SP ENERGY NETWORKS

# The Dumfries and Galloway Strategic Reinforcement Project

## First round of consultation: summary of feedback

February 2016

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**SP Energy Networks**
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# Contents

## Figures



## Appendices

# Purpose of this document

SP Energy Networks (SPEN) is pleased to provide the following report summarising the feedback received during the first round of public consultation, carried out over three months in 2015, on the proposed Dumfries and Galloway Strategic Reinforcement Project. The consultation was extended for five weeks to allow as many people as possible to put forward their views. In total more than 1,600 pieces of feedback were received, which have been scrutinised.

Since we launched the consultation process a number of significant developments in the wider energy sector materialised that have the potential to influence the scale and nature of the project. Although it remains the case that investment is required to replace the ageing infrastructure in the Dumfries and Galloway region, SP Energy Networks and National Grid, in its role as GB Transmission System Operator, are undertaking further analysis to determine the extent to which changes to subsidy arrangements for onshore wind farms and in the future mix of power generation in Scotland alter plans for the development of the electricity transmission network. The purpose of this work is to determine the most appropriate way forward for the development of the transmission system to maintain its high standard of reliability whilst facilitating development of new generation sources.

As was made clear throughout the first round of consultation, the project was in its early stages. In the documentation published last year, we indicated our aim to carry out a second round of consultation in 2016 on preferred routes and substation sites. Given the feedback we have received and the changes that have occurred since then, we believe it is necessary to take more time to consider the issues so that the most appropriate proposal is taken forward to the next stage of the process. Once we have the results of the studies that are underway, we will be in a position to set out any implications on the scope of the project and how the input received during the first round of public consultation has been taken into account.

# Executive summary

## Background

The existing electricity network in Dumfries and Galloway is typically a 132 kilovolt (kV) interconnected system with a separate 275kV circuit from Auchencrosh to Coylton, both in south Ayrshire. Significant developments have taken place since much of the network was constructed in the 1930s and the needs of the electricity system and its different users have changed during this time.

The current network has inadequate capacity for the renewable generation that is contracted to connect in south-west Scotland. The infrastructure is also approaching the end of its life and the network is not fit for purpose. It is therefore essential to improve capacity and the security of supply for existing and future users of this network through major investment that will serve for the next 60-70 year period.

In response to the existing limitations and constraints, SPEN proposes to develop a new high voltage electricity transmission network of up to 400kV from Auchencrosh to Harker in Cumbria.

This upgraded transmission network will replace existing end-of-life infrastructure and enhance local electricity security of supply. It will also provide capacity for future renewable energy connections which are required to meet Scotland's renewable energy targets, as well as enabling import and export of electricity through the Northern Ireland ('Moyle') interconnector. As part of the upgrade, SPEN also intends to remove approximately 130km of existing 132kV lattice steel tower overhead line infrastructure that is no longer required.

The DGSR Project consists of proposals for:

- A new high voltage overhead line of up to 400kV from Auchencrosh, in South Ayrshire, through Dumfries and Galloway, to Harker, near Carlisle;
- Two new 132kV overhead lines from Glenlee to Tongland and from Glenlee to Kendoon;
- Four new high voltage substations at Auchencrosh, Newton Stewart, Glenlee and Dumfries; and
- Removing around 130km of existing 132kV overhead electricity lines.

## First round of consultation

SPEN attaches great importance to the effect that its work may have on the environment and on local communities. In seeking to achieve 'least disturbance', SPEN has sought to engage with key stakeholders including local communities and others who may have an interest in the project at a stage where they can have an influence on the development of its proposals.

The first round of consultation, which took place during 2015, is intended to be the first of up to four rounds of consultation in advance of consent applications being submitted to the Scottish Ministers and the Secretary of State for Environment and Climate Change.

The first round of consultation focused on preferred corridors for a high voltage overhead line and preferred siting areas for four new high voltage substations.

SPEN posted leaflets (Appendix F) to more than 14,000 homes and businesses within a kilometre of the preferred corridors in parts of South Ayrshire, Dumfries and Galloway and Cumbria. The

leaflet provided an overview of the project, explained how people could find out more detailed information and set out how they could make their views known.

A new section of the SPEN website was developed to support the consultation, with its own domain name for ease of reference: www.spendgsr.co.uk.

Briefings were offered to elected representatives of all four affected local authorities, local Members of the Scottish Parliament and local Members of Parliament. Information was also sent to other statutory consultees, including community and parish councils, as well as non-statutory organisations and local interest groups, to encourage participation in the consultation.

A bespoke feedback form (Appendix G), was developed, which could be completed online or downloaded for print via the consultation website. Hard copies were also available at exhibitions, or on request to the dedicated project email address, freepost address or freephone number. Feedback could also be submitted without a feedback form via the project email address, freepost address or phone number.

During the first round of consultation, SPEN held 13 drop-in exhibitions and events across South Ayrshire, Dumfries and Galloway and Cumbria which were attended by 805 people. Members of the project team also attended meetings of community and parish councils on request and actively engaged with a number of local interest groups.

## Feedback

The views of local people, organisations and bodies are very important to the effective development of the project. During the first round of consultation, some 1,638 pieces of feedback were received from 1,408 individual consultees and organisations. This included 425 official consultation feedback forms and 1,227 pieces of feedback in other formats, of which there were 53 items from statutory organisations. Every feedback form, letter and email received was recorded, and the feedback analysed and considered.

This report summarises the feedback received. The project team continues to consider all of the feedback received as part of the decision making process.

## Comments on the project in general

It was clear from the feedback received that a large number of respondents were unhappy at the potential visual impact of a high voltage overhead line on the landscape of Dumfries and Galloway. A large number of respondents felt SPEN should put the connection in the sea or underground. They felt a subsea connection would have the least visual impact and the least impact on tourism and the wider economy, such as property values, as well as being a better option environmentally.

A large number of respondents also pointed to the announcement in June 2015 by the UK Secretary of State for Energy and Climate Change, Amber Rudd, to end new UK Government subsidies for onshore wind farms. The announcement came after the consultation had started. People felt this might be a significant change which could affect the level of additional transmission capacity required in Dumfries and Galloway. Respondents felt any reduction in required capacity could give SPEN more options for mitigating the impact of the project through

whole or partial use of subsea or underground cables. Many called on SPEN to rethink or pause the project to consider any implications of the announcement.

To read summaries of the feedback received about the project need and the strategic options considered, please see Chapter 6. More details of the feedback received from key consultee groups is included in Appendices A to E. Where appropriate this has been itemised by organisation.

## Comments on the preferred corridors

A large number of respondents objected to the preferred corridors in areas where there is currently no transmission line. Many felt any new overhead lines should follow the routes of the existing transmission lines as closely as possible. There was a perception that areas close to existing lines had already to some extent been compromised visually and that people and the environment had adapted to it. However, there were also concerns expressed in areas where the preferred corridors do include the route of existing lines, due to the increased height of new infrastructure.

Many people identified valued locations of cultural, historical, environmental and landscape interest as well as giving details of particularly prized views, areas considered important for tourism and individual details of existing and planned development or economic activity.

People also asked SPEN to consider a number of natural or man-made features within corridors as potential constraints, even though these would not normally be significant enough to influence routeing or siting decisions on their own.

To read summaries of the feedback received on the preferred corridors, please see Chapter 8.

## Comments on the substation siting areas

There were localised concerns about the preferred substation siting areas, particularly in Newton Stewart, where respondents were concerned about the potential impact on the setting of All Saints Church in Challoch. Respondents near Racks, Greenlea and Collin were concerned about the substation siting area near Dumfries, in particular the proximity to homes and businesses, and the possible impacts on tourism and recreation and health.

Some people expressed a strong preference for other siting areas considered by SPEN but not presented as preferred options. Others suggested a few new alternative siting areas, which they felt relevant and worthy of consideration.

To read summaries of the feedback received on the preferred substation siting areas, please see Chapter 8.

## Comments on SPEN's consultation

On its feedback form, SPEN asked respondents to comment on its consultation. Many respondents told us that the information presented was useful. However, they also challenged the consultation because a subsea/underground connection was not put forward as an option. There were also views put forward about the manner in which the consultation leaflets were delivered, the timing and duration of the consultation, and suggestions for future rounds.

To read summaries of the feedback received on the consultation, please see Chapter 9.

# 1. Introduction

## 1.1 Overview

1.1.1 This report describes the first stage of the pre-application process for the DGSR Project. It also provides a summary of the consultation feedback received in the first round of non-statutory consultation.

1.1.2 The scope of the first round of consultation was to invite the views of statutory and non-statutory consultees and the public and local communities close to the preferred corridors and substation siting areas on a range of issues.

