Avoids direct impact on Airie Hills SSSI – upland bird Annex 1 species and habitats. • Site sensitivities for Annex 1 raptor species (red kite, osprey, and nightjar) need to be considered. • Support objectives to avoid ancient woodland.	**Comments about zones:** RSPB (Scotland) is thanked for its comments regarding Zones 1, 2, 5, 6a, 6b and substation siting areas, which have been considered and will be retained for future reference. However, no part of the KTR Project is being carried out within these zones. We note that the RSPB acknowledge the objectives which we have applied in routeing in relation to the avoidance of designated sites, ancient woodland and limiting potential collision risk of SPA designated wildfowl species. These objectives will continue to be applied during the line routeing and appraisal stage and subsequent EIA. In addition, at the line route identification and appraisal stage, habitual concentrations of red kite, and potentially hen harrier, communal winter roosts will be mapped on the basis that these species are known to use traditional roost sites in concentrated numbers from year to year. Other species of high/moderate conservation concern e.g. osprey, red kite, nightjar, will be considered during the alignment/EIA stage in relation to i) collision risk and ii) disturbance during construction and operation. With regard to proposed substation locations, for the KTR Project SPEN intends, to extend the existing 132kV Glenlee substation. General comments: Comments on corridors are noted as above.

	Zone 4, Glenlee to Kendoon: • Site sensitivities for Annex 1 raptor species (red kite, peregrine) need to be considered. Zone 5, Glenlee to Dumfries: • Impact to Loch Ken and River Dee SPA should be avoided through routeing options. • SPA designated wildfowl species (whooper swans, greylag geese) pass through this corridor north of Dumfries. • 243ha of Ancient woodland is located within this corridor. Avoid impacting through routeing options. Zone 6a, Dumfries to English Border: • This corridor will fall within the flight paths of designated SPA species (Pink-footed geese and whooper swans). Appropriate mitigation measures such as line marking will need to be put in place to reduce the potential for collision risk. Substation siting: • It is strongly advised substations are not located within area of flood risk. • Lochar Moss is a peatland which has under-gone restoration management and is associated with the adjacent Solway North Moss SAC complex and Longbridgemuir SSSI. It has been identified as having one of the highest levels of carbon store in southern Scotland. It is strongly advised that location options should ensure no impact to this habitat.	

	• Regarding ALL proposed new substation locations it is advised that the potential of existing substations should be utilised in preference to construction of new substations through up-grading/extensions to minimise the impact of new development (where other constraints allow). General comments: • Corridors G/T 1, 2, 3, 4 have the potential to impact on significant existing biodiversity sensitivities (Loch Ken and River Dee Marshes SPA and designated features). As advised above the current preferred corridor (G/T 2) needs to ensure no impact on this site or related features. • Corridors G/D 3, 4, 5, 6 have potential to impact on significant existing biodiversity sensitivities (Loch Ken and River Dee Marshes SPA and designated features). As advised above the current preferred corridor (G/D 3) needs to ensure no impact on this site or related features. • Corridors D/H 2, 3, 4 have potential to impact on significant existing biodiversity sensitivities (Upper Solway Flats and Marshes SPA and designated features).	
The Coal Authority	No comments or observations to make on this proposal.	The comments of the Coal Authority are noted.
Scottish Wildlife Trust	Knowetop Lochs is located within the Zone 5 preferred corridor. Species potentially impacted by new overhead lines are likely to include wildfowl, notably greylag geese.	The Scottish Wildlife Trust is thanked for its comments which have been considered and will be retained for future reference. However, Zone 5 is not part of the KTR Project.
ScotWays	ScotWays are keen to provide input however ask to discuss the information required in order to tailor response to requirements.	Access and rights of way at a national and regional level have been mapped (e.g. Southern Upland Way and Solway Heritage Trail) to inform the appraisal of corridor options and substation siting areas. Rights of way will also be considered at the line routeing appraisal stage.

Transport Scotland	Available information is not sufficient to allow Transport Scotland to make detailed comments on the preferred corridors. Note that preferred route involves crossing several trunk roads (Zone 3 – A75, Zone 5 – A75, A76, A701, Zone 6a – A75, A74) With respect to Zone 6a, it is noted that the corridor runs parallel to the A75 with potentially two crossing points. Transport Scotland would advocate the minimisation of crossing points of the trunk road. Would welcome further consultation when greater detail is available.	The comments of Transport Scotland are noted. The KTR Project no longer affects Zones 5 and 6a. However we will continue to liaise with Transport Scotland as the KTR Project progresses.
National Trust Scotland	The proposed route will take in countryside to the immediate north of Ecclefechan, and Thomas Carlyle's birthplace, and will therefore be directly visible from the property. Concern that the wider landscape will be traversed by towers, including the area around Craigenputtock (especially Craigenputtock House) and Scotsbrigg. Concern over the area around Craigenputtock and Scotsbrigg which also have a close connection to Carlyle. Underground or subsea cabling would be most appropriate. Benefit for local communities would be minimal. Would impose constraints on local businesses that rely on tourism and natural heritage.	The National Trust Scotland is thanked for its area based comments which have been considered and will be retained for future reference. The areas mentioned are no longer affected by the KTR Project. Subsea With regards to subsea cabling, this is no longer relevant to the KTR Project which has a reduced scope to modernise the existing transmission network and connect new generation. Undergrounding High voltage, high capacity overhead lines are the economic and reliable choice for the bulk transmission of electricity throughout the world. It is therefore our view that wherever practical, an overhead line approach is taken when planning and designing major electrical infrastructure projects such as this. However, we appreciate that there are specific circumstances in which an underground approach should be considered. If, through the routeing process, it is determined that an underground cable section is required then the approach is to minimise the length of underground cable necessary

		to overcome the constraint to routeing. This must be consistent with a balance between technical and economic viability, deliverability and environmental considerations. Benefits for local communities The principal benefit for local people will be the increased reliability of a network which, at up to 80 years old, is nearing the end of its operational life and needs to be replaced. Effects on businesses and tourism We appointed a consultant to help us appraise, at a high level, some of the wider socio-economic effects associated with the options which have been taken into detailed cost-benefit analysis. The key socio-economic indicators assessed include employment, expenditure, amenity and carbon. The outputs of the socio-economic appraisal have been applied in a sensitivity testing exercise to highlight the wider socio-economic considerations for each reinforcement option considered. This has included consideration of the potential socio-economic effects of the project across a range of areas that may arise during both the construction and long term phases, and assessing any impact on tourism and recreation, while considering local amenity issues. Further to this, once the project progresses and further details are available, a full socio-economic impact study will be carried out as part of the project Environmental Impact Assessment (EIA) and detailed in the resulting Environmental Statement.

Scottish Water	Zone 3, Glenlee to Tongland: Ringford Boreholes lie within this Consultation Zone. The Ringford borehole well field abstracts groundwater from a shallow alluvial, superficial gravel aquifer on the flood plain of the Tarff Water. It is thought that at least 25% of the abstracted water comprises induced flow from the river and so any polluting material from the tower construction in close proximity to the well field may affect water quality. (A map is included which shows (i) that portion of the Tarff Water catchment that is included within Consultation Zone 3 and (ii) an approximate area where it is thought that any polluting incidents may have a much higher risk of affecting water quality at the well field. Scottish Water would prefer that the tower route avoids the higher risk zone where possible and request consultation on mitigation requirements if the route is to go through either of the mapped areas shown. Zone 4, Glenlee to Kendoon: Carsfad Loch (an emergency source) and its catchment overlaps with this zone. In addition, to catchment protection, main roads are aligned either side of the impounding reservoir, and if these were to be used as access routes for heavy loads, then SW Reservoir Team should be consulted. (Map included) Zone 5, Glenlee to Dumfries: Overlaps on the Dumfries abstraction boreholes' combined catchment only in the far north of the aquifer. In view of the confined nature of the aquifer the risk of any impact on it from work on the HT network is considered negligible. However, as a precaution, if the route is selected through this zone, SW would request notification of any pollution incidents affecting the Cairn Water and River Nith.	Zone 3, Glenlee to Tongland: During the line routeing stage we will take into account the location of the Ringford borehole well field and the Tarff Water catchment and where possible line route options will be identified which avoid the 'higher risk' area. If avoidance is not possible, we will consult with Scottish Water during the routeing process regarding the route and appropriate mitigation. Zone 4, Glenlee to Kendoon: We are aware that the route may pass through the Carsfad Loch catchment and mitigation measures will be required to ensure catchment protection. We will consult with Scottish Water during the routeing process regarding the route and appropriate mitigation, if necessary. If the roads adjacent to the loch are to be used for access routes during construction, we will consult with SW reservoir team and mitigation/emergency procedures will be developed, as appropriate. Zone 5 - Scottish Water is thanked for its comments regarding Zone 5, which have been considered and will be retained for future reference. However, no part of the KTR Project falls within Zone 5. Precautions: The list of precautions to be taken when working in the vicinity of SW assets (provided in Annex 1 of the SW response) will be taken into account during detailed design and EIA phase. Relevant plans (e.g. method statement, pollution prevention plan, risk assessment, contingency plan and environmental management plans) will be prepared and submitted prior to construction.

	Precautions: SW also provided a list of precautions to be taken when working in the vicinity of SW assets.	
Ministry of Defence	The majority of the preferred corridors identified passes through a part of the UK Military Low Flying System containing a Tactical Training Area (20 T) within which operational low flying training is carried out. In principle, the MOD does not object to the strategic reinforcement project as proposed. Taking into account the presence of existing overhead power lines and wind farms in the area, it is not anticipated that this scheme will have a significant impact upon the ongoing use of the Tactical Training Area for operational low flying training. However, the MoD request that they are consulted again on this proposal once more detailed information concerning the route and location and heights of any new lattice towers and overhead cables becomes available. Due to the corridors' position within a low flying tactical training area it will be necessary for the finalised route and location of the lattice towers and overhead cables to be charted on aeronautical charts and mapping records. MoD request at the planning stage that a condition be included in any planning permission granted stipulating that details of the scheme are sent to the Defence Geographic Centre for charting.	The MoD's comments are noted. We will continue to consult the MoD as the KTR Project progresses.

Woodland Trust Scotland	1. At present the Woodland Trust objects to the project on the basis of potential for direct loss, damage and fragmentation of large areas of ancient woodland. 2. The Trust would like to see SPEN ensure that any areas of ancient woodland are kept outside of corridors in future routeing proposals and consultation. To leave ancient woodland within or adjacent to proposed routes leaves the woodland open to future damage and/or loss. 3. Development as part of electricity transmission projects may impact on ancient woodland in a number of ways: • Direct destruction of ancient woodland habitat; • Fragmentation as a result of the destruction of adjacent semi-natural habitats; • Where the wood edge overhangs the route of the power lines and towers, branches and even whole trees can be indiscriminately lopped/felled, causing reduction of the woodland canopy; • Underground cabling could lead to ancient woodland and its characteristic soils being affected; • Disturbance by noise, light, trampling, and other human activity; • Chemically through acidification, eutrophication and pollution from machinery involved in construction processes;	1. The comments of the Woodland Trust are noted. 2. Ancient Woodland was mapped and formed a criterion in the appraisal of corridor and substation siting area options with the objective being to avoid/limit the potential for felling of ancient woodland. This objective will continue to be applied during the line route identification and appraisal stage and subsequent alignment (towers and temporary tracks etc) and EIA stage. 3. As above. 4. Potential cumulative effects on ancient woodland will be taken account of during the EIA stage. Cumulative landscape and visual effects will be considered during the line routeing phase of the project, and line routes will be identified in order to avoid or minimise potential cumulative effects, in accordance with Rule 10 of the Horlock Rules. 5. During the next stage of routeing, the process will continue to take account of environmental characteristics and will shape the final design of the project as part of an EIA. The assessments to be undertaken as part of the EIA will be decided as part of a scoping exercise with statutory consultees.

	• Changes to hydrology via installation of new hard-standing structures. This may lead to the alteration of groundwater and surface water quantities affecting the woodland's characteristics. 4. The cumulative effect of development is more damaging to ancient woodland than individual effects, which should not be considered in isolation. **5.** We also recommend that, if not already considered, an Environmental Impact Assessment (EIA) with suitable survey work is carried out to ensure that any potential species, both fauna and flora, and their populations present within the corridors are not affected by the development.	
John Muir Trust	1. Any potential impact of the Project on nationally designated landscape e.g. the Nith Estuary National Scenic Area, the Southern Upland Way, the Wild Land Area at the Merrick, or other natural heritage designated sites needs to be carefully assessed and due regard given. 2. The cumulative impact of this project with other infrastructure on the visual and landscape resource of Dumfries and Galloway must be considered. 3. SP must demonstrate that alternatives have been adequately assessed as part of a Strategic Environmental Assessment (SEA) process. 4. The lack of a clear case for the Project in principle and uncertain cost estimates could both lead to unnecessary added costs to electricity consumer bills, which is not in the public interest.	1. Designated sites will continue to be mapped and avoided where possible during the line routeing and substation siting and appraisal stage and included within the assessment as part of the EIA. 2. Cumulative effects will be taken account of during the line route appraisal and subsequent EIA stages. 3. to 6: As part of our assessment of strategic options, we considered a range of factors when comparing a large number of reinforcement options. These factors included areas of highest environmental impact, visual amenity, environmental impact, capital cost, technology risk, planning and consenting risk and technical benefits. This analysis resulted in a number of options being discounted at the strategic stage. SPEN and National Grid, in its role as GB Transmission System Operator have undertaken a

	5. It will not be acceptable for public money to be allocated to an environmentally damaging project without all the true costs and benefits of alternatives being considered and available to the public. There are legal duties to consult the public, including undertaking an SEA of the over-arching strategic transmission plan or programme. 6. Both SP and Ofgem have legal duties to ensure that the environment is correctly protected. This duty allows Scottish Power to propose, and Ofgem to accept, a more expensive option if it is environmentally required. 7. Lessons must be learned from other projects within the UK and under Ofgem's remit – specifically the Beauly Denny transmission project. This applies to all of the following: a. the technical assessment of the need for the project b. the cost benefit analysis c. environmental impacts 8. Welcomed consultation at an early stage and urged feedback to be fully considered.	thorough cost-benefit analysis (CBA) of the original strategic options to determine the extent of reinforcements required to facilitate an economic and efficient transmission system. The CBA analysis entailed the assessment of incremental reinforcements to the transmission system against various generation scenarios and determining the most efficient and economic system that will provide the best value for money for the GB consumers.The main conclusion of the CBA was that the DGSR Project, i.e. the full 400kV Auchencrosh to Harker proposal, did not deliver enough benefit for GB consumers relative to the cost of the investment. As a result, SPEN only proposes to take forward the reinforcement and modernisation of the 132kV network between Polquhanity, Kendoon, Glenlee and Tongland at the present time, known as the KTR Project. Environmental impact is a key consideration in the proposals that are being taken forward. Our document *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment* explains the process we go through to identify and appraise potential areas for overhead lines and the stage at which we might consider alternative options such as undergrounding. In addition, SPT Transmission plc, which is a wholly owned subsidiary of SPEN and as the holder of a transmission licence, has a duty under Schedule 9 of the Electricity Act 1989, when putting forward proposals for new electric lines and other transmission development, to have regard to the desirability of the preservation of amenity, the natural environment, cultural heritage, landscape and visual quality, as well as the effect of works on communities.

		4. to 8: The comments of the John Muir Trust have been noted.
Mountaineering Council of Scotland	Zone 2, Newton Stewart to Glenlee: 1. From the options presented for Zone 2, NS/G 2 is preferred. This would move the proposed overhead line further from Wild Land and areas of mountaineering interest. However, neither NS/G 1 nor NS/G 2 appears wholly satisfactory. 2. Why was a route following G1 in the west and G2 in the east, linked by a section passing south of Craignell / north of Brockloch Hill, not an option? This would also achieve the MCofS's aim of distancing industrial development from areas of mountaineering interest and may have less impact upon other interests than following route G2 in its entirety. 3. Do not agree with the statement made in the *Routeing and Consultation Document* (Appendix 4, p8) regarding NS/G 1. Whilst it is acknowledged that this corridor is in closest proximity to the Wild Land and crosses the Southern Upland Way the existing 132kV overhead line has altered the character of the landscape in this corridor which has assimilated to the presence of an overhead line. Zone 5, Glenlee to Dumfries: 4. The MCofS believes that line G/D 5 is preferable to the preferred option. This takes the overhead line near to existing main transport routes (A712, A75) rather than through the more scenic area around Loch Urr. 5. It is noted that Figure 7.6c omits the Loch Urr Wind Farm application site.	The Mountaineering Council of Scotland is thanked for its comments which have been considered and will be retained for future reference. However, no part of the KTR Project is being carried out in Zones 2 and 5.

Galloway and Southern Ayrshire Biosphere Partnership	Upgrade of the existing transmission network appears to be based predominantly on the wider national network requirements. The emerging corridor options provided show little regard for the region apart from its utilisation as a conduit of least resistance across a sparsely populated region to provide a connection to the national grid at Harker. Whilst the local network is running at capacity, the predominance of developments in the northern periphery of the region do not merit the corridors selected. The proposals bring no real economic benefits to the region through the development and installation of the network. The creation and upgrading of the network will have a negative impact on the regions fragile tourism sector which is already under considerable pressure. Corridors need to take into consideration other alternative routes that reflect the areas of renewable generation and the interconnector requirements and would ask that further work is undertaken to look at a northerly route option away from the core and buffer zones. The Southern Uplands are home to a wide and diverse abundance of key habitats, species and designations including the only two areas of designated wild land south of the central belt. Biosphere highlight that any future development work would require significant mitigation works to offset the disturbance and damage caused in establishing the network. Whilst the corridors at this stage do not provide the detailed route alignment the Biosphere would reiterate the need to be part of the formal engagement and consultation process as the project develops and would seek to have further engagement with SP Energy Networks in the future. Need to ensure that the impacts locally are outweighed by the benefits the region receives.	The comments of the Biosphere Partnership have been noted. One of the key drivers for the project is to replace ageing infrastructure which is approaching the end of its life and improve security of supply to the people in the area. The electrical transmission network by its nature, delivers benefits to a wide area, by providing secure electricity supplies to homes and businesses. The network facilitates the transfer of energy from multiple generation sources and across multiple routes. Our role is to maintain, operate and invest in that network to secure a safe, reliable, and economic service for current and future consumers. As part of our licence obligations, we have an obligation to connect new electricity generation to the network wherever it is contracted and we cannot dictate where new generation is built. When developing the project we considered the location of existing infrastructure, the contracted generation portfolio as a whole and the future needs of the transmission network. We have considered a range of strategic options which have been filtered balancing environmental, technical and economic criteria. We have appointed a consultant to help us appraise, at a high level, some of the wider socio-economic effects associated with the options which have been taken into detailed cost-benefit analysis. The key socio-economic indicators being assessed include employment, expenditure, amenity and carbon. The outputs of the socio-economic appraisal will have been applied in a sensitivity testing exercise to highlight the wider socio-economic considerations for each reinforcement option considered. This will has included considering consideration of the potential socio-economic effects of the project across a range of areas that may arise during

		both the construction and long term phases, and assessing any impact on tourism and recreation, while considering local amenity issues. Further to this, once the project progresses and further details are available, a full socio-economic impact study will be carried out as part of the project Environmental Impact Assessment (EIA) and detailed in the resulting Environmental Statement. We are committed to fully engaging with the council in this area as the project progresses. Internationally, nationally and regionally/locally designated sites will be mapped and avoided where possible during the line routeing stage. We will continue to consult with the Biosphere as the KTR Project progresses.
Caerlaverock WWT	We are glad that the towers close to the Solway are being removed as this area, between the Nith estuary and Carlisle, has a high incidence of bird strikes by migratory Whooper swans, typically resulting in death or fatal injuries. Implications for wildlife: Vantage Point surveys are likely to underestimate the importance of the valley to migrating wildfowl. VPs are designed to give a snap shot of what is using a site, which works well for resident species – with a high likelihood of encountering these species, but less well for species passing through the area. Of particular concern are the thousands of wildfowl that migrate along the north-south valleys (for example, the Nith and Cairn valleys). Whooper swans, barnacle and Pink-footed geese often migrate in hours of darkness. The greatest threat is in poor weather or at night - hence our concern for these migratory routes. It should also be noted that in poor visibility when collisions are likely bird	Caerlaverock WWT is thanked for its comments which have been considered and will be retained for future reference. However, no part of the KTR Project is being carried out in Zones 5, 6a and 6b. Implications for wildlife: Flight activity data has been obtained from WWT which will be supplemented by flight activity surveys (VP watches), designed to allow the calculation of flight activity rates that cover all periods. For example, during the migration seasons, extra VP watch effort is undertaken during this relatively short window. In addition, survey design attempts to include periods of low cloud or reduced visibility when auditory records are included. Also, an attempt is made to calculate night-time flight activity rates and incorporate these into any assessment of effects. The scope of flight activity surveys will be agreed with SNHand RSPB in consultation with WWT as necessary. The routeing methodology for the KTR Project aimed to

	'deflectors' are not effective. Questioned why the main criterion was avoiding hilltops in deciding the route. Concern about size of the proposed pylons. Positive alternatives: A line under the sea in the Solway Estuary would offer a secondary benefit by providing a protected area that could not be fished and as a result act as a source for shellfisheries within the firth. Our preferred option would be an underground route between towns and outlying villages, with the service roads doubling as cycle tracks that offer safe alternatives to car travel within the region and a tourist attraction in a long-distance cycle route. The reasons put forward against this are: • Overheating: The WWT felt overheating could be overcome with heat exchange and used positively for local community buildings and amenities e.g. heating swimming pools. • 'It is cheaper to check for faults flying along the towers in a helicopter': The WWT felt that remote methods e.g. drones must be possible and would be cheaper than fuelling a helicopter. Other comments: 1. Concern that the consultation merely a formality and that the project would not benefit local people. 2. Concern about the visual impact on a landscape enjoyed by visitors to the region.	limit widespread visibility of the lattice steel towers and overhead line by avoiding the highest ground whilst also avoiding areas of highest environmental value (i.e. designated sites, including SPAs designated for wildfowl). Positive alternatives: Various subsea options were considered in our assessment of strategic options, but these have high capital costs and have therefore been discounted on economic grounds. It should also be noted that a subsea option would not negate the need for upgrading the onshore network and providing capacity for new onshore generation. In relation to undergrounding, should the iterative routeing process not identify a suitable continuous overhead line or substation that meets the KTR Project objective, in accordance with our approach to routeing, we will make a clear and transparent decision on the next step. One of the key drivers for the project is to maintain security of supply to existing customers in the region. Heat exchange through water pipes laid alongside high voltage transmission cables has been used to improve electrical ratings in certain circumstances, but examples are not common. Although technically feasible, using this heat exchange technology for the benefit of the local community would require water pipes in the cable trench and additional heat exchange plant above ground. Consideration would also have to be given to the location of this technology and practical applications for use in an urban or rural context.