1.1.3 The DGSR Project will be undertaken partly in Scotland and partly in England. As such, it must meet the requirements of the relevant consenting regimes in both countries. The part of the DGSR Project which lies in England constitutes a Nationally Strategic Infrastructure Project (NSIP). This requires SPEN to make a Development Consent Order application to the Planning Inspectorate. The application is subject to detailed statutory pre-application consultation procedures. There is no equivalent in Scotland, however SPEN is committed to undertaking pre-application consultation and intends to replicate the substantive elements of the Development Consent Order consultation process and report on such consultation. Please see section 3.2 of this report for more detail about this.

1.1.4 For the avoidance of doubt, the first round of consultation is not intended to fulfil the statutory requirements to consult about any proposed application which apply in England. It is a non-statutory round of consultation to give stakeholder organisations and the public an opportunity to shape the design of the project at a very early stage.

1.1.5 Notwithstanding this, SPEN has given regard to guidance and advice notes on pre-application consultation prepared by the *Scottish Government Energy Consents and Deployment Unit (ECDU)* and the *Department for Communities and Local Government (DCLG).*

1.1.6 This report details the consultation activities undertaken during the first round of non-statutory consultation.

1.1.7 The report will inform subsequent rounds of consultation and also the DGSR Project's final Statutory Pre-Application Consultation Report, which will be provided to the Scottish Government (for the parts of the project in Scotland) and the National Infrastructure Directorate of the Planning Inspectorate (for that in England). In England, the report will be provided for acceptance and subsequent examination if an application for consent is made.

## 1.2 SPEN's role

1.2.1 SPEN owns and operates the electricity transmission and distribution networks in central and southern Scotland through its wholly-owned subsidiaries SP Transmission plc (SPT) and SP Distribution plc (SPD). Its transmission networks are the backbone of the electricity system in its area, carrying large amounts of electricity at high voltages across long distances. The distribution networks are local networks, which take electricity from the transmission grid and bring it into the heart of communities. SPEN's transmission network in Scotland consists of 133 substations, more than 4,000km of overhead lines and more than 320km of underground cables.

1.2.2 The location of SPEN's transmission network – lying between the Scottish Hydro Electric (SHE) transmission network in northern Scotland and the Scottish islands, and the National Grid (NGET) transmission network in England – means it has a role linking the parts of the UK transmission system together. It is also connected to the Northern Ireland transmission network via a high voltage direct current (HVDC) subsea cable, which comes ashore at Auchencrosh, on the South Ayrshire coast. This cable is sometimes referred to as the 'Moyle' interconnector.

## 1.3 SPEN's commitment to engagement

1.3.1 Stakeholder and public involvement is an important component of the UK planning (and consenting) system. Legislation and government guidance aims to ensure that the public, local communities, statutory and other consultees and interested parties have an opportunity to have their views taken into account throughout the planning process.

1.3.2 SPEN attaches great importance to the effect that its work 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.

1.3.3 Its approach to stakeholder engagement for major electrical infrastructure projects is outlined in Chapter 5 of the document *Major Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment* (available to download from http://www.spendgsr.co.uk). SPEN aims to ensure effective, inclusive and meaningful engagement with local communities, statutory consultees, stakeholders and interested parties when undertaking electricity work, through the four key engagement stages outlined in paragraph 5.3 of that document.

1.3.4 In addition, SP Transmission plc, as holder of a transmission licence, has a duty under section 38 of and Schedule 9 to the *Electricity Act 1989*, when putting forward proposals for new electricity 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 work on communities. See Appendix H for a copy of the Schedule 9 Statement.

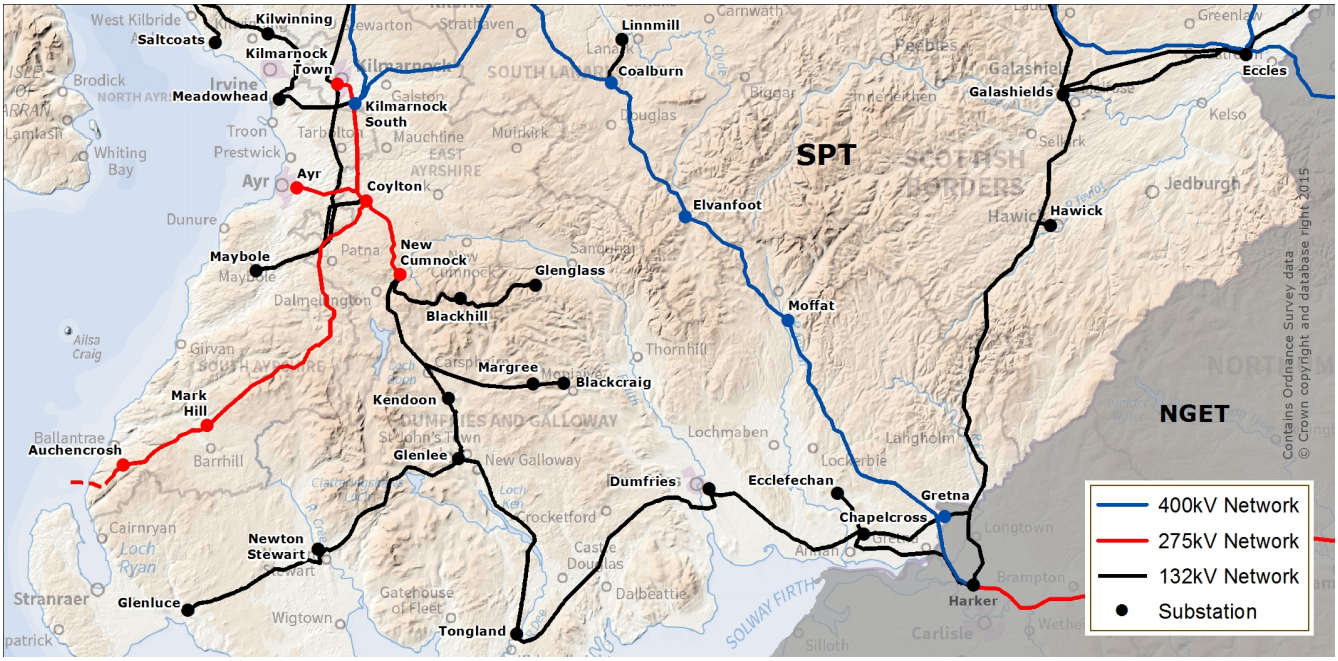
# 2. The DGSR project

## 2.1 About the project

2.1.1 The electricity transmission network in Dumfries and Galloway is a legacy network developed between the 1930s and 1970s to supply local customers and connect the area's hydro generation schemes. It includes approximately 200km of double circuit and single circuit 132kV overhead lines. The network serves more than 83,000 local customers.

2.1.2 The existing electricity transmission network is shown in **Figure 2.1.** The 132kV overhead line runs from Glenluce to Newton Stewart, then on to Glenlee, before heading north towards Dalmellington and south to Tongland from where it heads east via Dumfries towards Gretna, on the border with England. At Gretna it becomes 400kV to connect south to the National Grid substation at Harker, near Carlisle. A separate 275kV transmission line links Auchencrosh in South Ayrshire to Coylton in East Ayrshire.

**Figure 2.1 SPT electricity transmission network in South of Scotland**




2.1.3 When SPEN assessed the network as part of its asset replacement programme, more than 124km of the transmission lines in Dumfries and Galloway were found to be approaching the end of their operational life. Specifically these are the lines running from Kendoon to Glenlee, from Glenlee to Tongland, from Tongland to Dumfries and the two lines running from Chapelcross to Gretna and Harker. As assets get older, the need for maintenance work becomes more critical and more difficult, and the exposure to unplanned outages (faults) increases. Asset replacement is essential to provide secure, reliable supplies to existing and future customers.

2.1.4 At the same time, the electricity system in the UK is going through a transformational change with the move towards a low carbon economy. Traditional large fossil fuel centralised power stations are being replaced by renewable generating stations (mainly onshore wind farms) which are geographically more dispersed. The south west of Scotland is an area rich in renewable resources and significant investment is being made in wind farm development. There is more than 320MW of renewable energy connected to the Dumfries and Galloway network already, with another 350MW contracted to connect in the future. However, the transmission network is severely congested and no capacity is available for the transfer of this electricity. The area needs a new transmission network which is appropriately sized to meet the needs of existing users and allows SPEN to continue to fulfil its licence obligation to provide new generators with connection offers that allow them to export their electricity production to the network.

2.1.5 At Auchencrosh, a subsea HVDC cable known as the 'Moyle' interconnector comes ashore. It facilitates the transfer of energy between Great Britain and Ireland. The 'Moyle' interconnector is connected to SPEN's transmission network via a 275kV overhead line which runs from Auchencrosh to Coylton. The 'Moyle' interconnector allows up to 360MW of electricity to be imported to Scotland, but from 2018 this will change. The connection of additional renewable generation to the existing 275kV network in the Mark Hill area will limit 'Moyle' interconnector imports to around 80MW.

2.1.6 In 2010, as part of its submission to Ofgem through the RIIO-T1 price control review process, SP Transmission plc proposed a significant investment in the transmission network in the Dumfries and Galloway area to modernise and enhance the transmission infrastructure. It was recognised by Ofgem that a reinforcement solution would be required but the nature and scope of this solution would require further development. The proposed development is also shown in Scotland's Third National Planning Framework (NPF3), the spatial expression of the Government's economic strategy, which was published in 2014. NPF3 sets out a long-term vision for development and investment across Scotland over the next 20 to 30 years.

2.1.7 In summary, the three driving forces behind SPEN's DGSR Project are:

- Replacing ageing assets that are near the end of their life and maintaining secure supplies into the future;
- Increasing network capacity to allow renewable generation to connect in the immediate and long term; and
- Providing extra network capacity so that the 'Moyle' interconnector performs to its design potential rather than being inhibited by technical restrictions.

2.1.8 In addition, SPEN is obliged by its transmission licence to:

- Make sure electricity supplies are secure and reliable for the people who need them;
- Make the transmission system available to generators wishing to connect to it and ensure the system is fit for purpose;
- Plan and develop its transmission system in accordance with the GB *Security and Quality of Supply Standard* (SQSS) (available from http://www2.nationalgrid.com/uk); and
- Operate in the most efficient, coordinated and economic way.

## 2.2 Project development up to the first round of consultation

2.2.1 The development of the DGSR Project involved two stages:

- Strategic options – to identify where and by what means the modernisation and reinforcement of the electricity transmission network might be carried out in Dumfries and Galloway; and
- Corridors and substation siting area study – to identify preferred corridors and substation siting areas based on consideration of environmental and technical constraints.

### Strategic options

2.2.2 SPEN considered a number of high level strategic options to satisfy the three project drivers as part of the design process. This process balanced the technical, environmental and economic requirements and is detailed in the *Background to Need Case* document (available to download from http://www.spendgsr.co.uk).

2.2.3 As a result of this analysis, SPEN believes that there is a robust need case for an onshore reinforcement solution and this will be detailed in the formal submission to Ofgem in 2016.

2.2.4 SPEN is required to identify reinforcements that meet the technical requirements of the electricity network, which are economically viable, and cause, on balance, the least disturbance to the environment and the people who live, work and enjoy recreation within it.

2.2.5 As a result, SPEN's preferred solution is for an overland connection, which will enable the replacement of ageing assets, provide capacity for decades to come and create a new link between Auchencrosh and the GB-wide electricity transmission system, which is not subject to the existing limitations and constraints. This will consist of:

- A new high voltage transmission network of up to 400kV that runs from Auchencrosh in the west to Harker, in the east, including a new 132kV overhead line from Tongland to Kendoon; and
- Four new high voltage substations in the vicinity of Auchencrosh, Newton Stewart, Glenlee and Dumfries.

### Corridors and substation siting study

2.2.6 SPEN's *Routeing and Consultation Document* (available to download from http://www.spendgsr.co.uk) describes the routeing and siting methodology used for the DGSR Project.

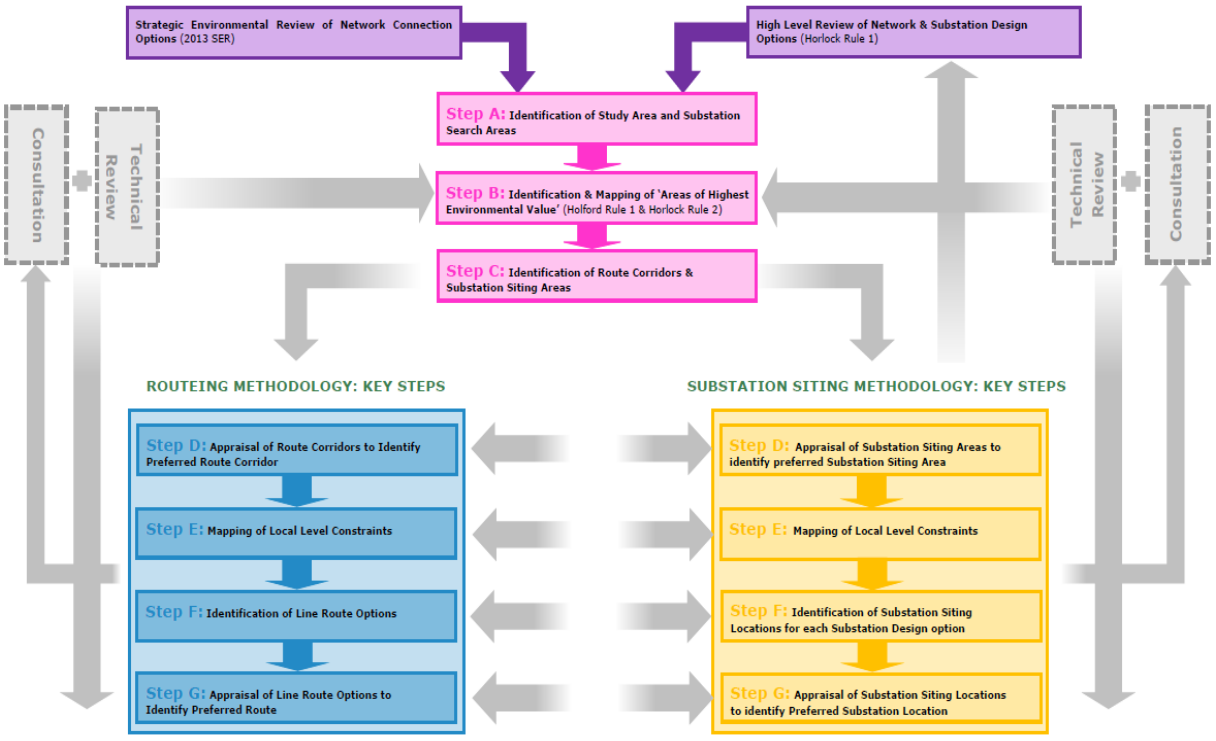
2.2.7 The initial stages of the routeing process, up until the first round of non-statutory consultation, comprised the identification of a study area for the overhead line and substation search areas, within which environmental characteristics were mapped to inform the identification of a number of route corridors and substation siting areas. These met SPEN's overarching objective for the DGSR Project:

*"To identify a technically feasible and economically viable route for continuous 275/400kV overhead line connection supported on lattice steel towers with associated substation infrastructure, connecting the existing network at Auchencrosh (South Ayrshire) to the existing network at Harker (Cumbria) via substations at Newton Stewart, Glenlee and Dumfries. The Project is also required to identify a new 132kV overhead line connection supported on lattice steel towers from Kendoon to Glenlee, and from Glenlee to Tongland. This route and the related connections, should, on balance, cause the least disturbance to the environment and the people who live, work and enjoy recreation within it".*

## Identifying the preferred corridors

2.2.8 The routeing of the overhead lines is inherently interlinked with the siting of the substations, with the findings in relation to one informing the other at all stages of the process. The methodology for line routeing and substation siting for the DGSR Project comprises a number of broadly sequential steps and is outlined in Figure 2.2. The findings of each step inform the next step, building up an ever increasing level of understanding throughout the process. The outcome of each step is subject to a technical and, where relevant, consultation 'check' to ensure that SPEN and key stakeholders are confident with the findings before starting the next step.

**Figure 2.2 Overview of routeing methodology**



2.2.9 The first round of consultation provides the 'check' for steps A to D in the methodology, regarding the identification of 'preferred corridors' and 'preferred substation siting areas' for the DGSR Project.

2.2.10 Once the feedback has been evaluated, the preferred corridors and preferred substation siting areas will be further reviewed by SPEN. Subject to any revisions which require further interim consultation, these areas will be confirmed as 'proposed corridors' and 'proposed substation siting areas' for progression to the next stage.

2.2.11 The next stage of the process, steps E to G, will culminate in the identification of the 'preferred route' for the overhead line and, where required, the 'preferred substation site' for each part of the DGSR Project. These will be taken forward for the second round of stakeholder and public consultation.

2.2.12 Further information on all aspects of the project including the need case, strategic options, SPEN's approach to routeing and siting major transmission infrastructure and the routeing and consultation methodology for the DGSR Project can be found in the following documents, all of which are available to download from the project website www.spendgsr.co.uk:

***Background to Need Case*** – explains why the DGSR Project is needed and the strategic options considered.

***Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment*** – explains how SPEN goes about developing proposals for major projects, and its guiding principles.

***DGSR Project Routeing and Consultation Document*** – sets out SPEN's objective, approach and methodology for the identification and appraisal of the corridors and siting area options.