	3. Queried that the predicted power needs did not seem to fit the government's proposals for renewables in Dumfries and Galloway. 4. Asked whether Scottish Power could subsidise the cost of mitigation such as subsea or underground options.	Other comments: 1. The principal benefit for local people will be the increased reliability of a network which, at up to 80 years old, is nearing the end of its operational life and needs to be replaced. 2. A development of the size and geographical scale of the KTR Project will inevitably result in effects on the environment. However, we are committed to preserving the environment and mitigating any environmental effects. Therefore, consideration of potential effects on the environment will inform all stages of the project, to minimise any adverse effects on the environment, landscape and scenic qualities of all areas, including those valued for tourism and residential amenity. 3. We have consulted directly with all our contracted customers since the policy announcements and continue to engage with them on regular basis. As yet we have not seen a significant change in our contracted position in response to the announcements. Energy policy and its changing nature is a key driver being considered in the scenarios against which we are modelling our cost-benefit analysis to determine the appropriate capacity to meet the future generation position. 4. We have a statutory duty to develop and maintain an efficient, coordinated and economical system of electricity transmission because a proportion of everyone's electricity bill funds transmission infrastructure projects like this. But we also have a statutory duties which include having "*regard to the desirability of preserving natural beauty*" when planning any new electricity lines or other transmission work. The duties, which are set out in Schedule 9 to the Electricity Act 1989, mean we

		need to consider the impact our work might have on visual amenity, cultural heritage, ecology, landscape and the local communities in that area. The amount we spend on infrastructure is regulated by Ofgem.

Appendix C: Summary of responses from community and parish councils

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Section	Issues & Questions Raised	Reference to relevant sections in main report
NEED CASE & STRATEGIC OPTIONS		
National & Local Policy	Acknowledgement that the project in some form was necessary. Comments that the need and scope should be reviewed following the Government's decision to end subsidies for onshore wind farms. Request for a moratorium on the project due to these changes.	See the response within section 6.2 on ***DECC's announcement on subsidies***.
	Reference to the numbers of applications for wind farms being refused planning permission and a feeling this would affect the long term requirement for the project. Belief that there was a diminishing number of suitable development sites for wind farms.	See the response within section 6.2 on ***Changes in local planning determinations for wind farms***.
The case for replacing ageing infrastructure	Belief majority of Dumfries and Galloway's existing line is in good repair and could continue to serve local need. Reference to statements by National Grid that communities could be serviced by present structures for several years.	See the response within section 6.3 on ***The case for replacing ageing infrastructure***
The case for increasing transmission capacity	Comments that more justification needed for extra capacity to accommodate extra renewable energy generation.	See the response within section 6.4 ***The case for increasing transmission capacity***.
	Queries over whether the project took account of the lifespan of the line, changes in energy generation such as tidal barrages, the amount of electricity generated in windless cold days.	See Chapter 6, with particular reference to 6.2 T***he project in principle and Government policy***, 6.4 ***Wind turbine efficiency*** and 6.9 ***Cost***.

	Concern that increased capacity could attract more applications for wind farms in the area.	See paragraphs 6.4.4 to 6.4.9 under section ***The case for increasing transmission capacity***
	Concern the closure of Longannet Power Station, and other power stations could affect the need for the project.	See paragraph 6.4.12 to 6.4.14 under ***Changes to energy policy and power station provision***
	A belief that new renewable generation is largely in the west of the region and that needs in the east of the region could be transmitted by the existing connections to high voltage lines.	See paragraph 6.4.21 under ***Pattern of renewable development***
	Comments that SPEN should take account of technologies such as the storage of energy close to the consumer.	See paragraphs 7.7.5 to 7.7.8 under ***Tower design and technology***
The Moyle interconnector	Belief that Moyle interconnector is almost always used to export electricity to Northern Ireland.	See paragraphs 6.4.25 to 6.4.27 under ***The case for improved connectivity for the Moyle interconnector***
	Belief that subsea cable should be used to meet wish for Moyle interconnector to operate at maximum technical capacity.	See paragraphs 6.4.25 to 6.4.27 under ***The case for improved connectivity for the Moyle interconnector***
Strategic options	Comments that SPEN should fully explore alternative options, such as a subsea cable, or should have presented alternatives and justified its choice of option. A feeling that steel towers must only be erected if there is no alternative.	See the responses within section 6.5 ***Strategic options***

Subsea	Support for using a subsea cable to transmit the required electricity to England, on the grounds of visual amenity. Belief this could remove the need for any additional towers in Dumfries and Galloway at all.	See the responses within section 6.5 ***Strategic options***
	Reference to technology being used successfully in other parts of the country ref: Western Link.	As above
	Belief that an "overwhelming" number of residents preferred a subsea connection linking Auchencrosh to England, with replacement onshore infrastructure being put underground. Support for a subsea cable from Auchencrosh to an appropriate site in north west England or Wales.	As above
	Comments that technology exists to be able to export power along the existing line from Glenlee to Tongland, and then undersea to England.	As above
	Suggestion that SPEN could build its project in zones 1, 2, and 4 (underground where possible) and feed surplus power underground from the new sub-station at Newton Stewart to Cree Estuary/Wigtown Bay then under sea to England. A belief this would mean that nothing needs to be done in Zones 3, 5, 6a, and 6b, other than normal maintenance or refurbishment of the existing infrastructure.	As above

	Belief that a number of local planning policies would be contravened by an overhead line in several of the corridors.	See paragraphs 6.7.22 to 6.7.23 under section ***Planning considerations***
Undergrounding	Preference for electricity cables to be placed underground rather than the use of overhead lines supported by towers on the grounds of reducing the visual impact. Suggestion to bury the entire route, or large sections, or wherever possible, should be placed underground.	See the responses within section 6.7 ***Undergrounding***
	Acknowledgment that the option would be more costly but belief that it would cause least disturbance to the natural and built environment as well as to the people who live, work and use it for recreation.	See the responses within section 6.9 ***Cost***
	Suggestion that a subsea cable should take power from Auchencrosh to England, that any new infrastructure linking sources of generation in the west of the region could be reduced to 275kV, and buried where necessary. Belief that would mean that new lines in the east of the region could also be reduced in capacity to 132 kV, or the existing line could be refurbished. Comments that smaller voltage cables are less expensive to put underground.	See the responses within section 6.7 ***Undergrounding***
	Suggestion that the new transmission lines could be laid under an improved A 75.	See paragraph 6.7.30 under ***Suggested routes for underground cables***

Refurbishing or upgrading the existing line	Preference for refurbishing or upgrading the existing line to serve the local community, or for building a like-for-like replacement.	See the responses within section 6.8 ***Refurbishing or upgrading existing infrastructure***
	Belief that communities and the landscape were already habituated to existing lines and that new infrastructure should be built as closely as to them as possible to minimise adverse impacts in other areas.	See paragraphs 7.2.45 to 7.2.49 under section ***Consideration of corridors containing existing lines***
	Comments that the existing line between Tongland and Dumfries already roughly followed the industrial corridor of the A75 and appeared to follow the general principles of the Holford Rules.	As above
	Opinion that the adjacent NSA and RSA had been designated as such despite the presence of the existing line and new taller towers sited here would have a more limited impact on the environment in comparison to passing through "unspoilt" countryside.	As above
Local vs national need	Zone 6a. A feeling that the project brought no substantive benefits to the residents of Dumfries and Galloway themselves. Impacts were considered "unacceptable" for the export of power for the Scottish Government.	See section 6.2 under ***Local vs national benefit***
	Comments that the project was for national, rather than local needs, and should be costed as such.	As above

	Concerns that the benefits would be minimal, but the long term disadvantages great, also concerns about the disruption due to construction.	See paragraphs 7.7.19 to 7.7.25 under ***Disruption during construction***
	A belief the need for transmission infrastructure was falling in Dumfries and Galloway due to local improvements in housing and energy efficiency.	See paragraphs 6.4.4 to 6.4.9 under section ***The case for increasing transmission capacity***
Cost	Comments that SPEN should have provided information on the cost of the project and in particular the comparative costs of strategic options such as subsea and undergrounding.	See the responses within section 6.9 ***Cost***
	A belief that the option of developing an overhead line had been made on the basis of cost alone.	As above
	Comments that cost to communities was an important consideration and some call for a solution which causes least impact.	As above
	Belief that, considered over the 40-year lifespan of the equipment, the additional cost of mitigating measures would not be so great.	As above
	Request for a full cost-benefit analysis taking account of loss of residential amenity, property values and the financial damage to the tourism economy, sense of place and well-being.	As above

	Suggestion that SPEN should fund the extra cost out of its profits or that some of the money Scottish Power earned from exporting electricity to other countries could be used to protect Dumfries and Galloway.	As above
	Suggestion that money saved in constraint payments to wind farms could be used.	As above
	Belief that Ofgem had a fund to help companies like SPEN mitigate the visual impact of schemes like DGSR.	See paragraphs 6.9.30 to 6.9.33 under ***Sources of funding for mitigation measures***
	Reference to research showing consumers are willing to pay a premium on household energy bills over an extended period in order to avoid overhead lines and towers.	See paragraphs 6.9.24 to 6.9.27 under ***Cost to consumers***
ROUTEING AND SITING		
Routeing methodology	Comments that SPEN had not justified the study area it had used for identifying potential corridors. Concern documentation did not show the SW Scotland line which is currently under construction, and a belief this could have been extended to the M74 to join an existing interconnector to Harker.	See paragraphs 7.2.10 to 7.2.15 under ***General comments on routeing and siting appraisal*** See the responses within section 6.5 ***Strategic options***
	Concern that the methodology seems to favour locations of ecological value rather than places people lived.	See paragraphs 7.2.10 to 7.2.15 under ***General comments on routeing and siting appraisal***

Environmental impacts	References to cultural, artistic, literary and historical heritage, archaeological sites, listed buildings, and features of historical interest in the area. Comments that protecting the setting of such attractions for visitors was vital; belief that the majority of the public find towers and overhead lines unacceptable.	See paragraphs 7.3.34 to 7.3.36 under ***Treatment of historic and cultural sites*** and the responses within section 7.4 ***Landscape and amenity***
	Concern that the project in its current form could harm wildlife and birdlife.	See paragraphs 7.3.25 to 7.3.30 under ***Biodiversity***
Visual impacts	Concern about the widespread visual impact caused by an overhead line, over a large area described as some of the "finest in the country". The proposed height of the new 400kV towers was a particular concern to Keir, Kelton and Kirkmahoe councils. Concern about the impact on scenic tourist routes, the Tinwald Hills and Torthorwald Ridge.	See the responses within section 7.4 ***Landscape and amenity.*** However, the specific areas mentioned are not part of the KTR Project and are therefore no longer affected.
Socio-economic impacts	Concern that an overhead line could negatively impact the tourist industry, which was seen as an increasingly important part of Dumfries and Galloway's economy, especially with the perceived decline in agricultural jobs.	See the responses within section 7.5 ***Socio-economic impacts***
	Impact on farming and agriculture as well.	As above
	A feeling that local councils had encouraged tourism, such as producing brochures and devising planned and sign-posted local walks. In Kirkmahoe these walks looked south towards un-spoilt views of Criffel and the Cumbrian Hills.	As above. However, the specific areas mentioned are not part of the KTR Project and are therefore no longer affected.

	Concern about the potential impact of the project on property prices in the vicinity of towers.	As above
	Concern about the impact of uncertainty on the property market, for instance people finding it difficult to sell their homes or land, until the final outcome was clear. It felt this would cause anxiety and was one of the negative factors SPEN should take into account.	As above
Health, safety and security	Concern among residents about the possibility of harm to their health.	As above
	Concerns about low flying aircraft training.	As above
	Concerns about noise from new infrastructure.	As above
	Safety concerns about crossing the paths of two underground gas pipes in Kirkmahoe parish.	This area does not form part of the KTR Project and is therefore no longer affected.
Engineering, design and construction	Comments that local road infrastructure not suitable for construction vehicles.	See paragraphs 7.7.19 to 7.7.20 under ***Disruption during construction***
	Concern that disruption during construction would affect businesses and local people.	As above
	Comments that SPEN had not provided information on the impact of the scheme on existing pole-mounted distribution lines	See paragraph 7.4.11 in section ***Landscape and amenity***
SPECIFIC ZONE AND SITING AREA RESPONSES		
Zone 2	Comments that the preferred corridors for the new 400kV line should replicate the route of the existing 132kv line. Concern that the	Zone 2 does not form part of the KTR Project and is therefore no longer affected.

	introduction of much bigger structures in new locations would "intrude" on the landscape including areas such as Queens Way and Galloway Forest Park.	
Zone 3	Objection to the re routeing of the existing line from the east side of Loch Ken to the west side, which would bring it closer to towns and villages and the A762 which was stated to be popular with tourists visiting the Glenkens. Concerns reported from residents that property prices will be negatively affected and the tourist trade will suffer. There was particular concern as to how close any revised route would be to the communities of Polmaddie and Dundeugh.	See the responses within section 8.2 ***Zone 3*** As above
	Comments that the line should be within a corridor much further west away from the villages and roads.	As above
Zone 4	Concern that the new substation being proposed near the village would be a pinch point of five new connections in an environmentally sensitive area. Preference for a like-for like replacement and for all lines to be undergrounded.	See the responses within sections 8.3 ***Zone 4***
Zone 5	Concerns about perceived errors and inconsistencies in the appraisal methodology for selecting preferred corridors as outlined in SPEN's *Routeing and Consultation Document*.	Zone 5 does not form part of the KTR Project and is therefore no longer affected.

	These were identified as: an error in the description of the length of preferred corridor G/D 3 in one of the tables; the omission of site D6 in the section on ancient woodland; inappropriate use of buffer zones and trigger areas; over-protection of RSAs; inconsistent use of consideration for wildlife on the Solway, which is given greater weight in corridor assessments near Dumfries than for the substation siting area near Collin. Corridor lengths were difficult for local people to assess and compare because it was not clear from the documentation where the various G/D corridors ended and the D North and D South began.	As above
	A feeling that the project should be further from residential areas at Dunscore, Milton, Throughgate and Glenmidge on ground of general amenity.	As above
	Concern that an area running either side of the B729 road, next to the published corridors, was excluded from consideration. This area was perceived to be suitable for inclusion and it was suggested that this omission could have affected the way the corridors were assessed by moving them out of Regional Scenic Areas.	As above
	Difficulties were reported in understanding the reasoning behind the selection of the preferred corridors from the data presented.	As above

Environment	Concerns about alternative corridors G/D 1and 2 saying the appraisal had omitted significant research and information pertaining to cultural, heritage and archaeological sites and had underestimated the flood risk.	As above
	Preference for corridors G/D 6 and D South and using existing tower routes and the industrial corridors of M74 and A75 rather than building in an unspoilt area.	As above
	Preferred corridor G/D 3 was felt to be unsuitable due to a narrow pinch point by Crawston Hill.	As above
	A feeling that the corridor should be further from residential areas at Burnhead and Courthill Park on grounds of general amenity.	As above
	Comments that line routes should avoid the village of Dunscore on the grounds of general amenity and should be undergrounded in this section to avoid a skyline view.	As above
	Concern that a loch by Maxwelton estate in corridor G/D 1 and 2, important for birds, had not been mapped or surveyed. It was felt that lines in this corridor would be a collision risk for birds, if it were chosen.	As above
	Areas reported as important for wildlife · Loch Urr (black headed gull, whooper swans, barnacle geese, pink footed geese, greylag geese, broadleaved woodland) · SSSIs at Jericho Loch and Locharbriggs · Crory Wood (local nature reserve, wetland and native wooded area)	As above

	· Fields next to the Coldside Road · Ae Forest and the Nith · Laggan Burn	
	Concern about the potential loss of trees and habitat for red squirrels and bats if any felling were to take place in woodland around McMurdoston, Allanton, Glenmidge, Porttrack and Crory Wood. Concerns that loss and fragmentation of habitat by infrastructure would affect biodiversity and would interfere with migration routes, breeding grounds and feeding areas.	As above
	Concern over the impact of overhead lines on migratory geese, heron populations, red kites and very large numbers of migratory swallows around Kirkmahoe and in the Nith valley.	As above
	Concerns about raptors and large water birds colliding with overhead transmission lines; wildlife including otters, bats, migrating geese, whooper swans, hen harriers, skylarks, meadow pipits, whinchats, red kites, goshawks and other red and amber listed species locally.	As above
	Concerns about the impact of the project on sites of cultural heritage, in particular those associated with Robert Burns and Thomas Carlyle: not given enough weight in SPEN's assessments. These included: · Ellisland Farmhouse and Steading and Burn's Hermitage in the grounds of Friars'Carse · Portrack Garden of Cosmic Speculation · Allanton Peace Sanctuary	As above

	· Portrack or Old Dunscore graveyard · Lag Tower · Crory Wood · Church and manse built by Dr Robert Brydon · Craigenputtock · Springfieldhill Iron Age fort · Beacon points on Crawston and Coldside · Scheduled ancient monument of Moat · Crannog on Carse Loch · Listed buildings and enclosures at Kilroy, McCheynston farmhouse and Windsover Cottages	
	Several archaeological sites were said to be missing from the appraisal of alternative corridor G/D 1 and 2 including a neolithic circus opposite Kirkland Church.	As above
	Comments that placing towers along the unspoilt preferred corridor would be hugely visually intrusive due to it being a sparsely populated area of huge scenic sensitivity and recreational value, especially for cycle tourism.	As above
	Comments that the valley of the Laggan Burn was already an extensive wirescape due to existing lines.	As above
	Concerns about the impact on the settings of Castramon Hill and Loch Urr.	As above

Socio-economic	Several places and events were identified as important for tourism: · A number of holiday cottages · Friars' Carse hotel and wedding venue · McMurdoston House · Cycle way to Courthill Smithy, Keir Mill · Spring Fling is Scotland premier Arts event · Woodland walk and a longer community walk in Auldgirth · Core path to the viewpoint on Crawston Hill	As above
	Concerns raised over the dangers high towers would pose to military aircraft in a tactical training area low fly zone.	As above
	Comments that the area had a record of earthquakes.	As above
Health, safety and security	Concern about potential noise from overhead lines and the risk of light pollution in an area recognised for its dark skies.	As above
	Concerns about potential health impacts linked to electric and magnetic fields (EMFs).	As above
	Concerns about increasing local flood risk, due to increased rain water run-off caused by soil compaction and tree-felling. Areas identified as being prone to flooding were: · A 2km section in the area between Moniave and Dunscore in alternative corridor G/D 1/2. · Laggan Burn	As above

Engineering, design and construction	There were general concerns about the potential disruption caused during construction and a specific concern about the potential for construction activities to affect water supplies from the Dumfries aquifer	As above
Zone 6a **Environment**	Concern about the potential risk an overhead line in the vicinity of Caerlaverock nature reserve would pose to migratory birds, especially in the dark.	Zone 6a does not form part of the KTR Project and is therefore no longer affected.
	Concern about the impact on area historically associated with the Reivers and Thomas Carlyle. A number of historical features worthy of consideration: · Iron Age fort at Burnswark · Roman remains at Birrens and Burnswark · Middlebie parish	As above
	Concerns about the visual impact of towers in an area of large open valleys, rolling hills and mountains which were perceived to be vulnerable to a large structures.	As above
	Comments that the area already has a lot of infrastructure including an existing 400kV overhead line and a number of wind farms.	As above
	The elevated view from Carrutherstown, over the Solway Firth to the Lake District was identified as being of particular value to tourists and residents.	As above

Socio-economic	Several places considered as important for tourism were identified as needing more consideration in SPEN's assessments: · Hetland Hotel, Hetland Garden Centre and Tea Rooms · Hoddom Castle and caravan park · Repentance Tower and associated views · Barhill and associated views · Burnswark Roman station	As above
	Concern over impact on possible development of Hoddom Castle caravan park due to its standing as a revenue earner and employer for the area.	As above
Health, safety and security	Concern over the electric and magnetic fields generated by high voltage power lines and the impact these could have on human health, as well as the risks associated with building in an area designated as a military low fly zone.	As above
Engineering, design and construction	Query over numbers of 400kV lines to cross the existing 400kV and whether it will be a 'flyover' which was felt unacceptable.	As above
	Concern that narrow and twisting roads would be unsuitable for construction traffic.	As above

Zone 6b	Opposition to the building of a new overhead line on the basis of visual amenity, with particular concern about the height of the proposed towers. Support for subsea option, or undergrounding, or keeping to the route of the existing 132kV line.	Zone 6a does not form part of the KTR Project and is therefore no longer affected.
Environment	Comments that more consideration should be given to cultural and heritage features such as the listed Kirkandrews Church and Kirkandrews Tower and the historic Scots Dyke, which is crossed by the preferred corridor.	As above
	Concern about the risks posed by overhead lines to wildlife and especially birds, including mute swans, greylag and Canada geese and thousands of other migratory geese.	As above
	Comments that the A7, which is crossed by the preferred corridor, should be taken into account.	As above
Health & safety	Concern about the risks of high towers to low flying aircraft to and from the ranges at Spadeadam.	As above
Substation siting area near Newton Stewart	Concern that preferred siting area NS5 had been selected for financial reasons and would have an adverse effect due to its proximity to Challoch church and an area considered to be environmentally sensitive. Concern about the siting area's potential adverse impact on tourism, wildlife and water system.	This area does not form part of the KTR Project and is therefore no longer affected.