# 3. The first round of consultation

## 3.1 Overview

3.1.1 SPEN attaches great importance to the effect that its work may have on the environment and on local communities. In seeking to bring forward proposals which cause, on balance, the 'least disturbance' to people and the environment, SPEN is keen to engage with key stakeholders including local communities and others who may have an interest in the project.

3.1.2 In order to achieve this, SPEN aims to ensure effective, inclusive and meaningful engagement with the local community, statutory consultees and other interested parties. SPEN is committed to engaging with those communities affected by its activities in effective and meaningful consultation, as reflected in its *General Corporate Social Responsibility Policy* and its document *Major Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment*, as previously discussed in section 1.3.

3.1.3 SPEN anticipates that the consultation process for the DGSR Project will consist of four main rounds:

- First round (non-statutory) – Preferred corridors and substation siting areas consultation;
- Second round (non-statutory) – Preferred route and substation sites consultation;
- Third round (non-statutory) – Detailed design consultation; and
- Fourth round (statutory) – Pre-application consultation.

3.1.4 This section of the report sets out the legislative process with regard to consultation, details of pre-consultation stakeholder engagement conducted by SPEN, the development of SPEN's consultation strategy, the activities undertaken during the first round of consultation, and the range of people and organisations consulted.

## 3.2 Consenting legislation and guidance

3.2.1 The DGSR Project is subject to different consenting requirements in Scotland and in England.

3.2.2 In Scotland, the project is classed as National Development, as defined in the third National Planning Framework (NPF3) which was laid in the Scottish Parliament on June 23, 2014. SPEN will be required to apply to the Scottish Ministers for consent under section 37 of the *Electricity Act 1989*, to install, and keep installed, the overhead electricity lines. At the same time, SPEN will need to apply for deemed planning permission for the electricity lines, and proposed substation work, under section 57(2) of the *Town and Country Planning (Scotland) Act 1997*.

3.2.3 For the parts of the DGSR Project in Scotland, SPEN is required to comply with publicity and consultation requirements on the proposal under *The Electricity (Applications for Consent) Regulations 1990 as amended* and *The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000 as amended*. Scottish Government expects applicants for section 37 consent to apply by analogy the requirements for pre-application consultation which exist for applications made under the *Town and Country Planning (Scotland) Act 1997*.

3.2.4 Guidance on this process is outlined in the *Scottish Government Energy Consents and Deployment Unit's Good Practice Guidance (January 2013)*.

3.2.5 In England, the proposed work between the border and Harker will be a Nationally Significant Infrastructure Project (NSIP) as defined under the *Planning Act 2008*. As stated above, this requires SPEN to make a Development Consent Order (DCO) application to the Planning Inspectorate upon which the Secretary of State will make the final decision.

3.2.6 For the parts of the project in England, SPEN is required to undertake consultation on the proposal under the *Planning Act 2008*.

3.2.7 Guidance on this process is outlined in the *Department for Communities and Local Government (DCLG) Planning Act 2008: Guidance on Pre-Application Consultation (March 2015).*

3.2.8 For the DGSR Project, SPEN's aim was to devise a unified consultation strategy to meet the requirements of both consenting regimes and which promotes good practice.

3.2.9 At each stage of the project, consultation responses will be considered and previous decisions reconsidered and back-checked to determine if SPEN's decisions are still appropriate.

### Statement of Community Consultation (SoCC)

3.2.10 In England, the *Planning Act 2008* places a requirement on a developer of Nationally Significant Infrastructure Projects (NSIPs) to consult with interested parties including the public, local authorities and statutory bodies regarding any proposed application. As part of these requirements a developer is required to produce a Statement of Community Consultation (SoCC), which sets out its approach to the statutory phase of consultation on its detailed plans. SPEN's DGSR Project is currently at the first round of non-statutory consultation. If it proceeds with its preferred option of an overhead line, the formal application for the new transmission connection between the border and Harker would be made under the *Planning Act 2008* and would require a SoCC, which would be developed in discussion with the local authorities in due course.

3.2.11 There is no requirement for a SoCC in Scotland.

3.2.12 For its first round of non-statutory consultation SPEN discussed its consultation strategy in advance with statutory stakeholders.

## 3.3 Pre-consultation stakeholder engagement

3.3.1 SPEN considered it important to engage with statutory and non-statutory consultees at an early stage in the development of the DGSR Project.

3.3.2 When the project started in 2014 SPEN formed a Statutory Stakeholder Liaison Group (SSLG), to which all of the project's statutory stakeholders from both Scotland and England are invited. The main aim of this group is to ensure good lines of communication with statutory consultees and to discuss the key planning, landscape and environmental matters relating to the project. This group is chaired by the Scottish Government and aims to meet on a regular basis throughout the lifetime of the project. Before the first round of consultation, a meeting of the SSLG was held to inform the routeing methodology and the consultation strategy.

3.3.3 Membership of the SSLG may change with the addition of more participants as the project progresses. The Terms of Reference for this group can be found in Appendix I. Below is a list of SSLG members prior to the start of the first round of consultation:

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

3.3.4 Building on this stakeholder engagement, SPEN ensures that relationships with relevant local authorities and statutory consultees remain strong by maintaining good lines of communication. This is an ongoing process which influences and shapes SPEN's approach to the project and to consultation.

3.3.5 SPEN considers the information received from the local authorities to be vital in shaping its overall approach to consultation. SPEN has worked, and continues to work, with South Ayrshire Council, Dumfries and Galloway Council, Cumbria County Council and Carlisle City Council to ensure that they are kept fully informed. In addition to this, public feedback on the consultation strategy will be used to shape SPEN's approach to future rounds of non-statutory and statutory consultation.

## 3.4 The consultation strategy

3.4.1 The activities in the first round of consultation were intended to ensure that people:

- Had access to project information;
- Were able to put forward their own views and feel confident that there was a process in place for considering any issues raised;
- Played an active role in developing SPEN's proposals;
- Could comment on and influence proposals; and
- Received responses and were informed about progress and outcomes.

3.4.2 In accordance with guidance, and informed by discussions with the relevant local planning authorities through the SSLG, SPEN undertook to employ a range of methods and techniques to ensure as many sections of the community were involved as possible during first round of consultation.

### Consultation zones

3.4.3 To ensure residents closest to the proposals were consulted directly, SPEN defined consultation zones which included all residential and business addresses within the preferred corridors, preferred substation siting areas and areas close to them. The consultation zone was defined as an area generally extending to a kilometre either side of the preferred corridors.

3.4.4 Adjustments were made to the consultation zone in a number of discrete areas to further ensure engagement was not divisive or inappropriate. These are summarised below.

- Extensions to the zone – where the boundary of the consultation zone bisected a defined community or settlement, the zone was extended at that point to include the entire community. As a result of this, the following communities were included in the consultation zone in their entirety: Newton Stewart, Kirkcudbright and Rockcliffe; and
- Contractions to the zone – at the far eastern end of the project, the preferred corridors end at the northern edge of the M6, before reaching Carlisle. Due to the natural visual barrier provided by the M6, it was decided not to extend the consultation zone beyond the preferred corridors at this point.

3.4.5 The consultation zones are described below and shown in Appendix J. The sixth zone was subdivided at the border to enable comments relating to the section of the project in England to be collected and reported on separately if required.

- **Zone 1:** Auchencrosh to Newton Stewart, including substation siting areas A3 and NS5;
- **Zone 2:** Newton Stewart to Glenlee, including substation siting areas NS5 and G2;
- **Zone 3:** Glenlee to Tongland, including substation siting area G2;
- **Zone 4:** Glenlee to Kendoon, including substation siting area G2;
- **Zone 5:** Glenlee to Dumfries, including substation siting areas G2 and D4;
- **Zone 6a:** Dumfries to the border with England, including substation siting area D4;
- **Zone 6b:** Border to Harker, including substation siting area H1.

3.4.6 The consultation zones were used to define areas for direct mailing of consultation literature and to make commenting easier. However they were not restrictive. Any member of the public was encouraged to participate in the consultation, attend an exhibition or make a comment using one of the channels established for the purpose.

## 3.5 The first round of consultation

3.5.1 On 8 June 2015, SPEN publicly launched its first round of non-statutory consultation, which was originally scheduled to run for seven weeks until 24 July 2015. As a result of feedback during the consultation period, a decision was taken to extend the consultation by a further five weeks until 31 August 2015, bringing the total duration of the first round of consultation to twelve weeks.