Substation siting areas near Glenlee	Concern about proximity of substation siting area G2 to the village of Dalry.	The KTR Project includes plans to extend the existing substation at Glenlee, therefore siting area G2 is no longer being taken forward
Substation siting areas near Dumfries	Concern over the siting area D4 near Racks; request information on why needed, its size, it location in proximity to Racks, Mouswald and the Lochar Moss and screening.	This area does not form part of the KTR Project and is therefore no longer affected.
CONSULTATION AND INFORMATION		
General	Concern at the consultation process; particularly the selection of preferred siting NS5.	See paragraphs 9.2.17 to 9.2.21 under ***Meaningfulness of consultation.*** This area is no longer affected. It does not form part of the KTR Project. In particular, there is no substation now proposed near Newton Stewart.
	Comments that decisions appeared to have been taken before consultation started. A number of councils referenced a feeling that people were being consulted several years after SPEN started work on the scheme. Suggestion this was in breach of the Aarhus Convention.	See paragraphs 9.2.17 to 9.2.21 under ***Meaningfulness of consultation***
	A feeling that local councils should have been contacted before the publication of the preferred corridors.	See paragraphs 9.2.35 to 9.2.38 under ***Approach to stakeholders***
	Concern that SPEN's response to the consultation will only be available on line as some local people either do not have internet connections or would struggle to download large documents with slow broadband speeds. Requests for paper versions of this document are made available so all residents may read them.	See paragraph 9.5.15
	A much wider area than just people living within a kilometre of the preferred corridors should have been informed of the consultation, as it would affect many more people.	See paragraph 9.2.27 under ***Area of consultation***

Consultation process	Requests for information on what would happen if preferred route was dropped and another one chosen and whether the consultation process would re-start in such a situation.	Please see Chapter 11 ***SPEN's conclusions following the first round of consultation*** for our conclusions and the confirmation of proposed corridors for the next stage of consultation
	Concern that some households did not receive the consultation newsletter.	See paragraph 9.3.6 under ***Launching the consultation***
	Concern that residents of Courthill Park had been left out of the consultation mailing.	This area does not form part of the KTR Project and is therefore no longer affected.
	Feeling that the timing of the consultation was inadequate during the school summer holiday period when people are away and some community councils are in recess. Belief that the consultation was too short.	See paragraph 9.3.15 under ***Timing and duration of the consultation*** See the responses within section 9.4 ***Consultation materials*** As above
	A feeling that the information supplied was insufficient and misleading.	See paragraphs 9.2.35 to 9.2.38 under ***Approach to stakeholders*** and 9.2.43 to 9.2.46 under ***Level and amount of detail***.
	Concerns over difficulties accessing the project documentation online due to the size of the documents and slow internet access. Belief that hard copies of the routeing documents should have been given to each community council for residents to access.	See the response within section 9.4 ***Consultation materials*** As above
	Feeling that locations for information offered limited access at evenings or weekends.	As above
Consultation materials	Belief that maps available at the exhibitions were more detailed than those contained within the online consultation documents.	See paragraph 9.4.35 under ***Maps***
	Comments that materials at the exhibitions were unhelpful and that maps piled on tables were difficult for people to access.	This has been noted

Suggestions for future rounds of consultations	Comments that, although the quantity and detail of information was generally very good, the detail on the preferred corridors, which needed to be specific, was vague.	As above
	New Luce Community Council requested to be included in any future consultations. Arthuret Parish Council requested SPEN give a progress report at one of its monthly meetings.	These areas do not form part of the KTR Project and are therefore no longer affected. However, the councils are urged to contact SPEN if they would still like further information.

Appendix D: Summary of responses from local interest organisations and groups

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Section	Issues & Questions Raised	DGSR Response
NEED CASE & STRATEGIC OPTIONS		
National and local policy **DECC'S announcement on subsidies**	Comments that SPEN's current proposal should be reviewed in light of the announcement by the Secretary of State for Energy and Climate Change, the Rt Hon Amber Rudd MP to end the public subsidy for on-shore wind.	See the response within section 6.2 on ***DECC's announcement on subsidies***
	A feeling the cessation of subsidies will materially affect the amount of network capacity needed as well as substantially changing the location of generation.	As above
Changes in local planning determinations for wind farms	Belief that decisions by Dumfries and Galloway Council and the Scottish Government to refuse permission for various wind farms would reduce significantly the development of wind farms and in consequence the need for extra transmission capacity.	See the response within section 6.2 on ***Changes in local planning determinations for wind farms***
	Comments that an application for Knockendurrick wind farm had been downsized and three more applications had been refused permission and now at appeal.	As above

The case for replacing ageing infrastructure	Queries over SPEN's assertion that the network needed to be replaced because it was old. Comment that SPEN had sufficient confidence in its ability to maintain the network to agree a target with Ofgem until 2021. A feeling that, just because a transmission network is old does not necessarily mean it needs to be replaced.	See the response within section 6.3 ***The case for replacing ageing infrastructure***
The pattern of renewable development	Belief that, if the generating capacity was limited following the Government's recent announcement on cessation of subsidies, SPEN had flexibility for an alternative scheme to improve the visual impact and reduce economic loss. Belief that the area around Glenluce and Kendoon would see the largest increase in renewable generation with areas to the east of the region remaining similar to today.	See paragraph 6.4.21 under ***Pattern of renewable development***
	A feeling that predominance of developments in the northern periphery of the region do not merit the corridors selected and that alternatives should be developed further north to reflect the areas of renewable generation and the interconnector requirements.	As above
	A view that SPEN should consider whether the route of the line will influence site choice for new energy developments, as the proximity to grid development is a key factor in site selection.	See paragraphs 6.4.4 to 6.4.9 under ***The case for increasing transmission infrastructure***
Subsea	Calls for SPEN to consider a subsea route, which was considered less damaging from a visual amenity point of view.	See the responses within section 6.5 ***Strategic options*** and under section 6.9 ***Cost***

	Feeling that SPEN had not provided adequate information on the financial aspects of alternatives to justify their proposal for an overhead line. Belief the cost of a subsea cable was supportable when overall costs and the potential impact on communities were taken into account.	See section 6.5 ***Strategic options***
	Comment in favour of a subsea HVDC link of around 1,000MW between Auchencrosh and the Lancashire coast. Auchencrosh was cited as a suitable landing site away from environmentally sensitive regions which would also minimise the need for additional infrastructure due to SPEN's plans to construct a new 275kV network between Newton Stewart and Auchencrosh. It was felt that the presence of the existing Moyle interconnector in this area would mean the addition of a second HVDC converter station would minimise any additional environmental impact compared to alternative sites.	As above
	It was stated that the advantage of this proposal is that electricity flow to Northern Ireland can be taken from generation in the west of the region while flow from Northern Ireland and any excess generation in the region can go directly south through the sub-sea link to centres of demand thereby reducing transmission losses. This, it was stated, leaves the proposed west-east transmission network less heavily loaded to the point where it may be possible to downgrade from a 400kV super-grid to a 132kV network between Newton Stewart and Harker having between 350-500MW capacity. At 132kV, towers are lighter,	As above

	smaller and cheaper as is the rest of the infrastructure, leading to less visual Impact.	
	It was further stated that, at this voltage, there is greater flexibility to accommodate undergrounding as the cost escalation factor approaches unity (25] compared to the equivalent cost of a 400kV overhead line network. It was calculated the additional cost of such an option at £552m, or £500m is only half the 132kV network was undergrounded. It further suggested that this figure would equate to an additional cost in the order of £3.85 per annum on the typical household's electricity bill.	As above
Undergrounding	Support for underground cables in preference to an overhead line on the grounds of visual and residential amenity, the environment and protection for the region's tourism industry.	See paragraphs 6.7.10 to 6.7.17 within section 6.7 ***Undergrounding***
	Support for undergrounding the entire line, or at sensitive locations or in conjunction with a subsea cable.	As above
	Support for placing new cables underground along the route of the existing transmission network, or close to roads, which, it was felt, would allow for easier access for maintenance and repair.	As above
	Concern that an overhead line would affect a "unique environment and special nature" and that the cable should be buried if the preferred corridors were chosen.	As above

	Comments that undergrounding should be given serious consideration through any agricultural land.	As above
	Belief that undergrounding the smaller 132kV lines, such as in Zone 3, was relatively cheap and easy, requiring a smaller trench, and that the land healed quite quickly afterwards. It was further felt that planning consent for such an approach would be easier to obtain and that Ofgem tended to authorise it, mentioning a number of precedents such as the undergrounding of 132kV lines in the Stirling area following a public inquiry into the Beauly to Denny line.	As above
	There was a view that placing cables underground eliminated electric fields and reduced the spread of magnetic fields meaning fewer health impacts from power line electromagnetic fields (EMFs).	As above
	Feeling that cost was not a reasonable argument against undergrounding when landscape, communities, individual households and the vital tourism industry were taken into account.	See paragraphs 6.9.7 to 6.9.12 within section 6.9 ***Cost***
	A feeling that the line in Zone 2 should be placed underground.	Zone 2 does not form part of the KTR Project and is therefore no longer affected.

	Acknowledgement that undergrounding SPEN's entire proposed 400kV line may not be technically possible but a feeling that sections of the new network may be undergrounded to avoid sensitive areas. Estimated additional cost of undergrounding sections totally half of the entire route would be £508m.	As above
Refurbishing or upgrading the existing line	Feeling that insufficient consideration had been given to upgrading the existing network in line with Holford Rule 1.	See the responses within section 6.8 ***Refurbishing or upgrading existing infrastructure***
	Comments that new cables should be built along the routes of the existing transmission network.	See paragraphs 7.2.45 to 7.2.49 under section ***Consideration of corridors containing existing lines***
Local v. national need	Feeling that project brought little local benefit to Dumfries and Galloway; that the area enjoyed high levels of reliability and availability of electricity supply already.	See paragraphs 6.2.20 to 6.2.22 under section ***Local vs national benefit***
	Feeling that the area was being used by SPEN as a conduit.	As above
Cost	Concerns that SPEN failed to provide information on the comparative costs of alternative mitigating options such as subsea or underground cables and had not proved the economic viability of the project in accordance with its statutory duties.	See paragraphs 6.9.7 to 6.9.12 within section 6.9 ***Cost***

	Comments that cost comparisons between overhead lines and other alternatives should be considered over the lifetime of the asset. Comment that traditional appraisals based on simple capital costs suggested that the cost of undergrounding a 400kV line is seven to 15 times more than an overhead route, but that more recent studies of whole life-cycle costs suggested that the average additional cost of undergrounding is about 4.6 times more.	As above
	Reference to a belief that Ofgem are allowing companies like SPEN to spend money to underground existing overhead lines in certain areas and the same should be done in Dumfries and Galloway. It was stated that Ofgem, under its price control mechanism TIIO-T1, limits the amounts transmission operators can recover costs and earn a reasonable return on capital subject to them delivering value for consumers, behaving efficiently and achieving targets.	As above
	Comments that energy companies could fund additional cost of mitigating the project from their profits.	As above
	Suggestion that consumers are willing to pay extra on their electricity bills to mitigate the impact of overhead lines on visual amenity and natural heritage. Large-scale qualitative and quantitative research by National Grid was quoted which suggested people had more appetite to pay to mitigate the visual impact of future infrastructure rather than existing infrastructure.	As above

ROUTEING AND SITING		
Routeing methodology	Concerns that undesignated landscapes of high value had been undervalued and that SPEN had failed to demonstrate that it had met its duties under Schedule 9 of the Electricity Act.	See paragraphs 7.3.34 to 7.3.36 under ***Treatment of historic and cultural sites***
	Feeling that decision to present a single preferred corridor could set communities in corridors against each other.	See paragraph 9.2.38 under ***Approach to stakeholders***
	Request to see more detailed routes as soon as possible in order to be able to assess the impacts in detail.	See paragraph 9.2.43 under ***Level and amount of detail***
	Request SPEN make sufficient effort to ensure all landowners are made aware of proposals. Belief that SPEN will try to select a route utilising the Holford and Horlock rules but felt the present proposal will inevitably lead to economic loss which residents of the region will be expected to bear.	See paragraph 9.3.7 under ***Launching the consultation*** See paragraphs 6.9.18 to 6.9.21 under ***Cost-benefit analysis***
Environmental impacts	Request for SPEN to minimise the impact of the proposals on the built and natural environment, due to perceived potential loss of historic and cultural heritage and possibly destructive environmental impacts to flora, fauna and wildlife.	See paragraphs 7.3.8 to 7.3.13 under ***Environmental impacts***

	Belief the area has the only area of designated wild land south of the central belt and is home to a wide range and abundance of key species and habitats Comment that the area is important for and is enjoyed by an increasing number of people.	As above
	Request for further engagement on the project's need to cross many watercourses and the need to protect important fish populations.	See paragraph 7.7.28 under ***Hydrology***
	View that overhead lines and towers affected visual amenity and that more needed to be done to protect Dumfries and Galloway from an increasing amount of infrastructure. There was a reference to Galloway being one of seven areas in Scotland identified as meriting national parks status in the Scottish Campaign for National Parks' 2013 report *Unfinished Business*.	See the responses within section 7.4 ***Landscape and amenity*** See paragraph 7.2.14 under ***Routeing Methodology***
Socio-economic impacts	Concern about the impact of the proposed overhead line on the region's tourism industry, which was seen as important to the Dumfries and Galloway economy supporting thousands of jobs. Quote that a ten percent reduction in tourism income would equate to a loss of over £500m to the regional economy over the 40 year lifespan of the project.	See paragraphs 7.5.7 to 7.5.10 under ***Tourism***
	Concern the project could de-value land and property, with the prediction that even though most people will recognise the necessity they will oppose it simply because of the potential impact it may have on them their family and their livelihoods.	As above

	Request for SPEN to consider lower towers or better tower design.	See paragraphs 7.7.5 to 7.7.8 under ***Tower design and technology***
SPECIFIC ZONE AND SITING AREA RESPONSES		
Zone 1	Concern about the area around the Lower Cree, near Newton Stewart, where there are large areas of woodland, which were felt to be sensitive. Strong favour of undergrounding, believing the new higher tower design and the new substation to be unacceptable on the grounds of visual amenity and the impact on tourism.	Zone 1 does not form part of the KTR Project and is therefore no longer affected.
	Opposition to any line routes through woodland due to the impact on biodiversity and the landscape. Keen that SPEN avoid Barclay and Wood of Cree or Knockman Wood due to the need to clear a considerable amount of recently established woodland.	As above
	Comment that the best route would be south of the river Cree and join to the existing line west of Newton Stewart, which was felt was also the best place for a substation. A feeling that a new line down from Knowe to Challoch should link to the existing line to the west of Newton Stewart and try to avoid any known nightjar breeding sites.	As above
	Comments that SPEN should use established and maintained cleared routes through the forest in Zone 2 to minimise impacts on the environment and believed the only deviation should be at Bower Drive in Minnigaff, where a short detour north, away from homes, was felt preferable.	Zone 2does not form part of the KTR Project and is therefore no longer affected.

Environment	A number of designated and undesignated rivers whose considered important both for economic and biodiversity reasons were highlighted. These were: the River Luce, River Bladnoch, River Cree, Kirkcudbrightshire Dee, River Urr and Border Esk. Concerns about various impacts during the construction and decommissioning of lines.	See paragraph 7.7.28 under ***Hydrology***
	Concerns about potential impact on Lochs Ochiltree and Fyntalloch - an unspoiled very rural area.	Zone 1 does not form part of the KTR Project and is therefore no longer affected.
	Concern about the height of the new towers and the associated cables for migrating geese and swans and that wires should be very well marked to avoid bird strikes.	See paragraph 7.3.27 under ***Biodiversity***
	Request for SPEN to incorporate raptor nesting platforms into any new tower, with a view to enabling ospreys to nest more widely across the region.	The suggestion about raptor nesting platforms has been noted. Mitigation requirements and enhancement opportunities will be discussed with relevant statutory and non-statutory consultees once the line alignment and the substation sites are confirmed.
Engineering, design and construction	Concern about impacts during the construction and decommissioning of lines. Freshwater pearl mussels and their habitats were felt at risk during the construction phase due to potential impacts.	See paragraph 7.3.10 under ***Environmental impacts***
Zone 2	Comments in respect of Zone 1 also apply in Zone 2.	Zone 2 does not form part of the KTR Project and is therefore no longer affected.
	The removal of lines in Zone 2 welcomed, as long as they were replaced underground.	As above

Environment	Concern over the impact on Glenmalloch Lodge, a Category B listed 19th century building located near Minnigaff; request for further information as to whether this building will be directly affected or subject to an additional survey	As above
Zone 3	Comments that the new line should be to the east of the existing and put underground where possible, including where it crosses the A75.	See paragraphs 8.2.22 to 8.2.23 under ***Zone3***
	Concerns that the preferred corridor was so narrow in an area close to where people lived when a number of other corridor options existed. Feeling that undeveloped landscape was deserving of protection. Undergrounding was suggested on the grounds of residential amenity.	As above
	A reference that SPEN's DGSR *Routeing and Consultation Document* fails to refer to the Laurieston landscape unit which was identified as having high and medium high landscape sensitivity. Respondents pointed out that, according to the *Dumfries and Galloway Wind Farm Landscape Capacity Study (2011),* such areas should be excluded from search areas for wind turbines and suggested that the same should apply to towers.	As above
	Comments that the project appears to be in conflict with Policy NE2 of the Local Development Plan regarding Regional Scenic Areas.	See paragraph 6.7.23 under ***Planning considerations***

	Alternative suggestions	
	Feeling that varying preferred corridor G/T 2 through the region's very extensive forestry plantations would cause less environmental adverse impact due to lower numbers of homes, as well as opportunities for screening and improving biodiversity.	See the responses within section 8.2 ***Zone 3***
	Suggestion of hiding the power line using the forest plantation west and then south of Stroan Loch and then the plantation north and west of Airie hill, avoiding sky-lining where possible. Respondents felt varying corridor G/T 1 through the huge forest plantation to the west of Loch Skerrow to potentially south of the White Top of Culreoch and from there west into the Laurieston Forest plantation north of Loch Whineon, undergrounding where necessary, resulting in no impact on the NSA.	As above
	Suggestion that varying corridor G/T 4 to explore options along the existing 132kV line which take the line further from residences should be considered along with potential for undergrounding.	As above
Environment and visual	Crae Hill and Lands of Drumwhill were identified as valuable for both biodiversity, wildness and visual.	As above
Socio-economic	Concerns the project could affect tourism in Zone 3 and jeopardise the potential viability of the important local shop at Mossdale.	As above

Zone 5	Perceived issues with SPEN's routeing methodology in Zone 5, specifically the use of Holford Rule 2 to focus solely on designated landscapes, to the detriment of internationally important undesignated landscapes such as Portrack Garden of Cosmic Speculation and the house and garden at Dunesslin. There were further concerns about the way landscape capacity had been categorised and weighted, and that corridors had not been compared with each other in this respect.	Zone 5 does not form part of the KTR Project and is therefore no longer affected. See paragraphs 7.4.24 to 7.4.27 within section 7.4 ***Landscape and amenity***
	Concerns that, by leaving decisions on undergrounding until later in the process, SPEN would discount potential routes early on which could be made acceptable by undergrounding. Suggestions that areas of Zone 5 should be considered for undergrounding.	See paragraphs 6.7.10 to 6.7.17 within section 6.7 ***Undergrounding*** Zone 5 does not form part of the KTR Project and is therefore no longer affected.
	Requested further consideration be given to replacing the existing network between Glenlee, Tongland and Dumfries on the grounds that the preferred corridor G/D 3 would have "unacceptable" landscape and visual impacts.	Zone 5 scheme does not form part of the KTR Project and is therefore no longer affected.