3.5.2 In the first round of consultation SPEN asked the public for its opinions on the preferred corridors and preferred siting areas for the four substations for the DGSR Project. The objectives of the first round of consultation were to:

- Explain the background and need case for the project;
- Explain the process SPEN has used to identify its preferred corridors and siting areas and demonstrate why it believes this is the most appropriate option based upon engineering, environmental, economic and community considerations;
- Invite the views of statutory and non-statutory consultees, other bodies, the public and local communities about the proposed work and, specifically, views on SPEN's preferred options; and
- Gather views on the preferred corridors and siting areas, together with any other information stakeholders and the public felt SPEN should take into account.

3.5.3 A range of official communications channels were established to answer queries. These were also used to collect the feedback. These were:

- A dedicated free phone number: 0800 157 7353;
- A dedicated project email address, dgsr@communityrelations.co.uk; and
- A FREEPOST address, FREEPOST SPEN DGSR.

3.5.4 A wide range of materials and activities were also used to share information and invite people to take part.

### Project leaflet

3.5.5 A project leaflet in a clear plastic packaging was posted to all properties in postcodes inside the consultation zone. This mailing included just over 14,000 residents across parts of South Ayrshire, Dumfries and Galloway and Cumbria. It was timed to be received on Monday 25 May 2015, two weeks ahead of the first public exhibition. This launched the first round of consultation for the DGSR Project.

3.5.6 This leaflet was the principal form of direct communication with local communities and provided an overview of the project, including project need and the work undertaken to up to that point with regards to corridor routeing and substation siting. The leaflet showed the preferred corridors and siting areas and described these in terms of the consultation zones, in line with the sections of the DGSR Project outlined in paragraph 3.4.5. A copy of the leaflet can be found in Appendix F.

3.5.7 The project leaflet also explained the consultation process itself, in order to help people provide feedback that was as informed as possible. It did this by explaining the purpose of the consultation together with a summary and map of the preferred corridors and siting areas, and providing clear details of how to take part, where to obtain more information and a full list of exhibitions and information points.

3.5.8 Copies of the leaflet were made available at public information points and on the consultation website. Copies were also sent directly to all political, statutory and non-statutory stakeholders, as well as identified local groups and community organisations.

### Public exhibitions

3.5.9 A total of thirteen public exhibitions and drop-in sessions were held throughout the consultation area at publicly accessible venues and locations. This comprised nine original exhibitions publicised and advertised at the launch of the consultation, one additional exhibition arranged during the consultation period at the request of Dunscore residents and a further three evening drop-in sessions in Torthorwald, Carrutherstown and Ringford at the request of community councils. The locations and dates of all the public exhibitions are detailed in Table 3.1 'List of exhibitions and drop-in events'.

**Table 3.1 List of exhibitions and drop-in events**

| Date and times | Location |
|---|---|
| June 9, 2pm until 8pm | Barrhill Memorial Hall |
| June 10, 2pm until 8pm | New Galloway Town Hall |
| June 11, 2pm until 8pm | McMillan Hall, Newton Stewart |
| June 16, 2pm until 8pm | Cairndale Hotel, Dumfries |
| June 17, 2pm until 8pm | Locharbriggs Community Centre |
| June 18, 2pm until 8pm | Kirkcudbright Community Centre |
| June 23, 2pm until 8pm | Ecclefechan Village Hall |
| June 24, 2pm until 8pm | Hetland Hall Hotel |
| June 25, 2pm until 8pm | Longtown Community Centre |
| July 14, 2pm until 8pm | Dunscore Village Hall |
| August 12, 6pm until 8pm | Torthorwald Hall |
| August 20, 7pm until 9pm | Carrutherstown Village Hall |
| August 24, 4pm until 8pm | Ringford Village Hall |

3.5.10 The nine original public exhibitions ran from 9 to 25 June and were widely publicised through the project website, project leaflet, local newspaper advertising and letters sent directly to stakeholders.

3.5.11 An additional exhibition at Dunscore on 14 July was advertised through letters sent directly to 627 properties within the consultation zone approximately five miles either side of Dunscore village. A poster was also produced for Dunscore Parish Council (Appendix K). An example of a letter used to inform people about the exhibition is included in Appendix L. Publicity for the three drop-in sessions during August was arranged by the community councils who requested the events.

3.5.12 At the public exhibitions and drop-ins, people were able to view SPEN's proposals and talk to the project team. Comprehensive information about the project was made available with reference copies of key project documents and large-scale maps on display. Copies of project leaflets, feedback forms and FREEPOST envelopes were available to take away, together with ancillary information regarding SPEN's other services and a leaflet produced by the Energy Networks Association about electric and magnetic fields (EMFs). Visuals of the banners used at the exhibitions are contained in Appendix M.

3.5.13 SPEN fielded consultation teams for each public exhibition to ensure as many people as possible had the opportunity to engage directly with the project team. The size of the consultation team averaged about 10 individuals depending on the location of the exhibition and the anticipated level of interest.

3.5.14 SPEN ensured the consultation team contained individuals with specialist expertise in key areas including planning, environment, health, construction (including overhead line, underground cable and substation construction) and the consultation process to help ensure as many people as possible received comprehensive answers to their questions.

3.5.15 Although people were encouraged to ask questions and share their views with the team, attendees at the exhibition were advised that consultation feedback was not being taken verbally and were encouraged to submit their formal responses via the official consultation channels.

### Feedback form

3.5.16 A feedback form was developed for stakeholders and the public to provide their comments and formally register their views as part of the first round of consultation. As part of the first round of consultation, the feedback form asked for opinions and information on SPEN's DGSR Project as a whole, the preferred corridors and preferred substation siting areas, the possibility of removing existing overhead lines in some areas and the consultation process itself.

3.5.17 The feedback forms included a combination of 13 open questions and one closed question with space for respondents to communicate views or comments in free text. Copies of the feedback form can be found in Appendix G.

### Project website

3.5.18 The address for the project website is www.spendgsr.co.uk. The website provides comprehensive information about the project, a frequently asked questions section and maps of the consultation zones shown in paragraph 3.4.5. All key project documents, together with lists of exhibitions and information points, printable maps and a printable feedback form are available for downloading from the website.

3.5.19 The website also allowed for online consultation and included a dedicated area where visitors could complete and submit the first round consultation feedback forms. The website was regularly updated throughout the first round of consultation to reflect project updates, such as the extension of the consultation period, and will be continually updated as the project progresses.

3.5.20 During the first round of consultation, from the launch of the website until 1 September 2015, the website received 4,700 visits.

### Media relations

3.5.21 To coincide with the launch of the first round of consultation, a press release (see Appendix N) was issued to the media throughout the project area on Friday 29 May. See Appendix O for a full list of media outlets that received the release.

3.5.22 A further press release was issued to the same media outlets on 17 July to announce the extension of the consultation to 31 August. See Appendix P for a copy of this press release.

### Advertising and other promotion

3.5.23 In promoting the first round of consultation, SPEN placed half-page advertisements in the public notices sections of eight local newspapers during the week commencing Monday 25 May, more than two weeks in advance of the first public exhibition. The newspapers' combined circulation areas covered the entire preferred corridors. See Appendix Q for copies of the adverts, newspapers and circulation dates.

3.5.24 The content of the adverts conformed with the requirements outlined in the *Scottish Government Energy and Consents Deployment Unit Good Practice Guidance* and included the location and description of the project, details as to where further information could be obtained, a statement explaining how and by when persons wishing to make comment to SPEN relating to the project may do so and a statement that comments made to SPEN are not representations to the planning authority.

3.5.25 A free-standing A-board advertising the presence of a live exhibition was also produced for use outside venues on exhibition days and is shown in **Figure 3.1.**

**Figure 3.1 A-board used at events**


3.5.26 An A4 poster was produced for Dunscore Community Council to advertise the additional exhibition, which was arranged at their request. Ten copies of the poster were posted to the parish council on 2 July 2015. A copy of this poster is in Appendix K.

### Inspection copies

3.5.27 Project information folders including a covering letter and inspection copies of the leaflet and key technical documents including the *Background to Need Case, Routeing and Consultation Document* and *Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment*, were made available to view free of charge from 1 June 2015 at the locations listed in Table 3.2 'Locations of public information points'.

**Table 3.2 Locations of public information points**

| |
|---|
| Annan Customer Service Centre |
| Ballantrae Library |
| Cumbria County Council offices |
| Dalry Library |
| Dumfries Planning Office |
| Gretna Library |
| Kirkcudbright Customer Service Centre |
| Lochthorn Library |
| Lockerbie Customer Service Centre |
| Longtown Library |
| Newton Stewart Library |
| Stranraer Planning Office |

### Extension to first round of consultation

3.5.28 Towards the end of July, following requests for more time to consider the project information from several individuals and political stakeholders, SPEN decided to extend the duration of the first round of consultation by an additional five weeks until 31August.

3.5.29 SPEN informed the 14,000 plus residents in the consultation zones of the extension by letter. See Appendix R for a copy of this letter.