	Opinion that the appraisal of corridor options did not justify the selection of the preferred corridor. A number of errors in the *Routeing and Consultation Document* were suggested, such as the application of a 10km buffer around NSAs, the omission of Cowhill GDL and Torthorwald RSA from the appraisal for corridor G/D 3, the incorrect assertion that corridor G/D 3 is the shortest corridor in one part of the R&CD, failure to identify the area is a tactical low fly zone, the presence of gas pipelines in Tinwald or Cowhill estates and Roucan Loch crematorium.	Zone 5 does not form part of the KTR Project and is therefore no longer affected. However, see paragraphs 7.2.19 to 7.2.21 under ***Use of trigger zones and buffers***
	Request for care when removing existing overhead lines in Zone 5 and recommended consultation with NDSFB when working within their jurisdiction.	Zone 5 does not form part of the KTR Project and is therefore no longer affected.
	Request SPEN carry out a full assessment of the impact of any development on the setting of Grade A listed Dunscore Church in line with guidelines laid down by Scottish Heritage. This would include visual envelope taking account of views to and from the church.	As above

	A number of other cultural and heritage features were identified as requiring careful consideration by SPEN. These included: · Ellisland Farm: Burns farmed and wrote a quarter of his poems and songs there · Portrack Graveyard is listed and has the grave of Lagg · Cycle way to Courthill Smith at Keir · Setting of Springfield Roman Fort · Beacon points on Crawston and Coldside, distinctive landscape features · Roman cavalry fort at Carzield · Roman forts at Dalswinton · Craigenputtock Farm near Dunscore · Dunscore Church	As above
	Feeling that visual impacts have not been sufficiently taken into account in the selection of the preferred corridor, including the settings of designed gardens and landscapes at Portrack House, Dalswinton and Friars Carse, Cowhill Tower and Duncow House.	As above
Environment	Concerns that a view from Dunscore church would be affected by a potential route of towers going straight across it.	As above
Socio-economic	Concerns that towers would have an impact on tourism, which was considered an important, but fragile, part of the local economy.	As above, but also see paragraphs 7.5.7 to 7.5.10 under ***Tourism***

	Specific tourism features and events were identified, such as: • Ellisland Farm: Burns farmed and wrote a quarter of his poems and songs there • Portrack Garden of Cosmic Speculation • Allanton World Peace Sanctuary and festival • Friars' Carse Hotel and Wedding Venue • Cycle way to Courthill Smith at Keir • Core path onto Crawstone Hill • Community and Woodland Walks • Moniaive Festival Village • Setting of Spring Fling	Zone 5 does not form part of the KTR Project and is therefore no longer affected.
Health and safety	Concerns about low flying aircraft regularly using flight paths through Kirkmahoe.	As above
	Concerns about the possible impact of the project on health and well-being and concern about potential noise.	As above
Zone 6a	Feeling the proposals which would have an detrimental impact on Roucan Loch Crematorium, unless it was placed underground. Roucan Loch was highlighted as a nature reserve.	Zone 6a does not form part of the KTR Project and is therefore no longer affected.
	Suggestion to construct towers along the existing route on the Old Military Road with a sub-station created at the site of the old ICI chemical works at Cargenbridge.	As above

	Concerns about the impact of overhead lines on a landscape considered important for its cultural, literary and built historic heritage, which in turn supported an important tourist industry. A number of historic features, including those associated with Thomas Carlyle and other literary figures, were identified, such as: • Arched House in Ecclefechan • A small farmhouse on Repentance Hill • Craigenputtock Farm near Dunscore • Barhill and Burnswark • The Tower of Repentance • Hoddom Castle • St. Kentigern's graveyard • medieval settlements and pilgrimage route	As above
Zone 6b	Concerns about the impact on Kirkandrews church and its setting, which were considered a tourist asset and potential visitor destination.	Zone 6b does not form part of the KTR Project and is therefore no longer affected.
	Feeling that existing high voltage transmission line through the area had been sited to minimise intrusion and detrimental impact on views from the Church and was well accommodated into the landscape. There were concerns that SPEN's appraisal process lacked information about minimising the impact of the line on the Grade II* Church and had failed to take account of the A7 as a scenic route used by tourists.	As above

	Concerns that SPEN had not taken into account the vulnerabilities created by expanding the concentration of key infrastructure at the Harker Sub-Station which already included the M6 with its feeder routes the M74 and A75 and the West Coast Main Railway.	As above
	A number of important heritage features were identified in Zone 6b, which it felt required careful consideration. • Kirkandrews Church • Kirkandrews Pele Tower • 18th century Gothic Folly the Co-op House • A narrow suspension footbridge constructed in 1877 • Netherby Hall, including evidence of pre Roman activity • Remains of earthwork castle at Liddel Strength • Scotsdyke	As above
	Netherby Woods, and the Fir Plantation were also identified as areas worthy of protection.	As above
	There were concerns that noise from new infrastructure could interfere with the use of Kirkandrews Church as a place of worship and a venue for musical and other events, which could affect fund-raising.	As above

Substation siting areas near Newton Stewart	Objections to the selection of preferred substation siting area NS5 on the basis of impact on the context of the historic church at Challoch. Feeling that the area should be tested in terms of the impact on views, landscape, biodiversity, cultural heritage, and the way the land is used.	This area does not form part of the KTR Project and is therefore no longer affected. No substation is therefore proposed
	Reference to potential disruption to the church and churchyard, and noise, as well as health concerns attributed to overhead cables	As above
	Choice of siting area was considered unacceptable in an area which respondents felt relies on "the beauty of its landscape for its vital tourist industry". A view that the line in Zone 1 should remain south of the river Cree and join the existing line west of Newton Stewart.	As above
CONSULTATION AND INFORMATION		
	Feeling that consultation should have taken place earlier at the strategic options stage, possibly during political decision-making in the National Planning Framework. Feeling that consultation should have been conducted on the other possibilities of generating sustainable energy, and how to move it around the UK.	See paragraphs 9.2.18 to 9.2.21 under ***Meaningfulness of consultation***
	A belief that the consultation for NPF3 indicated the intended route would be further north and that SPEN should move the line north.	As above

	There was concern in some areas that the width of the preferred corridors made it difficult to envisage tower routes	See paragraph 9.2.43 under ***Level and amount of detail***
Consultation process	A number of people said they had not received information and had missed opportunities to attend exhibitions due to their limited number and locations. Some said the newsletter looked like advertising material.	See responses within section 9.3 ***Consultation process***
	The Parochial Church Council of Kirkandrews on Esk said it had not received any direct notification about the consultation and nor had Roucan Loch Crematorium.	As above
	Time allowed to assimilate a considerable amount of highly technical information and formulate a response was considered to be too short.	As above
Consultation materials	Some respondents described the information SPEN provided as good, while others suggested it was misleading due to a perception that it had focussed on the age of infrastructure rather than the need to increase demand.	See responses within section 9.4 ***Consultation materials***
	There were comments that online project documents, especially maps, were difficult to read on a normal home PC or laptop and, at 200 pages, were expensive to print. There was dissatisfaction that organisations considered "key" were charged for hard copies of the document.	As above See paragraph 9.2.36 under ***Approach to stakeholders***

	It was felt that the ability to engage meaningfully was hampered by unavailability of key documents such as the SER, a technical document in support of site G2 as a substation, underlying data in support of Appendix 4, and the statutory consultee responses to date.	See paragraphs 7.2.24 and 7.2.25 under ***Errors and omissions***
	There were requests for information on the impact of the proposal on ancillary distribution networks.	See paragraph 7.4.11 under section ***Landscape and amenity***
	There was some praise for the staff at exhibitions, however concern that local engagement at the exhibition in Newton Stewart was poor concerning the substation siting area NS5 near Challoch. Feeling that SPEN had not effectively communicated.	See paragraph 9.4.42 under ***Exhibitions***. This area is no longer affected. It does not form part of the KTR Project. In particular, there is no substation now proposed near Newton Stewart.

Appendix E: Summary of responses from elected representatives

Appendix E: Summary responses from elected representatives

MSP/MP	Issues & Questions Raised	DGSR Response
Jim Hume MSP	Concerns re: environmental impact of the scale and size of the proposal on parts of the countryside which are currently tower free.	SPEN carried out a strategic review of environmental, technical and economic considerations through the application of established step-by-step routeing principles to identify preferred corridors which meet the overarching routeing and siting objective for the project. However we want to know what people think of the methodology and the findings to date as, this could influence the next steps of the project.
	Concern that a large part of the proposal appears to not provide any direct benefit to local communities.	The principal benefit for local people will be the increased reliability of a network which, at up to 80 years old, is nearing the end of its operational life and needs to be replaced. On a wider level, society as a whole will benefit from the ability to connect new sources of low carbon generation to the electricity grid which will help the UK and Scotland achieve its carbon reduction targets.
	Concern that some members of the public were not aware of the proposal and so question the consultation process.	People told us they thought the leaflet may have been discarded as junk mail in error. Although only very few of the more than 14,000 mailed leaflets were returned as undelivered, we have noted people's feelings about the design of the original packaging. It was changed for the letter we sent people advising them of the extension to the consultation deadline and we will review it again for forthcoming rounds of consultation.
	Urge SPEN to take views on board and request information on how responses will be processed.	As outlined in section 1.3, SPEN attaches great importance to the effect that its work may have on local communities. Chapter 4 sets out how we gathered and analysed people's feedback which is presented in summary form in Chapters 6 to 9, together with our responses to the issues raised. Where feedback has influenced the project, this is explained in Chapter 11.
	Enclosed a copy of the submission from Galloway and Southern Ayrshire Biosphere Partnership Board.	The board's submission was also received as independent feedback and has been considered. See Appendix B

Claudia Beamish MSP	Reassured that project brought to her attention in early stages of consultation and recognises need to upgrade and improve infrastructure. Raises concerns size of towers and length of corridors and requests what assessments were carried out to conclude the project is the most efficient response.	Through the development of the KTR Project, we have considered a range of strategic options which have been filtered (balancing environmental, technical and economic criteria) into a smaller subset which was subject to a more detailed cost-benefit analysis (CBA). This has informed our project submission to Ofgem. In terms of the corridors, we engaged independent environmental consultants to carry out a routeing study and our *Routeing and Consultation Document* explains how we identified and appraised broad corridor options. The size of the towers we need is determined by the voltage we need in order to deliver the project.
	Concern over health and safety implications of towers near residential areas and queries what assessment has been carried out on the available research.	We follow the advice of independent experts and all our overhead lines comply with UK Government policy. The proposed replacement transmission lines will also comply with this policy, which is based upon 1998 guidelines published by the International Commission on Non-Ionising Radiation Protection (ICNIRP). This policy was reaffirmed in a Written Ministerial Statement in October 2009
Joan McAlpine MSP	Reports constituents' dismay at consultation process, including how it was communicated, lack of transparency over appraisal of strategic options and at being presented with a corridor determined before consultation began. Urges that constituents' concerns are addressed.	We have noted all the comments made by constituents and any constituent letters have been recorded, assessed, analysed and considered with feedback from members of the public as outlined in Chapter 4.
	Concern why the proposed route diverts so significantly from the current one. Comments that, from an amenity point of view it would seem "the lesser of two evils" to upgrade towers where they already exist in the landscape.	SPEN have carried out a strategic review of environmental, technical and economic considerations through the application of established step-by-step routeing principles to identify preferred corridors which meet the overarching routeing and siting objective for the project. Our approach to routeing has been to adopt a 'blank sheet' approach e.g. not solely reflecting the route of existing 132kV overhead lines. This approach ensures that all potential corridors are identified and appraised, while acknowledging that potential corridors may follow/include existing overhead lines in places. It is important to note that a number of the corridor options we identified for the project included the routes of existing lines. This is the case between Polquhanity to Kendoon and Glenlee, and Glenlee to Tongland. All corridor options in a given area were subject to environmental and technical appraisal against each other and the presence of the existing line was taken into account. The findings in each area are presented within the corridor

		appraisal tables in the Routeing and Consultation Document, and informed the selection of a preferred corridor.
	Concern over visual impact from the size, scale and siting of the network and the associated implications for tourism industries and cultural heritage, wildlife, the local environment and property values.	We understand that the most notable effect of an overhead line is visual, as a result of its scale relative to objects such as houses and trees, and aim to reduce intrusion as much as we can by careful routeing. In accordance with statutory duties imposed by the Electricity Act 1989, the routeing methodology seeks to preserve features of natural and cultural heritage interest as well as people who live, work and recreate in the area. We also appointed a consultant to help us with this task of quantifying the local economic and wider societal benefits as part of a cost-benefit analysis. This included assessing any impact on tourism and recreation, job creation and local expenditure on goods and services alongside many other important factors. Going forward, a more detailed assessment of these issues will be undertaken as part of the wider Environmental Impact Assessment (EIA).
	Seeks assurance that options such as undergrounding and other innovative technologies are fully and seriously explored and cost should not be the driving factor.	High voltage, high capacity overhead lines are the economic and reliable choice for the bulk transmission of electricity throughout the world. It is therefore our view that wherever practical, an overhead line approach is taken when planning and designing major electricity infrastructure projects such as this. However, we appreciate that there are specific circumstances in which an underground approach should be considered. If, through the routeing process, it is determined that an underground cable section is required then the approach is to minimise the length of underground cable necessary to overcome the constraint to routeing. This must be consistent with a balance between technical and economic viability, deliverability and environmental considerations. The criteria we use in deciding whether lines should be undergrounded can be found in our document Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment at www.spendgsr.co.uk.

	Seeks guarantees that evidence relating to the relationship between power lines and childhood cancer, leukaemia in particular is appropriately assessed and that constituents' concerns are addressed directly.	There has been a lot of research into whether electric and magnetic fields have any effect on health, and over £300m has been invested in investigating this issue around the world. Research still continues but the balance of scientific evidence to date suggests that EMFs do not cause disease. We have dedicated EMF resources to assist the public and to provide further information, including, if appropriate, home visits and measurement of fields.
	Concern that local benefits of the upgrade have not been made explicit and that SPEN has not made a strong case as to the need for the capacity upgrade.	One of the principal benefits for local people is the replacement of ageing infrastructure which, at up to 80 years old, is approaching the end of its life and the improved security of supply to the people in the area. The electrical transmission network by its nature, delivers benefits to a wide area, by providing secure electricity supplies to homes and businesses. The network facilitates the transfer of energy from multiple generation sources and across multiple routes. However, we are continually reviewing our detailed analysis of network capacity and system constraints, and developing our technical options against a number of possible generation scenarios. These generation scenarios, representing differing levels of generation growth, have been developed in order to fully 'stress test' the requirement for each option.
	Raises possibility of mitigation money should the project go ahead, to compensate individuals and communities.	There is no basis to compensate individuals financially as a result of the KTR Project proceeding. SPEN is under obligations both in terms of its Schedule 9 duties and in terms of the applicable EIA regulations to mitigate environmental effects. There would be a financial cost associated with this. However rather than a community benefit contribution, it is likely to be applied towards improvements to visual amenity through enhanced planting schemes or the promotion of green networks.
	Specific reference to potential mitigation monies available from Ofgem and requesting information whether it would apply in Scotland where legislation around national parks is different.	Ofgem has set aside a sum of money to develop measures for visual mitigation of existing infrastructure in National Parks, National Scenic Areas and Areas of Outstanding Natural Beauty (AONBs) in Scotland, England and Wales. The fund does not apply to new infrastructure, as environmental regulations are now in place to ensure electricity companies take account of environmental and visual impacts when planning new infrastructure.

	Urges SPEN consider its social obligations in light of the advent of community benefit schemes offered by wind farms and suggests a scheme to address the problem of fuel poverty might be appropriate.	The Scottish Power Group of companies (of which SPEN is a part) is actively engaged in tackling fuel poverty through participation in a range of government backed schemes such as the Scottish Power Energy People's Trust http://www.energypeopletrust.com
	Concern re the size and siting of substations, with specific concerns about noise.	The KTR Project will not require the construction of new substation sites. An extension to the existing site at Glenlee will be required. Potential noise impacts will be considered as part of the EIA process. Baseline noise data will be collected to establish current noise levels, and how these might be affected by our equipment. The exact locations for monitoring will be agreed with the council Environmental Health Officer, and potential noise from construction and operation will be assessed as part of the EIA
	Queries whether an enclosed substation design had been considered.	The KTR Project will involve the extension of the existing Air Insulated Switchgear (AIS) substation at Glenlee.
	Feels that a subsea cable should be built, eliminating the need for towers, and that, unless SPEN can make a clear and convincing case that the transmission upgrade is necessary for local residents/businesses, then calls for a subsea cable will continue to gather support.	Through the development of the project, we considered a wide range of strategic options in order to develop a proposal which would have addressed all of the project drivers shown above. These strategic options, which included 'do nothing' and 'do minimum' options, covered different network designs, technologies and voltage levels. Alternative technologies that have been assessed include subsea options. Each strategic option was assessed against the same environmental, technical and economic criteria. The development of the options considered the location of existing infrastructure, the contracted generation portfolio as a whole and the future needs of the transmission network. Subsea cabling is no longer relevant to the KTR Project which has a reduced scope to modernise the existing transmission network and provide some additional capacity to connect new generation.
	Requests SPEN clarify the position with regard to the UK Government's recent withdrawal of support for onshore wind, as well as any work done on projected generation capacity.	We have consulted directly with all those contracted to connect to our network since the policy announcements and continue to engage with them on regular basis. As yet we have not seen a significant change in our contracted position in response to the announcements. Energy policy changes are considered in the scenarios against which we are modelling our cost-benefit analysis to determine the appropriate capacity to meet the future generation position. There will always be uncertainty on the volume of generation that will connect in the future. However, we need to develop the project now to secure supplies to

		existing customers. We will continue to monitor and adapt as best we can to deliver the appropriate solution to meet the changing background generation picture. Regulatory pressure and stakeholder needs are enshrined in our licence obligations and ensure that we strive to achieve the optimum outcome.
	Concern over perceived risk of collisions, given the height of the towers and the frequency with which low-flying aircraft are present in several of the areas identified in the network proposals.	We have consulted with a wide range of stakeholders as part of the current consultation and this also includes the Ministry of Defence Safeguarding and National Air Traffic Services and will continue to do so as the project progresses.
	Expresses anxiety around the potential for noise and traffic disruption.	Distances between the overhead line/substation sites and individual properties and other sensitive receptors e.g. schools, will be maximised where possible through the routeing process. The subsequent tower siting process will also seek to maximise distances to residential properties and sensitive receptors and potential noise impacts will be considered as part of the EIA process. Baseline noise data will be collected along the overhead line route and at proposed substation locations In order to establish the existing noise environment. These locations will be agreed with the council Environmental Health Officer, and an assessment of construction and operational noise impacts will be undertaken as part of the EIA. If consented, the project would require submission of a detailed Traffic Management Plan (TMP) to the local roads authority. The role of the TMP would include managing traffic movements to ensure that we keep any inconvenience to the public to a minimum whilst maintaining a safe environment for the workforce and all other road users.
	Seeks specific guarantee that compulsory land acquisition will be avoided at all costs and that there will be no significant restrictions on land access or public rights of way.	Our intention is to work with landowners to secure voluntary land rights. Use of SPEN's compulsory powers would only be considered where no agreement can be reached. In such instances it would be for SPEN to prove that it is necessary or expedient for the plant and/or other apparatus to be sited on the land in question. SPEN's commitment to landowners can be found in our Grantor's Charter at http://www.spenergynetworks.co.uk/pages/wayleaves.asp

	Concern re the possible consequences for local biodiversity, specifically disruption to the migratory routes and feeding patterns of birdlife.	Care for the environment is extremely important to us and, as part of our routeing methodology, we identified areas protected nationally and internationally for their environmental value. We also identified other areas where effects could be felt, such as areas birds fly through to reach designated areas. In respect of pink-footed geese for example, the preferred corridor avoids many areas known to be frequented by feeding geese. However, their more dispersed and less habitual feeding areas will require information from baseline field surveys to identify any regions of relatively high flight activity between these areas and designated sites. This also applies to other species of conservation concern in the wider countryside. Where collision risk may lead to potential adverse effects on these populations, bird flight diverters provide an opportunity to mitigate these effects; hence, these issues will be addressed at the EIA stage. Red Kite communal winter roosts will be taken account of during the line routeing and substation siting stage and other species of high/moderate conservation concern will be considered during the alignment/EIA stage.
	Concern over loss of woodland with queries over re-planting and what happens to cleared timber.	Woodland, including ancient woodland, has been taken account of to date during the corridor and siting area identification stages and will continue to inform line route and substation site option identification and appraisal. Effects associated with the loss of woodland, re-planting and use of timber will be assessed as part of the EIA.
	Highlights that a number of constituents believe there is a conflict of interest in that Scottish Power operates some onshore wind projects likely to benefit from the increased grid capacity.	Scottish Power Generation, Scottish Power Energy Networks and ScottishPower Renewable Energy are all businesses wholly owned by ScottishPower Ltd. They are entirely separate from each other and have their own boards of directors who hold decision-making responsibility for operational business management; ensuring appropriate business separation safeguards are observed.
	Also requested a meeting.	Meetings held on 15/06/2015 and at SNP conference on 16/10/2015
Richard Arkless MP	Believes the upgrade is necessary to give D&G an energy infrastructure fit for the 21st century but more needs to be done to find a better solution.	Meetings held on 07/10/2015 and at the SNP conference on 16/10/2015

	Concerns over the route the proposed towers will take and requests it is re-considered. Queries why towers cannot follow existing line routes.	SPEN have carried out a strategic review of environmental, technical and economic considerations through the application of established step-by-step routeing principles to identify preferred corridors which meet the overarching routeing and siting objective for the project. Our approach to routeing has been to adopt a 'blank sheet' approach e.g. not solely reflecting the route of existing 132kV overhead lines. This approach ensures that all potential corridors are identified and appraised, while acknowledging that potential corridors may follow/include existing overhead lines in places. It is important to note that a number of the corridor options we identified for the project included the routes of existing lines. This is the case between Polquhanity to Kendoon and Glenlee, and Glenlee to Tongland. All corridor options in a given area were subject to environmental and technical appraisal against each other and the presence of the existing line was taken into account. The findings in each area are presented within the corridor appraisal tables in the *Routeing and Consultation Document*, and informed the selection of a preferred corridor.
	Feels it difficult for communities to understand why their landscape will be affected when there are clear alternatives including the potential of burying the cables required at land or sea.	Through the development of the project, we considered a wide range of strategic options in order to develop a proposal which would have addressed all of the project drivers shown above. These strategic options, which included 'do nothing' and 'do minimum' options, covered different network designs, technologies and voltage levels. Alternative technologies that have been assessed include subsea options. Each strategic option was assessed against the same environmental, technical and economic criteria. The development of the options has considered the location of existing infrastructure, the contracted generation portfolio as a whole and the future needs of the transmission network. Subsea cabling is no longer relevant to the KTR Project which has a reduced scope to modernise the existing transmission network and provide some additional capacity to connect new generation. High voltage, high capacity overhead lines are the economic and reliable choice for the bulk transmission of electricity throughout the world. It is therefore our view that wherever practical, an overhead line approach is taken when planning and designing major electricity infrastructure projects such as this. However, we appreciate that there are specific circumstances in which an underground approach should be considered. If, through the routeing process, it is determined

		that an underground cable section is required then the approach is to minimise the length of underground cable necessary to overcome the constraint to routeing. This must be consistent with a balance between technical and economic viability, deliverability and environmental considerations. The criteria we use in deciding whether lines should be undergrounded can be found in our document *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment* at www.spendgsr.co.uk.
	Represents constituents' concerns over the need for the upgrade and the proposed route. Also forwarded several letters from constituents	All constituent letters have been recorded, assessed, analysed and considered with feedback from members of the public as outlined in Chapter 4, section 4.2.
Adam Ingram MSP	Forwarded concerns of constituent.	All constituent letters have been recorded, assessed, analysed and considered with feedback from members of the public as outlined in Chapter 4, section 4.2.
Chic Brodie MSP	Forwarded concerns of constituents and requested phone call.	Telephone conversation on 28/08/2015. All constituent letters have been recorded, assessed, analysed and considered with feedback from members of the public as outlined in Chapter 4, section 4.2.
Dr Elaine Murray MSP	Forwarded concerns from several constituents.	Meetings held with MSP on 04/06/2015 and 05/10/2015 All constituent letters have been recorded, assessed, analysed and considered with feedback from members of the public as outlined in Chapter 4, section 4.2.
Dr Aileen McLeod MSP	Requested a meeting	Meeting held with MSP on 02/10/2015
Graeme Pearson MSP	Reported summarised concerns from several constituents regarding "antagonism" against towers and support for undergrounding. Meeting requested	Meeting held with MSP on 29/10/2015
Rt Hon Alex Fergusson MSP	Requested an extension to the original July 24 deadline.	Meeting held with MSP on 30/07/2015

Rory Stewart MP	Requested a meeting	Meeting held with MP on 21/10/2015
Rt Hon David Mundell MP	Objects to the current plans.	Meeting held with MP on 21/10/2015
	Reports concerns of constituents over the detrimental impact of a new high voltage overhead energy line upon a "completely unspoilt" part of Dumfries and Galloway's countryside.	SPEN have carried out a strategic review of environmental, technical and economic considerations through the application of established step-by-step routeing principles to identify preferred corridors which meet the overarching routeing and siting objective for the project. The existing towers are approaching the end of their life and need to be replaced, plus, in areas where capacity needs to be increased, they're not big enough to carry higher voltage wires.
	Concern that towers 50 per cent bigger than what currently exist would affect the landscape, devalue homes and affect tourism which supports local employment.	This statement refers to the proposed towers for the original DGSR Project, that is the 400kV overhead line proposal between Auchencrosh and Harker which is no longer being progressed. The towers for the KTR Project will be 132kV with an increase of an average height from 25m (existing) to 30m (proposed). Nonetheless, we understand that the most notable effect of an overhead line is visual, as a result of its scale relative to objects such as houses and trees, and aim to reduce intrusion as much as we can by careful routeing. In accordance with statutory duties imposed by the Electricity Act 1989, the routeing methodology seeks to preserve features of natural and cultural heritage interest as well as people who live, work and recreate in the area. We have appointed a consultant to help us with the task of quantifying the local economic and wider societal benefits as part of a cost-benefit analysis. This will include assessing any impact on tourism and recreation, job creation and local expenditure on goods and services alongside many other important factors.

	Urges consideration of alternatives of undergrounding or putting a cable along the Solway Firth.	Through the development of the project, we considered a wide range of strategic options in order to develop a proposal which would have addressed all of the project drivers shown above. These strategic options, which included 'do nothing' and 'do minimum' options, covered different network designs, technologies and voltage levels. Alternative technologies that have been assessed include subsea options. Each strategic option was assessed against the same environmental, technical and economic criteria. The development of the options has considered the location of existing infrastructure, the contracted generation portfolio as a whole and the future needs of the transmission network. Subsea cabling is no longer relevant to the KTR Project which has a reduced scope to modernise the existing transmission network and provide some additional capacity to connect new generation. High voltage, high capacity overhead lines are the economic and reliable choice for the bulk transmission of electricity throughout the world. It is therefore our view that wherever practical, an overhead line approach is taken when planning and designing major electricity infrastructure projects such as this. However, we appreciate that there are specific circumstances in which an underground approach should be considered. If, through the routeing process, it is determined that an underground cable section is required then the approach is to minimise the length of underground cable necessary to overcome the constraint to routeing. This must be consistent with a balance between technical and economic viability, deliverability and environmental considerations. The criteria we use in deciding whether lines should be undergrounded can be found in our document *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment* at www.spendgsr.co.uk.
	Queries if and how the project is affected by recent changes by the UK Government to the Renewables Obligation and onshore wind farm subsidy.	We have consulted directly with all those contracted to connect to our network since the policy announcements and continue to engage with them on regular basis. As yet we have not seen a significant change in our contracted position in response to the announcements. Energy policy changes are considered in the scenarios against which we are modelling our cost-benefit analysis to determine the appropriate capacity to meet the future generation position. There will always be uncertainty on the volume of generation that will connect in the future. However, we need to develop the Project now to secure supplies to existing customers. We will continue to monitor and adapt as best we can to deliver the appropriate solution to meet the changing background generation picture. Regulatory pressure and stakeholder needs are enshrined in our licence obligations and ensure that we strive to achieve the optimum outcome.

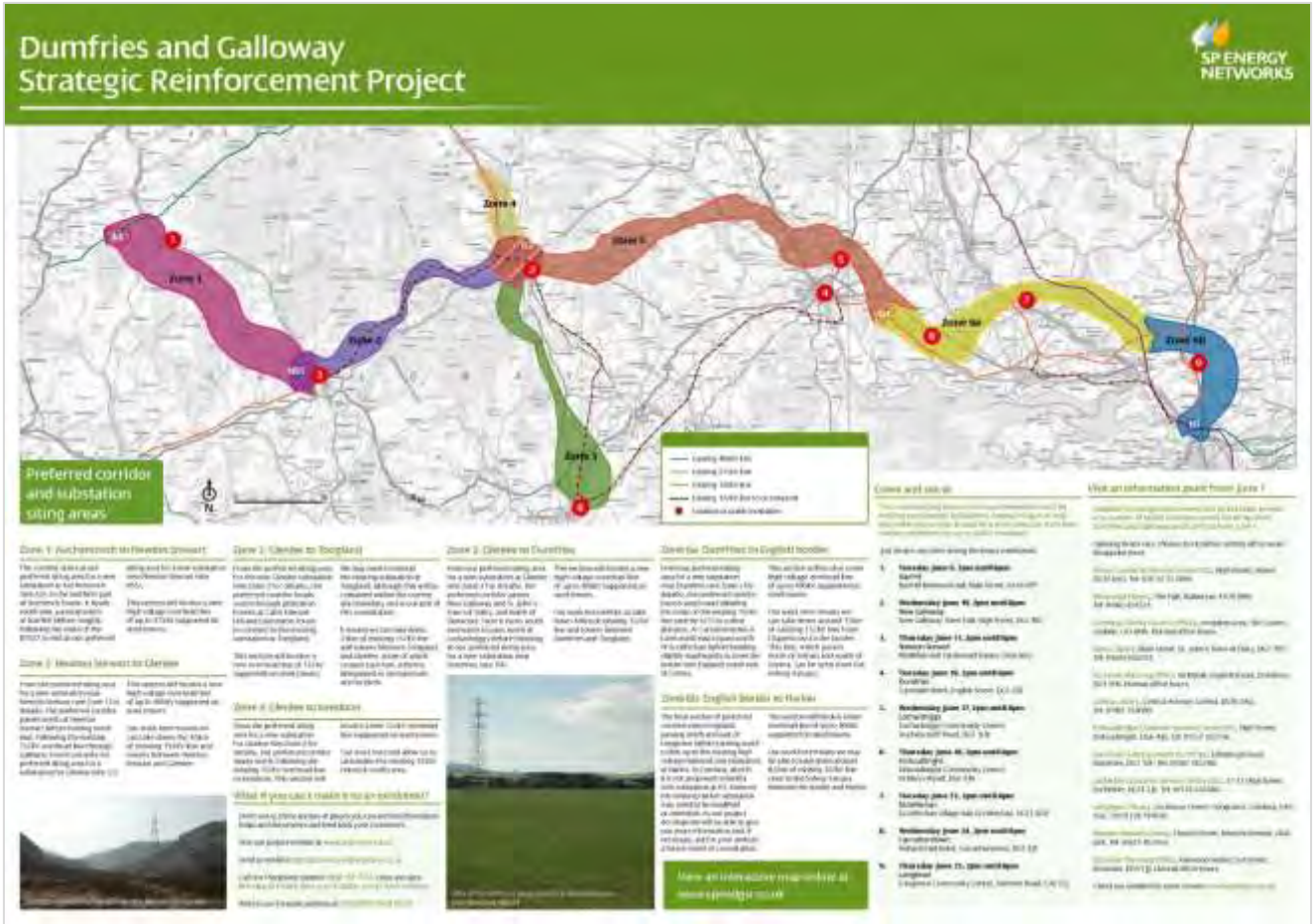
	Urges SPEN to consider alternatives to the current proposal.	We are continually reviewing our detailed analysis of network capacity and system constraints, and developing our technical options against a number of possible generation scenarios. These generation scenarios, representing differing levels of generation growth, have been developed in order to fully 'stress test' the requirement for each option.
Scottish Conservatives and Unionist Party Signatories: Ian Duncan MEP, Rt Hon David Mundell MP, Rt Hon Alex Fergusson MSP, Cllr Dennis Male, Cllr Finlay Carson, Cllr Gail McGregor, Cllr Gill Dykes, Cllr Graham Nicol, Cllr Ian Blake, Cllr Ivor Hyslop, Cllr Patsy Gilroy	Strongly object to the project.	Noted.
	Sympathise with the need to replace the existing infrastructure given its age and appreciate the requirement to 'export' the increasing amount of electricity that is being generated in area.	Noted
	Believe consulting over the summer not conducive to gathering breadth and depth of public opinion, despite the extension to the deadline.	The public information events had been specifically timed to fall before the school holiday period whilst allowing an appropriate period of time after the last event for people to respond. However after receiving several requests we extended the deadline for feedback by a further five weeks to August 31.
	Believe least disruptive is to erect a new line in close proximity to the existing line and thereafter remove the existing infrastructure.	SPEN have carried out a strategic review of environmental, technical and economic considerations through the application of established step-by-step routeing principles to identify the preferred corridor which meet the overarching routeing and siting objective for the project. Our approach to routeing has been to adopt a 'blank sheet' approach e.g. not solely reflecting the route of existing 132kV overhead lines. This approach ensures that all potential corridors are identified and appraised, while acknowledging that potential corridors may follow/include existing overhead lines in places. It is important to note that a number of the corridor options we identified for the project included the routes of existing lines. This is the case between Polquhanity to Kendoon and Glenlee, and Glenlee to Tongland. All corridor options in a given area were subject to environmental and technical appraisal against each other and the presence of the existing line was taken into account. The findings in each area are presented within the corridor appraisal tables in the *Routeing and Consultation Document*, and informed the selection of a preferred corridor.

	Sub-sea cable along the Solway worthy of consideration and could link with the subsea cable network already in existence.	Through the development of the project, we considered a wide range of strategic options in order to develop a proposal which would have addressed all of the project drivers shown above. These strategic options, which included 'do nothing' and 'do minimum' options, covered different network designs, technologies and voltage levels. Alternative technologies that have been assessed include subsea options. Each strategic option was assessed against the same environmental, technical and economic criteria. The development of the options has considered the location of existing infrastructure, the contracted generation portfolio as a whole and the future needs of the transmission network. Subsea cabling is no longer relevant to the KTR Project which has a reduced scope to modernise the existing transmission network and provide some additional capacity to connect new generation.
	Point out that possibility of undergrounding is not mentioned by SPEN.	High voltage, high capacity overhead lines are the economic and reliable choice for the bulk transmission of electricity throughout the world. It is therefore our view that wherever practical, an overhead line approach is taken when planning and designing major electricity infrastructure projects such as this. However, we appreciate that there are specific circumstances in which an underground approach should be considered. If, through the routeing process, it is determined that an underground cable section is required then the approach is to minimise the length of underground cable necessary to overcome the constraint to routeing. This must be consistent with a balance between technical and economic viability, deliverability and environmental considerations. The criteria we use in deciding whether lines should be undergrounded can be found in our document *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment* at www.spendgsr.co.uk.
	Concern re visual impact of many kilometres of large towers where none currently exist.	SPEN have undertaken a strategic review of environmental, technical and economic considerations through the application of established step-by-step routeing principles to identify the preferred corridors for the project which meet the overarching routeing and siting objective for the project.
	Highlighted one unspecified major capital investment, and its potential to bring high level rural employment, which would not take place if the preferred corridor is rigidly adhered to.	We are in contact with a number of interests who have provided information about their development plans and will continue to engage with them as the project develops. We have also appointed a consultant to help us with this task of quantifying the local economic and wider societal benefits as part of a cost-benefit analysis. This will include assessing any impact on tourism and recreation, job creation and local expenditure on goods and services alongside many other important factors.

	Request suspension of proposed preferred corridor and discussions with all interested parties and stakeholders.	The contracted generation position is under constant review as the project is being developed and we will set out an incremental approach where possible. However, we are unable to postpone the decision to start developing the project as our role is to ensure that assets with high priority for replacement are dealt with before performance of the network deteriorates.
Cllr Val Tarbitt (CCC)	Zone 6a: Need to take into account two large wind farms which have been granted planning permission.	Zone 6a does not form part of the KTR Project and is therefore no longer affected.
	Narrowness of roads needs to be considered.	The suitability of the road network for construction traffic will be considered prior to the submission of any applications for consent. If consented, the project would require submission of a detailed Traffic Management Plan (TMP) to the local roads authority and part of this would be to undertake condition assessments of the local road network to be utilised by construction traffic and the management of traffic and the standard of reinstatement post-construction.
	Compensation for road damage should be discussed.	If the project gets consent, it is expected that it would include a condition requiring SPEN to enter into an agreement under the Roads (Scotland) Act 1984 to address wear and tear to the road network during the construction period. The agreement would provide for surveys of the condition of the roads and an obligation to undertake reinstatement post-construction.

Appendix F: Project leaflet

http://www.spenergynetworks.co.uk/userfiles/file/20150513-DGSR-leaflet-FINAL.pdf



Appendix G: Feedback form

SP ENERGY NETWORKS

Feedback form

Dumfries and Galloway Strategic Reinforcement Project

Consultation on preferred corridor and preferred siting areas for substations

The last day for submitting feedback is July 24, 2015

SP Energy Networks owns and manages the electricity transmission system across central and southern Scotland. We are part of the ScottishPower Group.

We need to upgrade some of the overhead lines in Dumfries and Galloway because they are near the end of their life. Plus, they don't have enough capacity to meet current and future needs.

We want to do this by building a new high voltage overhead line supported on steel towers from Auchencrosh, in South Ayrshire, through Dumfries and Galloway, to Harker, just north of Carlisle in Cumbria. We are inviting you to take part in our first public consultation on the project. We want to know what you think about our preferred corridor, and our preferred siting areas for four new substations. More information about the project and the consultation process can be found in the project leaflet and on the project website.

If you want to complete the form online, you can do so right up until midnight on July 24 2015. You can find it at www.spendgsr.co.uk.

If you prefer, you can send us your completed form by post for free. Just pop it in an envelope and write FREEPOST SPEN DGSR in a single line. Nothing else is needed. Please make sure your letter arrives by our deadline of July 24 2015, as comments received after this date may not be considered. You should allow up to a week for your letter to arrive at our office.

We will also accept feedback by letter, email and phone.
FREEPHONE: 0800 157 7353
Email: dgsr@communityrelations.co.uk
Postal address: FREEPOST SPEN DGSR

ABOUT YOU

Title* (Mr . Ms . Mrs): .....
First name*: .....
Surname*: .....
Are you responding on behalf of an organisation? Yes ☐ No ☐

If yes, which one:

Address: .....
Postcode: .....
Telephone: .....
Email *(if you would like to receive updates when there is project news)*: .....
Age range: 18 and under ☐ 19-34 ☐ 35-50 ☐ 51-65 ☐ over 65 ☐
Did you attend one of our exhibitions? Yes ☐ No ☐

Keeping your details safe

SP Energy Networks is committed to respecting your privacy and will comply with all applicable data protection and privacy laws. We're consulting you to get your views on the Dumfries and Galloway Strategic Reinforcement Project, so we may need to share your information with certain other bodies for the purposes of the consultation and for creating reports. These are: other ScottishPower Group companies; third party service providers, contractors or advisors who provide services to us; the Planning Inspectorate; the Scottish Government; and relevant local planning authorities.

HAVE YOUR SAY

This is SP Energy Networks' first round of public consultation about this project. It concerns our preferred corridor and our preferred siting areas for new substations.

The corridor and siting areas are broad areas of land. We don't yet know exactly where the new infrastructure will go within these areas. There will be more opportunities to comment on the project as it progresses and as more detail becomes available in future rounds of public consultation.

Ultimately, Scottish Ministers and the Secretary of State for Energy and Climate Change will decide whether to give our project development consent, so we're at the start of a long process.

In this consultation, we'd like to know what you think about:

- Overall comments on the project
- Comments on the preferred corridor and preferred substation siting areas
- What you think about the potential removal of existing overhead lines in some areas
- Any other factors you would like us to consider, for instance your views on other corridors or siting areas we considered
- We would particularly like your views on your local area, for example, areas you use for recreation, local environmental features you would like us to consider, and any plans you may have to build anything in our preferred corridor

COMPLETING THE FORM

The form is in several sections to make it easier. You only need to answer the questions you want to answer, so fill in as much or as little as you like.