3.5.30 As the result of feedback received during the consultation, the letter was sent in an envelope clearly marked 'DGSR Project - Important information enclosed'. See Appendix S for a copy of the envelope.

3.5.31 The project website was updated to reflect the extension of the consultation period, including a NEWS banner mention on the Introduction page.

3.5.32 A further press release was issued to the local media on July 17 to announce the extension of the consultation period. See Appendix P for a copy of this press release. See Appendix O for a full media distribution list.

3.5.33 A new front cover and covering letter together with stickers to attach to the leaflet was posted to all public information points on 17 July.

3.5.34 At the request of Torthorwald, Carrutherstown and Tongland and Ringford community councils three further drop-in exhibitions were held during August, as outlined previously in Table 1. The format of these sessions was the same as the previous public exhibitions, but advertising and publicity was handled by the organising council.

### Close of the first round of consultation

3.5.35 SPEN has listened to people's concerns and representations and believes that this feedback report represents a first step in addressing the issues that were raised during the first round of non-statutory consultation. Chapters 6 to 9 of this report summarise the feedback received.

3.5.36 The first round of non-statutory consultation closed on 31 August 2015. To allow time for the responses to be received, SPEN accepted postal feedback up until 7 September 2015.

## 3.6 Who SPEN consulted

3.6.1 This section describes the various groups of stakeholders that SPEN consulted during its first round of consultation. For a list of organisations in each group see Appendix T. For an example of one of the letters sent to stakeholders at the time of the launch of consultation see Appendix U.

### Local authorities

3.6.2 Local authorities are statutory consultees for the DGSR Project. SPEN approached the following local planning authorities and offered them the opportunity to take part in its first round of consultation:

- South Ayrshire Council
- Dumfries and Galloway Council
- Cumbria County Council
- Carlisle City Council

3.6.3 Consultation and discussions with these authorities has been extensive, regular and is ongoing. This includes meetings held with officers and members.

3.6.4 Prior to the start of consultation, SPEN offered bespoke briefings for local councillors in the four council areas. All but South Ayrshire took up this offer. Cumbria County Council and Carlisle City Council decided to hold a joint presentation for members of their Carlisle area committee, which took place on 29 May 2015 at The Courts in Carlisle. The presentation for Dumfries and Galloway Council elected members took place on 5 June 2015 at the council chamber in Kirkbank, English Street, Dumfries. SPEN also sent all planning authorities a full suite of all the project's key consultation documents.

3.6.5 In line with the launch of the project, local authority members whose constituencies could be affected by the preferred corridors and siting areas, or were due to attend a briefing about the project by SPEN, were sent information about the project by post and email. This included copies of the project leaflet and an invitation to attend the public exhibitions.

### Other statutory consultees

3.6.6 A number of other organisations have been identified as statutory consultees in relation to projects of this nature. These and the local authorities are part of the project's Statutory Stakeholder Liaison Group SSLG as explained in section 3.3. SPEN remained in regular contact with statutory consultees throughout the first round of consultation. Table 3.3 'Meetings with statutory consultees' provides a list of briefings held with statutory consultees during this round of consultation.

**Table 3.3 Meetings with statutory consultees**

| Date and location | Organisation |
|---|---|
| 16/06/2014 Dumfries | Scottish Natural Heritage (with RSPB in attendance) |
| 23/10/2014 Crossmichael | Scottish Natural Heritage (with RSPB in attendance) |
| 13/03/2015 Dumfries | Statutory Stakeholder Liaison Group |
| 29/04/2015 Dumfries | Statutory Stakeholder Liaison Group |
| 29/05/2015 Carlisle | Elected members of Carlisle City Council and Cumbria County Council |
| 5/06/2015 Dumfries | Elected members of Dumfries and Galloway Council |
| 3/07/2015 Dumfries | Forestry Commission Scotland |
| 29/07/2015 Dumfries | Dumfries and Galloway Council |
| 13/08/2015 Newton Stewart | Forestry Commission Scotland |
| 14/08/2015 Dumfries | Scottish Natural Heritage |
| 14/10/2015 Bristol | Planning Inspectorate |
| 28/10/2015 Dumfries | Statutory Stakeholder Liaison Group |
| 02/12/2015 Dumfries | Statutory Stakeholder Liaison Group |

3.6.7 In line with the launch of the project, statutory consultees were sent copies of the four key project consultation documents.

### Community and parish councils

3.6.8 Community and parish councils are also statutory consultees. At the point of the project launch, SPEN sent information to 48 potentially affected community and parish councils about the project by letter and email. This included the project leaflet and invitations for community and parish councillors to attend one of the public exhibitions. A full list of all the community and parish councils contacted is included in Appendix T.

3.6.9 As the first round of consultation progressed, SPEN engaged with several community and parish councillors who directly contacted SPEN, submitted feedback or spoke to a project team member at an exhibition.

3.6.10 Following the launch of the first round of consultation, SPEN conducted briefings with a number of community and parish councils on request. See Table 3.4 'Details of meetings and briefings with community and parish councils' for details of the councils that were briefed. SPEN remains in contact with community and parish councils.

**Table 3.4 Details of meetings and briefings with community and parish councils**

| Date and location | Body |
|---|---|
| 09/07/2015 Balmaclellan | Balmaclellan Community Council |
| 13/07/2015 New Galloway | The Royal Burgh of New Galloway and Kells Parish |
| 13/07/2015 Kirkandrews Moat | Kirkandrews on Esk Parish Council |
| 14/07/2015 Dunscore | Public exhibition at the request of Dunscore Community Council. |
| 16/07/2015 | A member of Kirkmahoe Community Council attended the public exhibition at Locharbriggs on 17 June. Following further correspondence, the council requested attendance at its meeting on 16 July. Unfortunately key members of the project team were not available and no further dates were offered by the council |
| 12/08/2015 Torthorwald | Torthorwald and Collin Community Council |
| 20/08/2015 Carrutherstown | Dalton and Carrutherstown Community Council |
| 24/08/2015 Ringford | Tongland and Ringford Community Council |
| 22/10/2015 Challoch | Cree Valley Community Council (with the Diocese of Glasgow and Galloway) |

### Non-statutory consultees

3.6.11 In line with the launch of the project, SPEN sent 10 key non-statutory consultees information about the project including CD copies of all the key project consultation documents outlined in paragraph 3.5.28.

3.6.12 A further 36 non-statutory consultees were sent information about the project by letter and email. This included the project leaflet and invitations to attend one of the public exhibitions. A full list of all non-statutory consultees who received information is included in Appendix T.

3.6.13 Following the launch of the first round of consultation, SPEN conducted briefings with a number of non-statutory consultees on request. See Table 3.5 'Details of meetings and briefings with non-statutory consultees' for details. SPEN remains in contact with these organisations.

**Table 3.5 Details of meetings and briefings with non-statutory consultees**

| Date | Body |
|---|---|
| 16/06/2014 Dumfries | RSPB (with Scottish Natural Heritage) |
| 23/10/2014 Crossmichael | RSPB (with Scottish Natural Heritage) |
| 30/07/2015 Caerlaverock | Wildfowl and Wetlands Trust |
| 12/08/2015 Dumfries | Galloway and Southern Ayrshire Biosphere |

### Local interest organisations and groups

3.6.14 In line with the launch of the project, SPEN sent information about the project by letter and email to 19 local interest groups and other organisations representing community interests. This included the project leaflet and invitations to attend one of the public exhibitions. A full list of local interest groups and organisations who received information is included in Appendix T.

3.6.15 Following the launch of the first round of consultation, SPEN conducted briefings with a number of local interest organisations and groups on request. See Table 3.6 'Details of meetings and briefings with other organisations, held at their request' for details. SPEN remains in contact with these organisations.

**Table 3.6 Details of meetings and briefings with other organisations, held at their request.**

| Date | Body |
|---|---|
| 7/10/2015 | Alan Jones representing Dumgal Against Pylons (ad hoc meeting) |
| 15/10/2015 Mossdale | The Mossdale Community Group |
| 22/10/2015 Challoch | Diocese of Glasgow and Galloway and Cree Valley Community Council |

3.6.16 Other interest organisations or groups which came forward after the launch of the consultation have been added to the project's stakeholder database for engagement in future rounds of consultation.

### Local Members of Parliament (MPs) and Members of the Scottish Parliament (MSPs)

3.6.17 Due to the potential for the then sitting MPs to change at the UK General Election on 7 May 2015, it was decided to wait until new MPs had taken office before offering advance briefings on the project. For consistency MSPs were approached at the same time.

3.6.18 Letters and emails including project information and offering personal briefings were sent to the 15 MPs and MSPs whose constituencies could be affected by the preferred corridors or siting areas. They can be found in the list of stakeholders consulted as included in Appendix T.