Sections in this form

A. The project in general, including the removal of overhead line
B. Zone 1: Auchencrosh to Newton Stewart
C. Zone 2: Newton Stewart to Glenlee
D. Zone 3: Glenlee to Tongland
E. Zone 4: Glenlee to Kendoon
F. Zone 5: Glenlee to Dumfries
G. Zone 6a: Dumfries to the English border
H. Zone 6b: English border to Harker
I. Substation siting areas
J. Your views about the consultation process
K. Other comments, including any about the other corridors or substation siting areas we considered

Please try to contain your answers within the boxes provided. However, if you feel you need more space, feel free to send us additional sheets. It would help us if you indicate within the box/es where you have continued your answer on a separate sheet, and that you mark the relevant question number/s on the sheet itself. Thank you.

A. Your views on the project in general, including the removal of overhead line

Q1. Do you have any general comments on the Dumfries and Galloway Strategic Reinforcement Project? This includes the way we identified and assessed the various possible corridors and substation siting areas as well as how we decided on our preferred options. You can refer to the Routeing and Consultation Document on the project website for more information about the reasoning we used.

Q2. As part of the project there is potential to remove up to 130km of existing overhead lines and towers. Do you have any comments about the removal of these lines? Please refer to the following key if you are commenting on specific sections of line to be removed.

1. 30km of existing 132kV line and towers between Newton Stewart and Glenlee (see Zone 2)
2. 33km of existing 132kV line and towers between Tongland and Glenlee (see Zone 3)
3. 44km of existing 132kV line and towers between Tongland and Dumfries (see Zone 5)
4. 15km of existing 132kV line between Chapelcross and the English border (see Zone 6a)
5. 8.5km section of 132kV line from the English border to Harker (see Zone 6b)

B. Zone 1: Auchencrosh to Newton Stewart

Q3. Do you have any comments about the preferred corridor between our preferred substation siting area near Auchencrosh and our preferred substation siting area near Newton Stewart?

C. Zone 2: Newton Stewart to Glenlee

Q4. Do you have any comments about the preferred corridor between our preferred substation siting area near Newton Stewart and our preferred substation siting area near Glenlee?

D. Zone 3: Glenlee to Tongland

Q5. Do you have any comments about the preferred corridor between our preferred substation siting area near Glenlee and Tongland?

E. Zone 4: Glenlee to Kendoon

Q6. Do you have any comments about the preferred corridor between our preferred substation siting area near Glenlee and Kendoon?

F. Zone 5: Glenlee to Dumfries

Q7. Do you have any comments about the preferred corridor between our preferred substation siting area near Glenlee and our preferred substation siting area near Dumfries?

G. Zone 6a: Dumfries to the English border

Q8. Do you have any comments about the preferred corridor between our preferred substation siting area at Dumfries and the English border?

H. Zone 6b: English border to Harker

Q9. Do you have any comments about the preferred corridor between the English border and the existing substation at Harker?

I. The substation siting areas

Q10. We need to build four new substations. Do you have any comments about any of our preferred siting areas for any of the new substations? Please refer to the following key if you are commenting on specific substation siting areas.

1. Auchencrosh (preferred siting area A3)
2. Newton Stewart (preferred siting area NS5)
3. Glenlee (preferred siting area G2)
4. Dumfries (preferred siting area D4)

J. About the consultation

Q11. How did you find out about the project and the consultation?

- ☐ Advert
- ☐ Media
- ☐ Letter
- ☐ Leaflet
- ☐ Poster
- ☐ Website
- ☐ Word of mouth
- ☐ Social media
- ☐ Other, please specify: .....

Q12. How did you find the quantity and detail of information provided?

Q13. Is there any way we could improve our public consultation process for next time?

K. Any other comments

Q14. Do you have any other comments which are not covered in the rest of this form? Use this section to comment on any of the other corridors or siting areas we considered. Please continue on a separate sheet if you do not have enough space.

Thank you
Your views are essential to making this project a success.
Please return the form to us by no later than **July 24 2015**.

Appendix H: Scottish Power Transmission: Schedule 9 Statement

Schedule 9 Statement

SP TRANSMISSION LIMITED

Statement on Preservation of Amenity in accordance with Schedule 9 of the Electricity Act 1989

Statement on Preservation of Amenity & Fisheries in Scotland in Accordance with Schedule 9 of the Electricity Act 1989

1 Introduction

SP Transmission Limited ("SP Transmission") has a duty under Schedule 9 of the Electricity Act 1989 ("the Act") to have regard to the preservation of amenity.

This requires the relevant licence holder, when formulating proposals relating to the construction or extension of electric lines or the carrying out of other works in connection with the transmission or supply of electricity, to take account of the effects the proposals would have on the natural beauty of the countryside, on any flora, fauna, buildings or objects of historical interest and sites and structures of archaeological interest. It is also required to take reasonable actions to mitigate the effects of its proposals on amenity.

This Statement sets out how SP Transmission will carry out these duties in developing and maintaining its network.

2 Background

SP Transmission Limited is a wholly owned subsidiary of Scottish Power UK plc and holds an electricity transmission licence for Central and Southern Scotland. Its transmission network includes around 4000 circuit kilometres, both overhead and underground, and is operated at voltages of 132 kV and above.

Its authorised area include sites of national and international nature conservation, and many protected historic and archaeological sites and buildings, as well as dense housing and some heavily industrialised areas, particularly bordering on the Firth of Forth and the River Clyde.

SP Transmission has a statutory duty to develop and maintain an efficient, co-ordinated and economical system of electricity transmission. It needs to take this and other statutory duties into account, including those relating to preservation of amenity, when developing and carrying out investment projects.

This statement deals only with those environmental obligations falling under Schedule 9 of the Act. SP Transmission has a number of other environmental requirements and has a range of policies and procedures to meet these that are not covered here. Additional information on the environmental performance of the businesses in the ScottishPower group is reported annually within its corporate environmental report.

3 Statutory Requirements

The Act says that a licence holder, when formulating 'relevant proposals':

> "(a) shall have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geographical or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and
>
> (b) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or any such flora, fauna, features, sites, buildings or objects." (Schedule 9, 1(1))

'Relevant proposals' mean any proposals:

> "… (b) for the installation (whether above or below ground) of an electric line; or
>
> (c) for the execution of any other works for or in connection with the transmission or supply of electricity." (Schedule 9, 1(3))

In addition, in respect of Scotland, the Act prescribes that:

> "… A licence holder… shall avoid, so far as is possible, causing injury to fisheries or to the stock of fish in any waters." (Schedule 9, 3(3))

SP Transmission's guidelines for meeting its Schedule 9 obligations are set out overleaf.

SP TRANSMISSION'S SCHEDULE 9 GUIDELINES

Where any of our operations or any proposed developments or projects comprise a "relevant proposal" we will observe the following guidelines:

1. Established Need

We will seek to construct new lines or substations only where the existing infrastructure cannot be upgraded to meet security of supply requirements, or where an increase in demand for electricity transportation capacity is foreseen which cannot be satisfied by other means or where new connections to customers are required.

2. Designated Areas for Amenity

We will pay due regard to the need to preserve and maintain amenity, particularly within the areas of the greatest landscape, wildlife or cultural amenity, such as National Parks, National Scenic Areas, Sites of Special Scientific Interest, Scheduled Ancient Monuments and other national or international designated areas.

For new transmission infrastructure we will investigate the possibility of alternative routes or sites outwith the designated area. For existing networks and where there is a requirement for infrastructure inside the designated area we will seek to minimise the impact of its presence through the sensitive routing and siting of structures. In such cases we will consult with those groups most likely to be affected at an early stage.

3. Seek to Minimise the Impact of New Infrastructure

We will seek to minimise the effects of new transmission infrastructure at or near both designated sites and also other sites valued for their general amenity, such as areas of archaeological interest, battlefields, local nature reserves, playing fields and water bodies. We will take into account the significance of sites valued for their amenity through consultation with statutory bodies and local authorities.

4. Mitigate the Adverse Effects of Works

Where works are likely to have an adverse effect on amenity, we will carry out our activities in such a way as to reduce the impact of these activities to the practicable minimum.

Where planned works would have a high impact on amenity, we will consult with statutory bodies, local authorities and relevant landowners to help us identify,assess and carry out measures to mitigate the impact so far as is reasonably practicable.

5. Environmental Assessments

We will carry out environmental assessments in accordance with relevant legislation prior to developing proposals for new lines or plant.

6. Protection of Fisheries

In the preparation of plans and programmes we will seek to avoid, so far as is possible, causing injury to fisheries or to the stock of fish in any waters within our licensed area.

7. Training and Awareness

We will promote environmental awareness amongst staff through appropriate training and dissemination of information. We will also make contractors aware of the relevant parts of this statement, and take steps to audit their compliance with it

8. Review of the Schedule 9 statement

We intend to review our Schedule 9 statement at least every 5 years.

Appendix I: Statutory Stakeholder Liaison Group (SSLG) Terms of Reference

Statutory Stakeholder Liaison Group – Terms of Reference

The Statutory Stakeholder Liaison Group (SSLG) was set up in 2014 and is made up of all of the project's statutory stakeholders from both Scotland and England.

The group will provide a forum for considering the planning, environmental, cultural and natural heritage issues that will arise from the proposal to construct a new 275kV transmission line from Auchencrosh to Harker.

Decisions on these matters will ultimately be a matter for Ministers. The Group's activities will be to ensure that there will be an open and constructive approach to identifying, reporting and considering issues that will have an impact on that decision. The Group will provide a forum for addressing cross-cutting issues and in developing good information flows that will contribute to the prevention or minimisation of delays in considering issues.

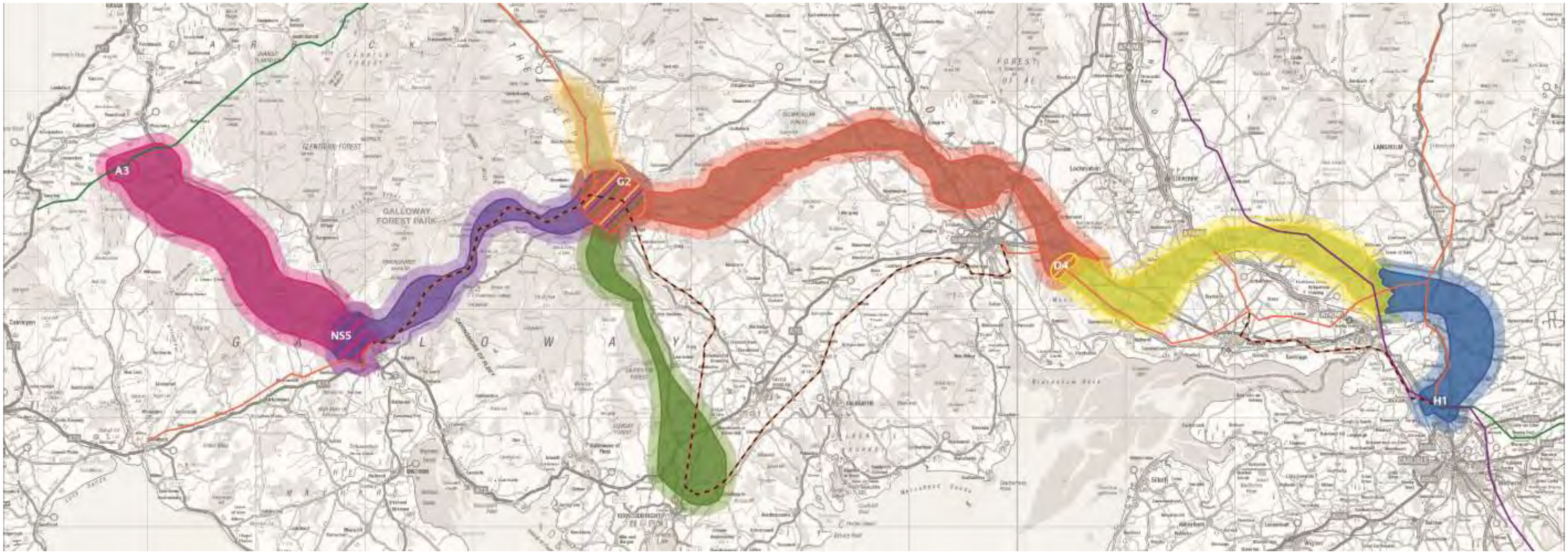
Members:

- Scottish Government Energy Consents and Deployment Unit
- South Ayrshire Council
- Dumfries and Galloway Council
- Cumbria County Council
- Carlisle City Council
- SEPA
- Environment Agency
- Historic Scotland
- Historic England
- Scottish Natural Heritage
- Natural England

Note: It is anticipated that other stakeholders may be invited to attend, at certain times, as the scheme and consultation progresses.

Appendix J: Consultation zones

Consultation zones, including 1km boundaries



Key

- Zone 1
- Zone 2
- Zone 3
- Zone 4
- Zone 5
- Zone 6a
- Zone 6b

Appendix K: Dunscore event poster

SP ENERGY NETWORKS

Dumfries & Galloway

Strategic Reinforcement Project

Public Exhibition

at

Glenriddell Hall
Dunscore

Tuesday July 14, 2015

2pm until 8pm

Appendix L: Letters announcing the Dunscore exhibition

Contact: 0800 157 7353
Email:dgsr@communityrelations.co.uk

02/07/2015

Dear sir or madam,

Public consultation exhibition in Dunscore on Tuesday July 14, 2015

I'm writing to let you know that SP Energy Networks is holding a public exhibition in Dunscore later this month and we would like to see you there.

As you may know, we are currently consulting the public on a project for a new overhead high voltage electricity line which will run from Auchencrosh in South Ayrshire, through Dumfries and Galloway, to Harker, near Carlisle, in Cumbria. You should recently have received a copy of our project leaflet in the post, which explains the project, and why it's needed, in full.

The project is at a very early stage and we are asking people for their views on our preferred corridor, which passes north of Dunscore. This is a broad swathe of land within which a new overhead electricity line could be built. We do not have a detailed route in mind for the line yet. This is why we are consulting the public. Your views are important to help us develop it.

We have already carried out nine public exhibitions along the length of the corridor. At one of these, people from Dunscore expressed a wish for a similar event more convenient to their village, which we are very happy to accommodate.

The exhibition will be held between 2pm and 8pm on Tuesday July 14 at the Glenriddell Hall, in Church Crescent.

Members of the project team will be on hand throughout the afternoon and evening to explain our plans and show detailed maps of the corridor, which passes north of Dunscore. We would be delighted if you could attend.

For more information about our project please visit our website at www.spendgsr.co.uk where you can find lots of information about why we need it and an interactive map showing the corridor and preferred sites for our new substations at Auchencrosh, Newton Stewart, Glenlee and Dumfries. There are also copies of key project documents for you to download, and an online feedback form for you to complete.

All the project documents are available to view at public information points such as Lochthorn Library, Dalry Library and at Dumfries planning offices in English Street. You can also see them at our exhibition.

If you have any questions please contact the community relations team on Freephone 0800 157 7353, by email at dgsr@communityrelations.co.uk or by post to FREEPOST SPEN DGSR (no stamp required).

The consultation ends at midnight on July 24.

Yours faithfully,

Community Relations
Dumfries & Galloway Strategic Reinforcement

Appendix M: Exhibition banners

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

Powering your future

A high voltage overhead line similar to the one needed in Dumfries and Galloway

We all expect electricity to be available at our fingertips at the flick of a switch 24 hours a day.

In southern and central Scotland the job of making sure that happens belongs to SP Energy Networks. In fact we have a statutory duty to do it.

Our transmission licence requires that we make sure people's supplies are secure and that our transmission system has the capacity to connect new sources of generation when they are developed.

In Dumfries and Galloway, and parts of South Ayrshire, almost 83,000 people rely on our 132kV (132,000 volt) electricity transmission system which is nearing the end of its life.

We've been working with key stakeholders to work out the best way to modernise it and we need the help of local people to make sure we get it right. We'll be consulting people at regular intervals as we develop and refine our ideas.

Find out more at **www.spendgsr.co.uk**

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

Why do we need a new overhead line?

This is what the area's existing electricity transmission system looks like.

A like-for-like replacement of what's there already would not meet society's current and future needs.

Here's why:

1. The existing system is old and needs to be replaced.

Dumfries and Galloway's electricity transmission system dates back to the 1930s. Although it's served communities well, it's near the end of its life. It needs to be replaced to make sure supplies to local homes and businesses are secure for decades to come.

2. It doesn't have the capacity we need to transmit electricity.

At just 132kV, the existing system is operating at full capacity. This part of Scotland is rich in energy from renewable sources. The lack of capacity will soon start to hamper our ability to transmit electricity from where it is generated to where it is needed.

3. We need to improve links with Ireland and the wider UK transmission system.

Electricity is transmitted between Auchencrosh and Northern Ireland via a subsea cable. At the moment our system is too small to let this cable link reach its full potential.

Find out more at **www.spendgsr.co.uk**

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

Our proposal

A section of existing overhead line between Newton Stewart and Glenlee. This one will be removed.

Connecting Auchencrosh with the UK-wide high voltage transmission system at Harker, near Carlisle, will make the system more resilient and give it the capacity to transmit electricity to other parts of Scotland plus Ireland and England too.

This means building a new high voltage transmission system of up to 400kV and four new substations.

A high voltage tower

The high voltage substation at Harker

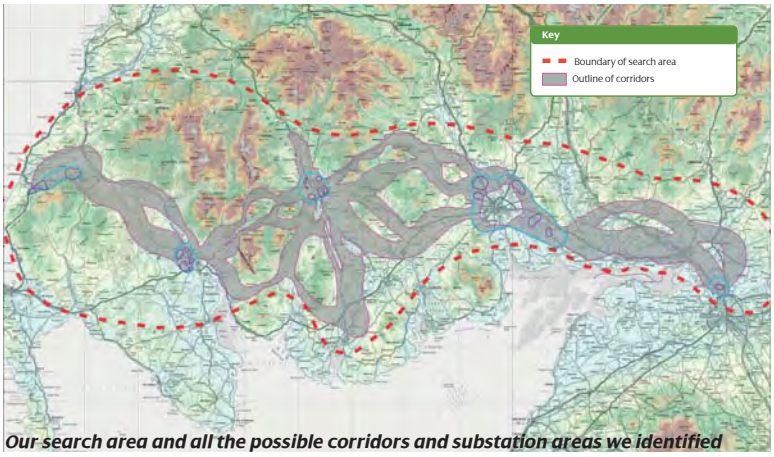
The good news is that about 130km (or 81 miles) of existing overhead line and steel towers can be removed as a result. Some of these are in or near environmentally sensitive areas

Find out more at **www.spendgsr.co.uk**

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

Identifying the preferred corridor and substation siting areas



Our search area and all the possible corridors and substation areas we identified

We used an environmentally-led method to identify a number of corridor options in a wide study area within which the new overhead line and substations could be built.

You can see them all on this map.

We then analysed each option against a number of environmental and technical criteria to identify the ones which we think are best. These criteria included:

- visual amenity including recreation and tourism;
- landscape character;
- ecology including birds;
- hydrology and flood risk;
- cultural heritage;
- the way land is used, including agriculture and forestry.

We think our preferred corridors and substation siting areas give the best balance between the environmental conditions and the project's technical needs to let us minimise the impact on the area's natural and built heritage as much as we can. The project will ultimately be funded by electricity bill payers, so it needs to be value-for-money too.

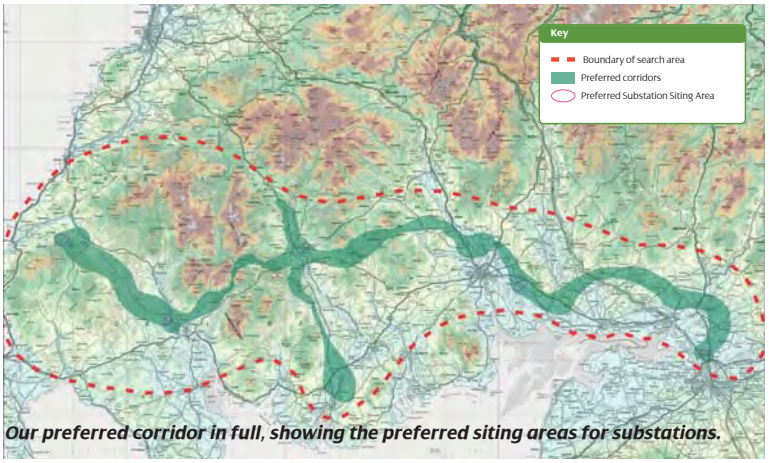
Tell us what you think at **www.spendgsr.co.uk**

Don't forget the consultation ends at midnight on **July 24, 2015**.

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

What we are proposing



Our preferred corridor in full, showing the preferred siting areas for substations.

Our preferred corridor stretches approximately 175km (or 109 miles) from Auchencrosh, in South Ayrshire, through Dumfries and Galloway, to Harker, in Cumbria. This includes two 132kV sections north to Kendoon and south to Tongland.

We will also need to build four new substations near Auchencrosh, Newton Stewart, Glenlee and Dumfries.

You can see our preferred corridor on this map, together with our preferred siting areas for the new substations. These areas are not the actual route or sites of the proposed new infrastructure, but just the area within which it could be built.

To make consultation easier we have divided the corridor into a number of zones, each starting and ending at an existing or proposed substation. You can see them in more detail on the other banners.

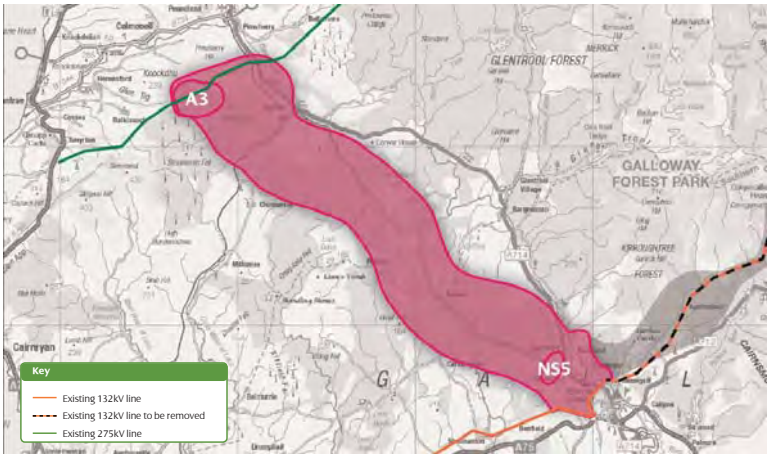
Tell us what you think at **www.spendgsr.co.uk**

Don't forget the consultation ends at midnight on **July 24, 2015**.

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

Zone 1: Auchencrosh to Newton Stewart



The corridor starts at our preferred siting area for a new substation at Auchencrosh (site A3), in the northern part of Arecleoch Forest. It heads south east, passing south of Barrhill, before roughly following the route of the B7027 to end at our preferred siting area for a new substation near Newton Stewart (site NS5).

Auchencrosh is where a subsea cable comes ashore allowing electricity to flow between Scotland and Northern Ireland.

This section will involve a new high voltage overhead line of up to 275kV supported on steel towers.

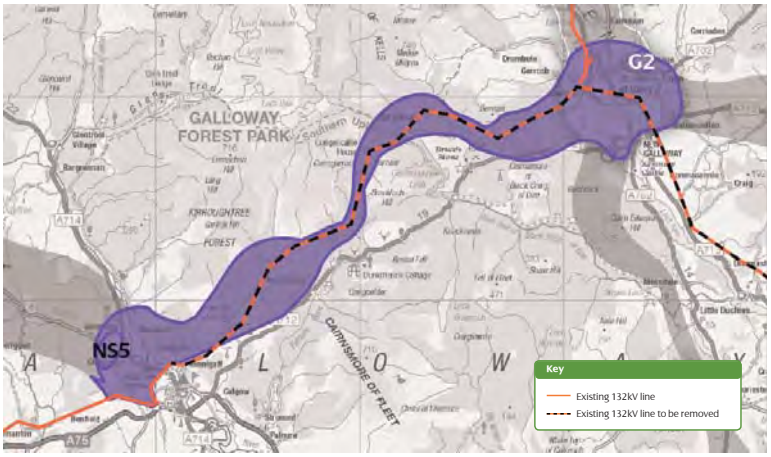
Tell us what you think at **www.spendgsr.co.uk**

Don't forget the consultation ends at midnight on **July 24, 2015**.

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

Zone 2: Newton Stewart to Glenlee



From the preferred siting area for a new substation near Newton Stewart (NS5), the preferred corridor passes to the north of Newton Stewart before turning north east, following the existing 132kV overhead line through the Galloway Forest towards our preferred siting area for a substation for Glenlee (site G2).

Glenlee is the site of a hydro-electric power station, which is one of the existing Galloway Hydro schemes.

This section will involve a new high voltage overhead line of up to 400kV supported on steel towers.

Our work here means we can take down 30km of existing 132kV line and steel towers between Newton Stewart and Glenlee.

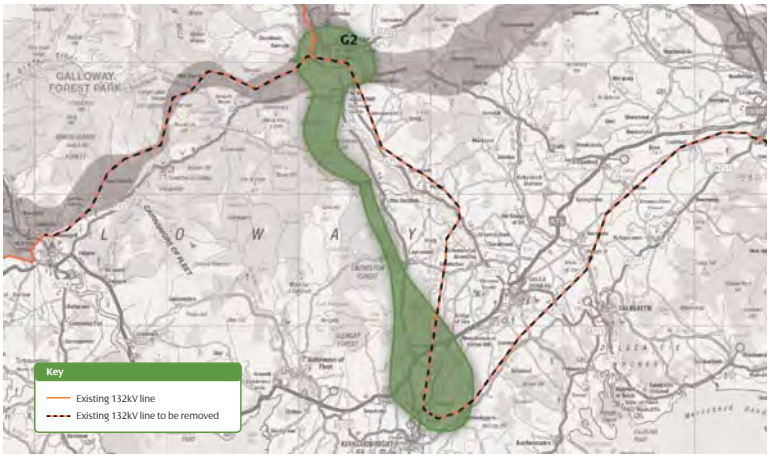
Tell us what you think at **www.spendgsr.co.uk**

Don't forget the consultation ends at midnight on **July 24, 2015**.

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

Zone 3: Glenlee to Tongland



From the preferred siting area for the new Glenlee substation (G2), the preferred corridor heads south through plantation forests at Cairn Edward Hill and Laurieston Forest to connect to the existing substation at Tongland.

Tongland is the site of a hydro-electric power station, which is one of the existing Galloway Hydro schemes.

This section will involve a new overhead line of 132kV supported on steel towers.

We may need to extend the existing substation at Tongland, although this will be contained within the current site boundary and is not part of this consultation.

It means we can take down 33km of existing 132kV line and towers between Tongland and Glenlee, some of which crosses Loch Ken, which is designated as an important site for birds.

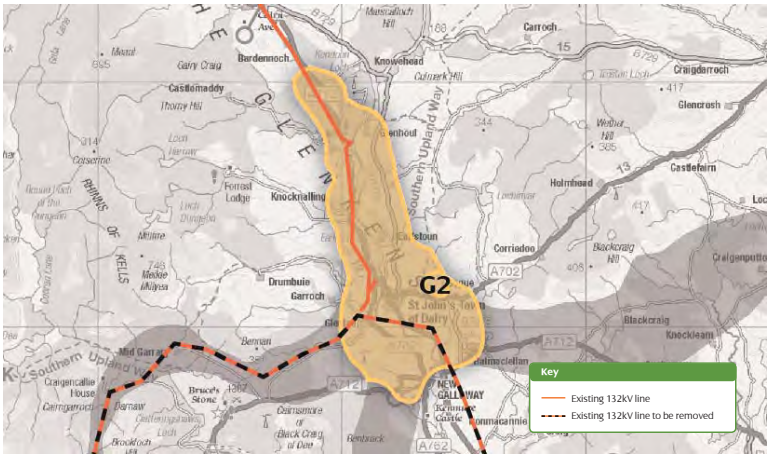
Tell us what you think at **www.spendgsr.co.uk**

Don't forget the consultation ends at midnight on **July 24, 2015**.

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

Zone 4: Glenlee to Kendoon



From the preferred siting area for a new substation for Glenlee (G2), our preferred corridor heads north, following the existing 132kV overhead line to Kendoon.

Kendoon is the site of a hydro-electric power station, which is one of the existing Galloway Hydro schemes.

This section will involve a new 132kV overhead line supported on steel towers.

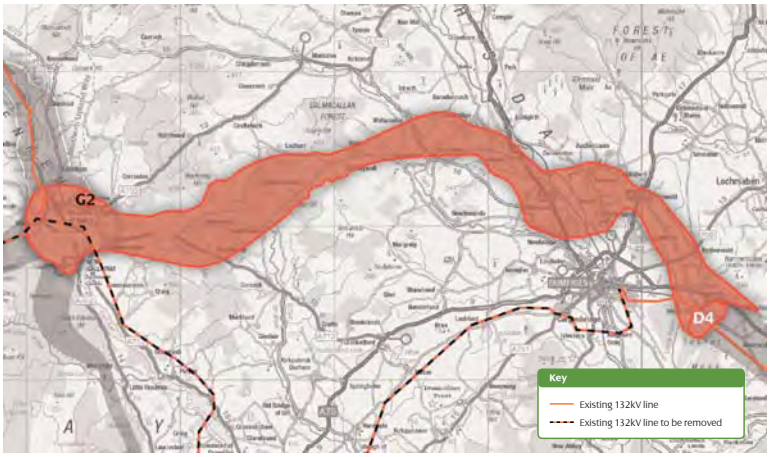
Tell us what you think at **www.spendgsr.co.uk**

Don't forget the consultation ends at midnight on **July 24, 2015**.

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

Zone 5: Glenlee to Dumfries



From our preferred siting area for a new substation at Glenlee (G2), the preferred corridor passes New Galloway and St John's Town of Dalry, and north of Dunscore. Here it turns south eastwards to pass north of Locharbriggs before finishing at our preferred siting area for a new substation near Dumfries (site D4).

This section will involve a new high voltage overhead line of up to 400kV supported on steel towers.

Our work here will let us take down 44km of existing 132kV line and towers between Dumfries and Tongland, which is close to the Solway Coast.

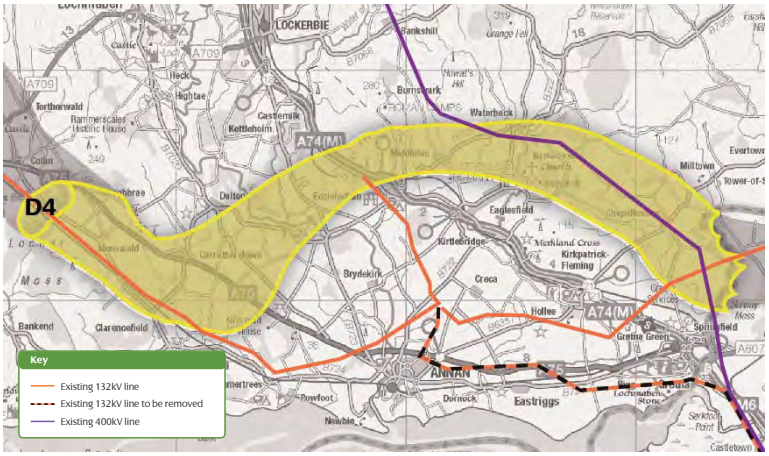
Tell us what you think at **www.spendgsr.co.uk**

Don't forget the consultation ends at midnight on **July 24, 2015**.

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

Zone 6a: Dumfries to English border



From our preferred siting area for a new substation near Dumfries (D4), the preferred corridor travels south east following the route of the existing 132kV line and the A75 for a short distance. At Carrutherstown it turns north east to pass north of Ecclefechan before heading slightly southwards to cross the border into England.

This section will involve new a high voltage overhead line of up to 400kV supported on steel towers.

Our work here means we can take down around 15km of existing 132kV line from Chapelcross to the border. This line, which passes north of Annan and south of Gretna, can be seen from the Solway Coast.

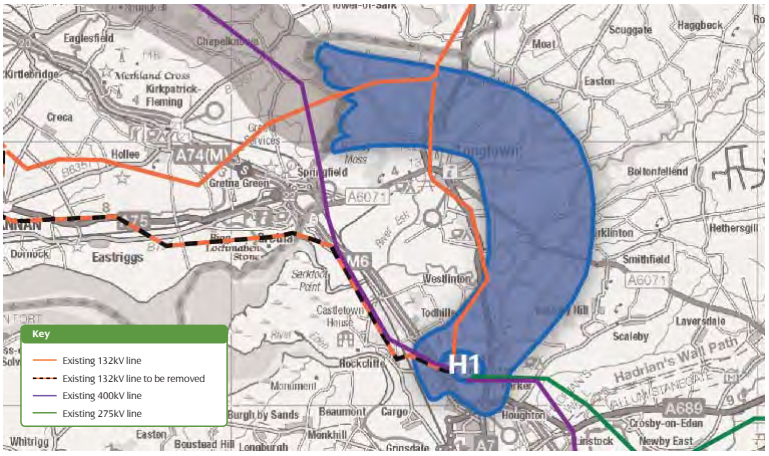
Tell us what you think at **www.spendgsr.co.uk**

Don't forget the consultation ends at midnight on **July 24, 2015**.

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

Zone 6b: English border to Harker



The final section of preferred corridor enters England, passing north and east of Longtown before turning south to link up to the existing high voltage National Grid substation at Harker, in Cumbria, near site H1.

This section will involve a new overhead line of up to 400kV supported on steel towers.

Our work here means we may be able to take down up around 8.5km of existing 132kV line close to the Solway Estuary between the border and Harker.

It is not proposed to build a new substation at H1, however the existing Harker substation may need to be modified or extended. As our project develops we will be able to give you more information and, if necessary, ask for your views in a future round of consultation.

Tell us what you think at **www.spendgsr.co.uk**

Don't forget the consultation ends at midnight on **July 24, 2015**.

SP ENERGY NETWORKS

Dumfries and Galloway Strategic Reinforcement Project

What happens next?

A view over Loch Ken towards existing 132kV overhead lines.

Although we have a statutory duty to reinforce our electricity transmission system in Dumfries and Galloway, we want to make sure it happens in the best way for local communities. That's where you come in. Your views will help make sure we are aware of all the potential implications at every stage.

Tell us what you think at **www.spendgsr.co.uk**

Ultimately, Scottish Ministers and the Secretary of State for Energy and Climate Change will decide whether to give our project development consent, and our regulator Ofgem will need to approve the funding, so we're at the start of a long process.

There will be a number of rounds of public consultation as the Dumfries and Galloway Strategic Reinforcement Project develops.

After each round we will produce a consultation report showing how your views have been taken into account to influence the next stage of the process.

Although we can't respond to comments individually, if you register your email address on our website we can let you know when the consultation reports are available, or when there is any other news.

Our aim is to submit a formal application for development consent in 2019 and to have the system up and running by 2023.

Appendix N: Press release for consultation launch

SP Energy Networks Begins Consultations on Proposed Dumfries and Galloway Strategic Reinforcement Project

SP Energy Networks is to hold a series of public consultation events in June to discuss their initial proposals for upgrades to the electricity network in the south of Scotland.

The Dumfries and Galloway Strategic Reinforcement Project aims to modernise the electricity network, making it more resilient for homes and businesses, as well as increasing capacity. Much of the existing 132,000 volt (132kV) system is coming towards the end of its operational life, and the project proposes a new a high voltage overhead line of up to 400,000 volts (400kV) between Auchencrosh in South Ayrshire and Harker in Cumbria.

In other locations the company has plans to replace old 132kV power lines with new ones at the same voltage and, in certain locations, remove old power lines altogether. As part of the upgrade plans four new substations are also being proposed at Auchencrosh, Newton Stewart, Glenlee and Dumfries.

The initial consultation stage will seek views on a broad corridor of land that has been identified between Auchencrosh and Harker where potential routes for a new overhead line could be situated. Broad siting areas have also been identified where the substations could be built.

The following public consultation exhibitions have been arranged:

1. Tuesday June 9, 2pm until 8pm
Barrhill Memorial Hall, Main Street, KA26 0PP
2. Wednesday June 10, 2pm until 8pm
New Galloway Town Hall, High Street, DG7 3RL
3. Thursday June 11, 2pm until 8pm
McMillan Hall, Dashwood Square, Netwon Stewart, DG8 6EQ
4. Tuesday June 16, 2pm until 8pm
Cairndale Hotel, English Street, Dumfries, DG1 2DF
5. Wednesday June 17, 2pm until 8pm
Locharbriggs Community Centre, Auchencrieff Road, DG1 1UX
6. Thursday June 18, 2pm until 8pm
Kirkcudbright Community Centre, St Marys Wynd, DG6 4JN
7. Tuesday June 23, 2pm until 8pm
Ecclefechan Village Hall, Ecclefechan, DG11 3DR
8. Wednesday June 24, 2pm until 8pm
Hetland Hall Hotel, Carrutherstown, DG1 4JX
9. Thursday June 25, 2pm until 8pm
Longtown Community Centre, Arthuret Road, CA6 5SJ

Copies of the project documents will also be available to view at a number of information points across South Ayrshire, Dumfries, Galloway and Cumbria from June 1st. The project website provides details on the information points, and all of the ways that residents can comment on the plans www.spendgsr.co.uk

The responses received from the consultation process will help to inform SP Energy Networks' plans, and help to determine the areas that will be progressed to the next stage of the routeing process.

Further studies will then also be undertaken, which will allow the company to identify the preferred line routes and substation sites for the project.

A second round of consultation on the preferred line routes and substation sites will be carried out within the next year.

Ends

Appendix O: Media outlets for newspaper adverts and publication dates

Title	Publication dates
Ayrshire Post	Fri May 29
Galloway News	Thu May 28
D&G Standard	Fri May 29
Stranraer & Wigtownshire Free Press	Wed May 27
Galloway Gazette	Fri May 29
Carrick Gazette and Girvan News	Fri May 29
Dumfries Courier	Fri May 29
Annandale Observer	Thu May 28
Cumberland News	Fri May 29

Appendix P: Press release announcing extension of consultation

SP Energy Networks Extends Consultation Deadline for Dumfries and Galloway Strategic Reinforcement Project

SP Energy Networks is to extend the deadline for feedback on its proposed Dumfries and Galloway Strategic Reinforcement project from July 24th to August 31st. Following feedback received from the public consultation, which was launched at the start of June, the company wants to ensure that communities have as much time as they need to review the details of the project, and want to encourage as many people as possible to submit their views.

The project team carried out ten public consultation events during June and July, and over 700 people came along to look at the plans and discuss the proposals with the project team. Over 14,000 letters were also sent out to residents across the region, with details on how to access the plans and how to submit feedback.

Colin Brown, Project Manager at SP Energy Networks: "We take on board the feedback we receive, and it was clear that some members of the community were keen to have additional time to review the details of our proposals. We are happy to facilitate an extension to our deadline, because we want to encourage as many people as possible to share their views. We look closely at all of the feedback that we receive, and this helps to shape our future plans."

"We have been very encouraged by the level of response that we have received so far, and we would like to thank everyone who has attended the public events and all of those who have contributed their feedback."

There are still many ways that members of the public can have their say on the project.

- All the main project documents are available online at www.spendgsr.co.uk
- Printed copies of documents can be viewed at a public information point across the region*
- Residents can also get more details by calling free on **0800 157 7353**, emailing on dgsr@communityrelations.co.uk or writing to **FREEPOST SPEN DGSR**

The Dumfries and Galloway Strategic Reinforcement Project aims to modernise the electricity network, making it more resilient for homes and businesses, as well as increasing capacity. Much of the existing 132,000 volt (132kV) system is coming towards the end of its operational life, and the

project proposes a new high voltage overhead line of up to 400,000 volts (400kV) between Auchencrosh in South Ayrshire and Harker in Cumbria.

In other locations the company has plans to replace old 132kV power lines with new ones at the same voltage and, in certain locations, remove old power lines altogether. As part of the upgrade plans four new substations are also being proposed at Auchencrosh, Newton Stewart, Glenlee and Dumfries.

The responses received from the consultation process will help to inform SP Energy Networks' plans, and help to determine the areas that will be progressed to the next stage of the routeing process. Further studies will then also be undertaken, which will allow the company to identify the preferred line routes and substation sites for the project.

A second round of consultation on the preferred line routes and substation sites will be carried out next year.

Ends

***Public Information Points:**

- Annan Customer Service Centre, High Street,Annan, DG12 6AQ
- Ballantrae Library, The Hall, Ballantrae, KA26 0NB
- Cumbria County Council, Reception area, The Courts, Carlisle, CA3 8NA
- Dalry Library, Main Street, St. John's Town of Dalry, DG7 3UP
- Dumfries Planning Office, Kirkbank, English Street, Dumfries, DG1 2HS
- Gretna Library, Central Avenue, Gretna, DG16 5AQ
- Kirkcudbright Customer Service Centre, High Street, Kirkcudbright, DG6 4JG
- Lochthorn Library, Edinburgh Road, Dumfries, DG1 1UF
- Lockerbie Customer Services Centre, 31 - 33 High Street, Lockerbie, DG11 2JL
- Longtown Library, Lochinvar Centre, Longtown, Cumbria, CA6 5UG
- Newton Stewart Library, Church Street, Newton Stewart, DG8 6ER
- Stranraer Planning Office , Ashwood House, Sun Street, Stranraer, DG9 7JJ

Appendix Q: Example of newspaper advert

Dumfries and Galloway Strategic Reinforcement Project

We'd like your views

SP ENERGY NETWORKS

SP Energy Networks needs to upgrade its electricity transmission network in Dumfries and Galloway, which is approaching the end of its operational life, to improve security of supply to around 83,000 people who live here and to increase the system's capacity.

We propose a new overhead line of up to 400kV between Auchencrosh, in South Ayrshire, through Dumfries and Galloway, to connect into the existing National Grid substation at Harker, near Carlisle in Cumbria. This would include building four new substations. We have identified a preferred corridor – a broad swathe of land – within which we believe a new line could be built. We have also identified four preferred siting areas where new substations could be built near Auchencrosh, Newton Stewart, Glenlee and Dumfries.