3.6.19 MPs and MSPs who requested a briefing on the project, and the dates and location of the briefings carried out, are listed in Table 3.7 'MP and MSP briefings'. SPEN remains in regular contact with these representatives.

**Table 3.7 MP and MSP briefings**

| Date/Location | Member/s |
|---|---|
| 04/06/2015 Edinburgh | Elaine Murray MSP |
| 15/06/2015 Glasgow | Joan McAlpine MSP |
| 30/07/2015 Castle Douglas | Alex Fergusson MP and Cllrs Finlay Carson and Gill Dykes |
| 28/08/2015 by phone | Chic Brodie MSP |
| 2/10/2015 Dumfries | Aileen McLeod MSP |
| 5/10/2015 Dumfries | Elaine Murray MSP |
| 7/10/2015 Dumfries | Richard Arkless MP |
| 16/10/2015 SNP Conference | Joan McAlpine MSP and Richard Arkless MP |
| 21/11/2015 London | Rory Stewart MP and David Mundell MP |
| 29/10/2015 Edinburgh | Graeme Pearson MSP |

### Local communities and members of the public

3.6.20 People living within the consultation zones described in 3.4.5 were communicated with directly about the launch of the first round of consultation. Each received a copy of the project leaflet to their home address, which was identified using postcode mapping. As outlined in paragraphs 3.5.5 to 3.5.8, the project leaflet also invited people to attend a project exhibition and gave details about how to access more information via the project website or at a local information point.

3.6.21 The wider general population in South Ayrshire, Dumfries and Galloway and northern Cumbria was informed about the consultation using advertisements in the public notices sections of local newspapers, as described in paragraphs 3.5.24 and 3.5.25, as well as using press releases which resulted in a number of press and broadcast news items.

# 4. Process for managing responses

## 4.1 Mechanisms for feedback

4.1.1 An official feedback form was developed for respondents to formally register their views as part of the first round of non-statutory consultation. Copies of the feedback form can be found in Appendix G.

4.1.2 The feedback form was also provided online at the project website www.spendgsr.co.uk.

4.1.3 The project leaflet and website provided further information to help people provide feedback that was as informed as possible. Copies of the project leaflet can be found at Appendix F.

4.1.4 The feedback form contained a series of questions that sought views on the following:

- The project as a whole;
- The possibility of removing overhead lines in some places;
- The preferred corridors in sections from west to east;
- The substation siting areas; and
- The consultation process itself.

4.1.5 Representations were received from the public and local community organisations as well as statutory and non-statutory consultees, including elected representatives. Due to the vast variation in the amount and detail contained in individual responses, there is a need for clear presentation and ease of reference. For the purpose of this feedback report, comments have been broadly summarised into themes and issues and are presented in Chapters 6 to 9. Further detail on feedback from specific stakeholder groups is contained in Appendices A to E.

4.1.6 Chapter 3 of this feedback report describes the methods of engagement used during the first round of consultation. There were a number of mechanisms by which responses to SPEN's proposals could be given to the project team during the consultation period. These included:

- Emails to the dedicated project email address;
- Completing the feedback forms, copies of which are available in Appendix G. The feedback form and the project leaflet (Appendix F), which provided information on completing the form, were available at the public exhibitions and could be handed in at events or returned later using the project freepost address. The feedback forms could also be completed and submitted online;
- Letters submitted via the freepost address; and
- In discussion with a member of the project team, but only where this was the only appropriate mechanism for capturing an individual's feedback due to exceptional circumstances. Members of the public were discouraged from leaving verbal feedback either at exhibitions or by phone in order to minimise errors due to possible misinterpretation.

## 4.2 Processing responses and correspondence

4.2.1 Responses to the first round of consultation were received in two main formats, those that responded to the questions on the feedback forms and those that were received by other mechanisms which included letter or email. As a number of the questions on the feedback forms were open-ended and designed to allow for unconstrained comment on the proposals, it was felt that representations received in these separate formats could be analysed together.

4.2.2 A data protection statement informed the respondent that any comment made by them could be made available to certain other bodies for the purposes of the consultation and for creating reports. This included the Scottish Government, the Planning Inspectorate and relevant planning authorities.

4.2.3 SPEN received a wide range of responses to its consultation that included responses to specific questions on the feedback forms, responses that were brief and addressed only a single issue, and responses that were comprehensive, technical and related to a wide range of concerns and issues.

4.2.4 All responses were logged, assessed and processed before being analysed as described in section 4.3.

### Logging procedure

4.2.5 Each consultation response was sent a standard acknowledgement and given a unique identification number.

4.2.6 Where indicated by the respondent, the contact details of those making representations were recorded and used to build a communication database.

### Assessment procedure

4.2.7 All items of feedback were individually assessed to establish whether the correspondent had requested additional specific information in order to further develop their response. Where specifically requested in this way, further information was also sent. In the vast majority of cases, such requests received a substantive response within five working days.

### Processing

4.2.8 Letters and paper feedback forms sent to the freepost address were scanned, filed and the data entered into an analysis database.

4.2.9 Email submissions were filed and entered into the analysis database.

4.2.10 Online feedback forms were exported from the website and imported into the database.

4.2.11 Any further representations received were (and continue to be) recorded and reviewed. SPEN will also continue to re-evaluate decisions in light of any new considerations raised.

## 4.3 Analytical framework

4.3.1 SPEN's approach was to organise and analyse responses and then report on this in a way that enabled the issues raised to be easily understood.

4.3.2 Every individual point, issue or concern was identified and considered. A list of themes emerged against which each comment was recorded and coded. Location specific issues were also identified. The themes are shown in Table 4.1 'Themes for coding responses to the first round of consultation' and have been used to form the basic structure for recording feedback.

**Table 4.1 Themes for coding responses to the first round of consultation**

| Theme | Description |
|---|---|
| Under sea option (B) | Suggestions to put the cable under the sea |
| Consultation and information (CI) | Comments on the consultation process and materials, current and future |
| | Requests for more information about the project |
| Costs (C) | Comments regarding cost of strategic options and other technologies, including suggestions and concerns |
| | Comments about how much should be spent and who pays (e.g. "*cost should be of no concern relative to the environment*", "*SPEN should pick the cheapest option*") |
| | How projects are funded, costs to consumer, general cost benefit analysis, lifetime costs |
| Engineering, design and construction (D) | Comments about the viability of different and emerging technology options, infrastructure, alternative tower design etc. |
| | Comments about local network technicalities, including resilience and connections to renewable sources, current and future |
| | Comments about the construction process, impacts and access to land |
| | Comments on carbon emissions linked to the erection and removal of infrastructure, recycling of materials |

| | |
|---|---|
| | Comments about land suitability, including current and proposed land use, areas used for recreation, water supply, flooding etc. |
| Environment (E) | Comments about the natural and historic environment, including habitats, designated sites |
| Health, safety and security (H) | Comments on health and physical safety (e.g. accident risk, noise, light, EMFs) |
| | Low fly zones |
| Keep to the existing route (K) | Comments about keeping to existing overhead line routes rather than developing new ones |
| Location specific (L) | Comments relating to specific towns, villages and places of interest |
| Policy, principles and need case (N) | Comments on SPEN's approach (e.g. approach to routeing and siting) |
| | Comments on national policy issues, including energy generation |
| | Comments on project need case, condition of assets, capacity and connectivity to other parts of the UK, including Ofgem |
| | Comments on strategic options, how they were identified and SPEN's conclusions, including subsea |
| | Concern about the project leading to more wind farms |
| References to other sources (O) | Documents or sources of information etc. |
| Planning process (P) | Comments on the planning process, including timescales, landowner contact/negotiation and compensation |
| Routeing and siting (R) | Comments about the routeing and siting methodology |
| | Comments and suggestions about specific corridors and siting area options |
| | Alternative and suggested corridors or siting areas |
| | Cumulative effects in relation to other lines and wind farms etc. |

| | |
|---|---|
| Socio-economic (S) | Comments about potential impacts on local economic activity such as tourism, and effect on house values |
| | Other human factors such as stress |
| | The use of land for local recreation or pastimes |
| Taking down existing line (T) | Comments on the removal of existing lines |
| Undergrounding/overhead (U) | Preference for undergrounding, opposition to overhead lines, reasons for undergrounding/overhead |
| Visual impact (V) | Comments about loss of visual amenity, including screening |
| Other (Z) | Other general topics not covered above |

4.3.3 These initial themes were then split into further sub-themes enabling SPEN to understand the broader context of the response. The use of this two-tiered coding framework (themes and codes) assisted the efficient analysis of the representations and assisted further in-depth interrogation of the findings.