We want to hear local people's views on the preferred corridor and siting areas so we can take these into account as we develop our plans.

Our public consultation runs from **08 June** to **24 July**.

During June we will hold nine public exhibitions where you can view our proposals and ask questions of our project team.

Our project website www.spendgsr.co.uk also holds all the project documents and a list of public information points where you can view hard copies throughout the consultation period.

You can comment online at **www.spendgsr.co.uk** or contact us in one of the following ways:
Phone: **0800 157 7353**
Email: **dgsr@communityrelations.co.uk**
Post: **FREEPOST SPEN DGSR**

At this stage, your comments are not representations to the planning authority. If we do make an application for development consent in future, you will be able to make formal representations at that stage.

Public exhibitions (2pm until 8pm each day)

Barrhill Memorial Hall, Main Street, KA26 0PP	Tuesday June 9, 2015
New Galloway Town Hall, High Street, DG7 3RL	Wednesday June 10, 2015
McMillan Hall, Dashwood Square, Newton Stewart, DG8 6JL	Thursday June 11, 2015
Cairndale Hotel, English Street, Dumfries, DG1 2DF	Tuesday June 16, 2015
Locharbriggs Community Centre, Auchencrieff Road, DG1 1UX	Wednesday June 17, 2015
Kirkcudbright Community Centre, St Mary's Wynd, DG6 4JU	Thursday June 18 2015
Ecclefechan Village Hall, DG11 3DR	Tuesday June 23, 2015
Hetland Hall Hotel, Carrutherstown, DG1 4JX	Wednesday June 24, 2015
Longtown Community Centre, Arthuret Road, CA6 5SJ	Thursday June 25 2015

Public information points (available from June 1).

Opening hours vary. Please check before travelling.

DG Annan Customer Service Centre, High Street, Annan, DG12 6AQ.
Ballantrae Library, The Hall, Ballantrae, KA26 0NB.
Carlisle: Cumbria County Council, Reception area, The Courts, Carlisle, CA3 8NA.
Dalry Library, Main Street, St. John's Town of Dalry, DG7 3UP.
Dumfries Planning Office, Kirkbank, English Street, Dumfries, DG1 2HS.
Gretna Library, Central Avenue, Gretna, DG16 5AQ.
DG Kirkcudbright Customer Service Centre, High Street, Kirkcudbright, DG6 4JG.
Lochthorn Library (north Dumfries), Edinburgh Road, Dumfries, DG1 1UF.
DG Lockerbie Customer Services Centre, 31-33 High Street,Lockerbie, DG11 2JL
Longtown Library, Lochinvar Centre, Longtown, Cumbria, CA6 5UG
Newton Stewart Library, Church Street, Newton Stewart, DG8 6ER
Stranraer Planning Office, Ashwood House, Sun Street, Stranraer, DG9 7JJ

Appendix R: Letter announcing the extension of the consultation deadline

Contact: 0800 157 7353
Email:dgsr@communityrelations.co.uk

16 July 2015

Dear Sir or Madam,

Extension to first round of consultation for Dumfries & Galloway Strategic Reinforcement Project

The deadline for submitting feedback is now 31 August 2015.

We wrote to you at the end of May to tell you about our first round of consultation on the Dumfries and Galloway Strategic Reinforcement Project, which started on 08 June.

During this first round of consultation, several people have told us they would like more time to consider the project before giving us their comments. For this reason we have decided to extend the deadline for submitting feedback to 31 August (previously it was 24 July).

As you know, we are proposing a new high voltage overhead electricity line from Auchencrosh in South Ayrshire, through Dumfries and Galloway, to Harker, near Carlisle, Cumbria. We also need to build four new high voltage substations near Auchencrosh, Newton Stewart, Glenlee and Dumfries.

We are still at a very early stage and we would like as many people as possible to give us their views before we go any further. Here's how you can do it:

- Online, using the feedback form on our website at www.spendgsr.co.uk.
- Download a copy of our feedback form from the website and fill it in by hand.
- If you don't have access to the internet, you can request a form by calling free on 0800 157 7353, or by writing to FREEPOST SPEN DGSR, no stamp required.
- You can also submit feedback by letter to FREEPOST SPEN DGSR or by email to dgsr@communityrelations.co.uk.

For detailed maps and documents which explain how we route and site new power lines and substations, please visit our website. Hard copies of key project documents are also available at local information points. To find your nearest information point, please see the leaflet we sent you, check our website or call us on 0800 157 7353.

Yours faithfully,

Community Relations Team,
Dumfries & Galloway Strategic Reinforcement Project

Appendix S: Freepost envelope

Dumfries and Galloway Strategic Reinforcement Project - Important information enclosed

Front

If undelivered please return to:
FREEPOST SPEN DGSR

Back

Appendix T: Stakeholders consulted in the first round of consultation

Appendix T Stakeholders consulted in the first round of consultation

Consultees shown in this appendix were those identified and informed of the launch of the consultation in May 2015.

Further consultees who have made themselves known subsequently are not shown but their feedback has been considered in the same way and they will be added to distribution lists for future rounds of consultation.

Statutory consultees

Scottish Government ECU

Dumfries & Galloway Council

South Ayrshire Council

Cumbria County Council

Carlisle City Council

Scottish Natural Heritage

Natural England

Historic Scotland

Historic England

SEPA

Environment Agency

Planning Inspectorate

Forestry Commission Scotland

Key non-statutory consultees

Royal Society for the Protection of Birds Scotland

West of Scotland Archaeology Service

Ministry of Defence, Defence Infrastructure Organisation

Marine Scotland

Scottish Water

The Coal Authority

Association of Salmon Fishery Boards

Scottish Wildlife Trust

Cumbria Wildlife Trust

Other non-statutory consultees

Transport Scotland

Scottish Rights of Way and Access Society (ScotWays)

The Woodland Trust

Ramblers Association (Scotland)

The Crown Estate

Shell UK

National Farmers Union

Health and Safety Executive

NSIP (Health and Safety Executive)

Architecture and Design Scotland

National Trust for Scotland

Civil Aviation Authority

National Air Traffic Services

Scottish Badgers

Royal Commission on Ancient & Historic Monuments

British Trust for Ornithology Scotland

BT

RAF

John Muir Trust

Nuclear Safety Directorate (HSE)

Cumbria Tourism

DEFRA

Electricity North West

GTC (Gas Transportation Company Ltd.)

Highways England

Joint Nature Conservation Committee

Network Rail

OFCOM

OFWAT

Solway Coast AONB

Independent Power Networks Limited

Mountaineering Council of Scotland

Sustrans Scotland

Visit Scotland

British Trust for Ornithology

WWT Caerlaverock Wetland Centre

Local interest groups and organisations

Ayrshire Chamber of Commerce

Dumfries and Galloway Chamber of Commerce

Destination Dumfries and Galloway

Visit Scotland

National Farmers Union Scotland

National Farmers Union Scotland

Southern Uplands Partnership

Solway Coast AONB

Solway Firth Partnership

Scottish Wildlife Trust Galloway Group

Crichton Institute

Federation of Small Businesses D&G Branch

Local Energy Scotland

Energy Agency

Community Energy Scotland

Cree Valley Community Woodland Trust

Cumbria Wildlife Trust

Cumbria Chambers of Commerce (Carlisle)

CARLISLE NATURAL HISTORY SOCIETY

Community & Parish Councils

Annandale and Eskdale Federation of Community Councils

Arthuret Parish Council

Auldgirth and District Community Council

Ballantrae Community Council

Balmaclellan Community Council

Balmaghie Community Council

Barrhill Community Council

Broader Machars Federation of Community Councils

Canonbie and District Community Council

Carsphairn Community Council

Closeburn Community Council

Colmonell and Lendalfoot Community Council

Corsock and Kirkpatrick Durham Community Council

Cree Valley Community Council

Cummertrees and Cummertrees West Community Council

Dalry Community Council

Dalton and Carrutherstown Community Council

Dunscore Community Council

Glencairn Community Council

Heathhall Community Council

Hethersgill Parish Council

Hoddom and Ecclefechan Community Council

Holywood and Newbridge Community Council

Keir Community Council

Kingmoor Parish Council

Kirkandrews-on-Esk Parish Council

Kirklinton Middle Parish Council

Kirkmahoe Community Council

Kirkpatrick Fleming and district Community Council

Kirtle and Eaglesfield Community Council

Locharbriggs Community Council

Lockerbie and District Community Council

Lower Nithsdale Federation of Community Councils

Middlebie and Waterbeck Community Council

Mouswald Community Council

Pinwherry Community Council

Rockcliffe Parish Council

Royal Burgh of Kirkcudbright and District

Ruthwell and Clarencefield Community Council

Scaleby Town Council

Springfield and Gretna Green Community Council

Stanwix Rural Parish Council

The Royal Burgh of New Galloway and Kells Parish Community Council

Tinwald Parish Community Council

Tongland and Ringford Community Council

Torthwald Community Council

Twynholm Community Council

Westlinton Parish Council

MPs and MSPs

Corri Wilson MP

Rt Hon David Mundell MP

Richard Arkless MP

John Stevenson MP

Rory Stewart MP

Dr Elaine Murray MSP

Rt. Hon. Alex Fergusson MSP

John Scott MSP

Dr Aileen McLeod MSP

Graeme Pearson MSP

Chic Brodie MSP

Paul Wheelhouse MSP

Claudia Beamish MSP

Jim Hume MSP

Joan McAlpine MSP

Councillors

South Ayrshire Council

Girvan and South Carrick	Alec Clark
Girvan and South Carrick	John McDowall
Girvan and South Carrick	Alec Oattes

Dumfries & Galloway Council

Abbey	Ian Blake
Abbey	Rob Davidson

Abbey	Tom McAughtrie
Abbey	Davie Stitt
Annandale East and Eskdale Ward	Karen Carruthers
Annandale East and Eskdale Ward	Archie Dryburgh
Annandale East and Eskdale Ward	Denis Male
Annandale East and Eskdale Ward	Craig Peacock
Annandale North Ward	Peter Diggle
Annandale North Ward	Gail McGregor
Annandale North Ward	Graeme Tait
Annandale North Ward	Stephen Thompson
Annandale South Ward	Richard Brodie
Annandale South Ward	Ian Carruthers
Annandale South Ward	Sean Marshall
Annandale South Ward	Ronnie Ogilvie
Castle Douglas and Glenkens Ward	Finlay Carson
Castle Douglas and Glenkens Ward	Brian Collins
Castle Douglas and Glenkens Ward	George Prentice
Dee Ward	Patsy Gilroy
Dee Ward	Jane Maitland
Dee Ward	Colin Wyper
Lochar Ward	Ivor Hyslop
Lochar Ward	Jeff Leaver
Lochar Ward	Yen Hongmei Jin
Lochar Ward	Ted Thompson
Mid and Upper Nithsdale Ward	Jim Dempster
Mid and Upper Nithsdale Ward	Gillian Dykes
Mid and Upper Nithsdale Ward	John Syme

Mid and Upper Nithsdale Ward	Andrew Wood
Mid Galloway Ward	Alistair Geddes
Mid Galloway Ward	Jim McColm
Mid Galloway Ward	Graham Nicol
Nith Ward	Jack Groom
Nith Ward	John Martin
Nith Ward	Colin Smyth
Nith Ward	Alastair Witts
North West Dumfries Ward	Graham Bell
North West Dumfries Ward	Andy Ferguson
North West Dumfries Ward	David McKie
North West Dumfries Ward	Ronnie Nicholson
Wigtown West	Grahame Forster
Wigtown West	Jim McClung
Wigtown West	Roberta Tuckfield
Stranraer and North Rhins	Iain Dick
Stranraer and North Rhins	Marion McCutcheon
Stranraer and North Rhins	Willie Scobie

Cumbria County Council

Carlisle Local Committee member	John Bell
Carlisle Local Committee member	Robert Betton
Carlisle Local Committee member	Christine Bowditch
Carlisle Local Committee member	Deborah Earl
Carlisle Local Committee member	Beth Furneaux
Carlisle Local Committee member	Bill Graham
Carlisle Local Committee member	Elizabeth Mallinson

Carlisle Local Committee member	Alan McGuckin
Carlisle Local Committee member	Nick Marriner
Carlisle Local Committee member	Alan Toole
Carlisle Local Committee member	Reg Watson
Carlisle Local Committee member	Stewart Young
Carlisle Local Committee member	Cyril Weber
Carlisle Local Committee member	Lawrence Fisher
Carlisle Local Committee member	Hugh McDevitt

Carlisle City Council

Longtown and Rockcliffe	Raynor Bloxham
Longtown and Rockcliffe	John Mallinson
Lyne	David Shepherd
Stanwix Rural	James Bainbridge
Stanwix Rural	Marilyn Bowman

Appendix U: Letters to stakeholders announcing the consultation launch

Contact: 0800 157 7353
Email:dgsr@communityrelations.co.uk

22 May 2015

Dear

Dumfries & Galloway Strategic Reinforcement Project
Public consultation in your area from June 8 until July 24, 2015

I'd like to tell you about a consultation SP Energy Networks is launching in Dumfries and Galloway, and parts of South Ayrshire and Cumbria, and invite you to take part. We will be presenting information at a council briefing shortly but I thought you might like the chance to read the enclosed project leaflet in advance.

As you know, we are the electricity transmission and distribution company for central and southern Scotland, connecting two million people to the electricity they need.

We need to upgrade our network in Dumfries and Galloway, which is approaching the end of its operational life. This would improve security of supply to around 83,000 people. We also need to increase the network's capacity to connect future sources of generation and provide important strategic links between Northern Ireland and England.

We propose a new overhead line of up to 400kV between Auchencrosh, in South Ayrshire, through Dumfries and Galloway, to connect into the existing National Grid substation at Harker, near Carlisle in Cumbria. This would include building four new substations.

We are at an early stage, seeking views on our preferred corridor and preferred siting areas for substations. The project leaflet has more detail plus the locations of nine exhibitions.

More information, including how we arrived at our preferred areas, and other areas we considered, is on our project website, www.spendgsr.co.uk. You can also comment online.

I hope to see you at our forthcoming presentation and at one of our exhibitions..

Yours sincerely,

Stephen Jack
Dumfries and Galloway Strategic Reinforcement Project Team,
SP Energy Networks

Ochil House, 10 Technology Park, Blantyre. G72 0HT

Appendix V: Public exhibition attendance

Date	Location	Attendance
09/06/2012	Barrhill	29
10/06/2015	New Galloway	71
11/06/2015	Newton Stewart	76
16/06/2015	Dumfries	88
17/06/2015	Locharbriggs	91
18/06/2015	Kirkcudbright	51
23/06/2015	Ecclefechan	64
24/06/2015	Carrutherstown	54 + 11 school children/2 teachers
25/06/2015	Longtown	46
14/07/2015	Dunscore	118
12/08/2015	Torthorwald	80
20/08/2015	Carrutherstown	24
24/08/2015	Ringford	13
		TOTAL 805 (+ 13 from school)

Appendix W: Pro-forma responses

SP ENERGY NETWORKS ROUTING AND CONSULTATION FEEDBACK

Scottish Power Energy Networks' proposal to erect a line of high voltage electricity pylons along their 'preferred' route through Dumfries and Galloway is **unacceptable** because:

- ☐ *There is a pre-existing route of electricity pylons over fifty years old, running mostly alongside the A75/M74. This new line should be sited along this established route.*
- ☐ *Any new route through rural areas should be buried underground, following the example of Steven's Croft Biomass Power Station.*
- ☐ *The new line should, like the Western and Eastern HVDC routes from Scotland to England, travel under the sea to Cumbria.*
- ☐ *It would be extremely dangerous to site pylons in many of the areas situated in the 'preferred' route as they form part of the Ministry of Defence strategic low flying designated area.*
- ☐ *Siting pylons through rural areas would be disproportionately devastating for wildlife, local residents, and the natural amenity of the rural area.*
- ☐ *Tourism, which is very important to rural areas, would be seriously affected by the sight of an industrial high voltage line through some of Dumfries and Galloway's most scenic and peaceful countryside.*
- ☐ *The road network, often single track, within the 'preferred' route, is complete unsuitable for construction traffic, and major works would be required before construction on the line could begin, causing even more, unnecessary disruption.*
- ☐ *A great deal of the preferred route is through uniquely unspoilt countryside. Just because it is identified as being rural does not justify spoiling this virgin countryside.*

Name & address: [redacted]

☐ I would like SP Energy Networks to keep me informed of all matters relating to the proposed Dumfries and Galloway Strategic Reinforcement project:

By post / By email: ..... [redacted]

SP Energy D&G Strategic Reinforcement Project
Routeing and Consultation feedback

SP Energy Networks' proposal to erect a new line of electricity pylons along their preferred corridor through Dumfries and Galloway is unacceptable because:

- There is a pre-existing route running along the A75/M74. Any updating of the line should be sited along this established route. People buying homes close to this line did so in the knowledge of its existence.

- Siting pylons on a new route through the heart of Dumfries & Galloway will spoil lovely countryside.

- Any new sections through rural areas should be buried underground as happened with Dalswinton wind farm.

- The area is used for low flying by the MoD.

- Power lines and pylons may damage the sense of well-being and health of residents by being a dominant feature in the landscape.

- Any connection needed to the Moyle sub sea interconnector to Northern Ireland should be sub-sea to Harker in Cumbria.

- Tourism is very important to this area and would be seriously affected by the sight of industrial high voltage line through some of Dumfries and Galloway's most scenic and peaceful countryside

- Construction work would be disruptive to the tranquil quality of Dumfries and Galloway, its residents and visitors.

Signed:....

Name:.....

Address:...

SP Energy D&G Strategic Reinforcement Project
Routeing and Consultation feedback

SP Energy Networks' proposal to erect a new line of electricity pylons along their preferred corridor through Dumfries and Galloway is unacceptable because:

- There is a pre-existing route running along the A75/M74. Any updating of the line should be sited along this established route.
- Any connection needed to the Moyle sub sea interconnector to Northern Ireland should be sub-sea to Harker in Cumbria.
- Any new sections through rural areas should be buried underground. Pylons of 50m tall will dominate homes.
- Tourism is very important to this area and would be seriously affected by the sight of industrial high voltage line through some of Dumfries and Galloway's most scenic and peaceful countryside.
- Siting pylons through well-populated areas will affect property prices, sense of well being and health of residents.
- The cultural heritage of the area is important to residents and visitors. Pylons over the land Robert Burns farmed, and drew inspiration from, is a national outrage.
- Construction work would be disruptive to the tranquil quality of Dumfries and Galloway.

Signed:.....

Name:.....

Address:.....

SP Energy D&G Strategic Reinforcement Project
Routeing and Consultation feedback

SP Energy Networks' proposal to erect a new line of electricity pylons along their preferred corridor through Dumfries and Galloway is unacceptable because:

- Tourism is very important to our local economy and would be seriously affected by the sight of industrial high voltage line through some of Dumfries and Galloway's most scenic and peaceful countryside.

- Tourism generated over £300m for Dumfries and Galloway last year. The reason visitors come here is for the landscape and cultural heritage. Pylons across the region will damage this growth industry.

- Local attractions that will be affected by a pylon route are
  Ellisland Farm where Robert Burns produced his best and most famous songs and poems; **Portrack Garden of Cosmic Speculation**, one of Europe's most celebrated gardens and landscapes; **Allanton Peace Sanctuary**, an NGO, attracting international visitors to the tranquil surroundings.

- As a community we have invested time and money creating a woodland and community walk and you are threatening to put pylons through the middle.

- There is a pre-existing route running along the A75/M74. Any updating of the line should be sited along this established route preferably buried underground.

- Any high voltage connections should be sub-sea..

- Building pylons through well-populated areas will affect property prices.

-

Signed:

Name:

Address

SP ENERGY NETWORKS ROUTING AND CONSULTATION FEEDBACK

Scottish Power Energy Networks' proposal to erect a line of high voltage electricity pylons along their 'preferred' route through North Cumbria is **unacceptable** because:

☑ *The route through Cumbria should follow the A74/ West Coast Mainline corridor, already blighted by 400kV lines*

☑ *Any new route through rural areas should be buried underground, following the example of Steven's Croft Biomass Power Station.*

☑ *The new line should, like the Western and Eastern HVDC routes from Scotland to England, travel under the sea to Cumbria.*

☑ *It would be extremely dangerous to site pylons in many of the areas situated in the 'preferred' route as they form part of the Ministry of Defence strategic low flying designated area.*

☑ *Siting pylons through rural areas would be disproportionately devastating for wildlife, local residents, property values and the natural amenity of the rural area.*

☑ *Tourism, which is very important to rural areas, would be seriously affected by the sight of an industrial high voltage line through some of North Cumbria's most scenic and peaceful countryside.*

☑ *A great deal of the preferred route is through uniquely unspoilt countryside. Just because it is identified as being rural does not justify spoiling this virgin Countryside.*

☑ *The plan pre-dates the cut in subsidy to on-shore windfarms and is accordingly of far too high capacity for the expected output*

Name & address: .....

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By post / By email: .....