4.3.4 Additional codes were used to capture issues in relation to specific corridors.

4.3.5 Each response to the consultation was systematically coded by the SPEN analysis team. This involved the allocation of the relevant sentence or paragraph in each response to the codes described above and the recording of this allocation in an analysis database. A single item of feedback could be allocated to multiple codes to reflect the different issues raised in that response.

## 4.4 Quality assurance

4.4.1 At the collation and analysis stage, SPEN carried out a number of quality assurance procedures. A single senior analyst was used to conduct the analysis to ensure consistent application of the themes and codes. The coding framework itself was regularly reviewed throughout the analysis period with expert input from SPEN's project team.

# 5. Overview of the feedback received in the first round

## 5.1 Representations received

5.1.1 This chapter explains how the responses from the groups outlined in Chapter 3 have been summarised and presented in this report.

5.1.2 During the first round of non-statutory consultation, respondents were asked to comment on three aspects of the proposed overhead line connection between Auchencrosh and Harker. These included:

- Preferred corridors;
- Preferred siting areas for substations; and
- The removal of existing line in some areas.

5.1.3 During the consultation period, 13 exhibitions and drop-in sessions were held from 9 June 2015 to 24 August4 2015. A total of 805 visits were recorded at public consultation events. Appendix V details the number of attendees at each consultation event.

5.1.4 A total of 1,638 representations were received through different response mechanisms.

5.1.5 A total of 793 campaign letters were received in the form of alternative feedback pro formas, drawn up and circulated by members of the community. There were five types. Some featured tick boxes; others were in the form of a circulated list of bullet-pointed statements. All were processed, logged and analysed. The alternative feedback pro formas invited members of the public to support certain statements. With the tick-box pro formas, people ticked the boxes of statements they supported. Where no boxes were ticked, SPEN has assumed the respondent to be in support of all statements on the pro forma. On some pro formas people had written additional comments. All comments and statements have been considered and are addressed within the summaries in this report. Examples of the five pro formas received are contained in Appendix W.

5.1.6 The Mossdale Community Group submitted feedback using a standard detailed letter, 46 copies of which were sent in by individual members of the group. There were also four detailed letters submitted by members of the Zone 5 Landowners Group. These have not been treated as pro formas. Each letter has been assessed separately and any differences in comments recorded and considered.

5.1.7 Two identical petitions were submitted on behalf of residents of Racks Road, Racks Village and Greenlea. There were 144 signatories. The petition's citation has been recorded and analysed as part of the public responses.

5.1.8 Table 5.1 'Representations received between 8 June 2015 and 7 September 2015' identifies the number of representations received through the different response mechanisms.

**Table 5.1 Representations received between 8 June 2015 and 7 September 2015**

| Response type | Count |
|---|---|
| Hard copy feedback forms | 219 |
| Online feedback forms | 206 |
| Alternative pro forma forms | 793 |
| Emails | 208 |
| Letters | 209 |
| Petitions (signatures) | 3 (144) |
| Other | 0 |

5.1.9 Eleven responses received were assessed as null responses. A description of the null response types is below:

- Duplicate - identical copy of feedback already received.

## 5.2 Stakeholder responses

5.2.1 A total of 110 statutory and non-statutory consultees, local interest groups and elected representatives made representations either individually or jointly during the first round of consultation. Dumfries and Galloway Council's representation contained responses from four officers, the Landscape Architect, Biodiversity Officer, and officials from the Countryside and Access section and the Contaminated Land section. Dalton and Carrutherstown Community Council and Dunscore Community Council sent more than one representation.

5.2.2 A total of 34 community councils in Dumfries and Galloway submitted a joint response to the consultation. Seventeen of these also submitted individual responses, as indicated below. In addition, 11 members of the Dumfries and Galloway Scottish Conservative and Unionist Party submitted a joint representation. None of these submitted a separate individual response.

5.2.3 Responses were received from the following stakeholders:

### Statutory consultees:

- Carlisle City Council
- Cumbria County Council
- Dumfries and Galloway Council
- Environment Agency
- Forestry Commission
- Historic England
- Historic Scotland
- Scottish Natural Heritage
- SEPA
- South Ayrshire Council

### Non-statutory consultees:

- The Coal Authority
- Galloway and Southern Ayrshire Biosphere Partnership Board
- John Muir Trust
- Ministry of Defence, Defence Infrastructure Organisation
- Mountaineering Council of Scotland
- The National Trust for Scotland
- RSPB Scotland
- Scottish Water
- Scottish Wildlife Trust
- Scotways
- Transport Scotland
- Wildfowl and Wetland Trust, Caerlaverock
- The Woodland Trust

### Community and Parish Councils:

Italics indicate a council which has signed the joint response,* indicates where a council submitted an individual representation.

- *Arthuret Parish Council (Cumbria)
- **Auldgirth and District Community Council*
- *Borgue Community Council*
- **Brydekirk and District Community Council*
- **Canonbie and District Community Council*
- *Carrutherstown and Dalton Community Council
- *Carsphairn Community Council*
- *Castle Douglas Community Council*
- *Closeburn Community Council*
- **Corsock and Kirkpatrick-Durham Community Council*
- **Cree Valley Community Council*
- *Crossmichael and District Community Council*
- *Cummertrees and Cummertrees West Community Council*
- *Dalbeattie Community Council*
- **Dalry Community Council*
- **Dalton and Carrutherstown Community Council*
- **Dunscore Community Council*
- *Gatehouse of Fleet Community Council*
- *Glencairn Community Council
- *Heathhall Community Council
- **Hoddom and Ecclefechan Community Council*
- *Holywood and Newbridge Community Council
- **Keir Community Council*
- **Kelton Community Council*

- *Kirkandrews on Esk Parish Council (Cumbria)
- *Kirkbean Community Council*
- *Kirkcowan Community Council*
- **Kirkmahoe Community Council*
- *Kirkmaiden Community Council*
- *Kirkpatrick Juxta Community Council*
- *Kirtle and Eaglesfield Community Council*
- *Lochside and Woodlands Community Council*
- **Middlebie and Waterbeck Community Council*
- *New Luce Community Council
- *Parton Community Council*
- *The Royal Burgh of Annan Community Council*
- *The Royal Burgh of Lochmaben and District Community Council*
- *The Royal Burgh of New Galloway & Kells Community Council
- *The Royal Burgh of Whithorn and District Community Council*
- **Ruthwell & Clarencefield Community Council*
- **Tinwald Parish Community Council*
- *Torthorwald Community Council
- *Troqueer Landward Community Council*

### Other local interest groups and organisations:

- Allanton Sanctuary
- Cree Valley Community Woodland Trust
- D&G Outdoor Access Forum
- Diocese of Glasgow & Galloway (Scottish Episcopal Church)
- Dumgal Against Pylons
- Dunscore Parish Church
- Ecclefechan Carlyle Society
- Galloway Fisheries Trust
- GLARE
- Historical and Covenanters Trail Group
- Kirkmahoe Heritage Group
- Newton Stewart and District Angling Association
- Nith District Salmon Fishery Board
- Portrack House and the Garden of Cosmic Speculation
- Roucan Loch Crematorium Company
- Scottish Campaign for National Parks
- St Andrew's Church Parochial Church Council, Kirkandrews-upon-Esk
- The Landmark Trust
- The World Peace Prayer Society
- The Mossdale Community Group
- Zone 5 Landowners Group

### Elected representatives (MEPs, MPs, MSPs and local authority members):

Italics indicate a signatory to the joint submission by members of the Dumfries and Galloway Scottish Conservative and Unionist Party

- *Ian Duncan – Conservative MEP for Scotland*
- *Rt Hon David Mundell – MP for Dumfriesshire, Clydesdale and Tweeddale*
- Richard Arkless – MP for Dumfries and Galloway
- Rory Stewart – MP for Penrith and the Border
- *Rt Hon Alex Fergusson – MSP for Galloway and West Dumfries*
- Adam Ingram – MSP for Carrick, Cumnock and Doon Valley
- Aileen McLeod – MSP for South Scotland
- Claudia Beamish – MSP for South Scotland
- Chic Brodie – MSP for South Scotland
- Elaine Murray – MSP for Dumfriesshire
- Graeme Pearson – MSP for South Scotland
- Jim Hume – MSP for South Scotland
- Joan McAlpine – MSP for South Scotland
- *Cllr Dennis Male – Dumfries and Galloway Council (Annandale East and Eskdale)*
- *Cllr Finlay Carson –Dumfries and Galloway Council (Castle Douglas and Glenkens)*
- *Cllr Gail McGregor –Dumfries and Galloway Council (Annandale North)*
- *Cllr Gill Dykes –Dumfries and Galloway Council (Mid and Upper Nithsdale)*
- *Cllr Graham Nicol – Dumfries and Galloway Council (Mid Galloway)*
- *Cllr Ian Blake – Dumfries and Galloway Council (Abbey)*
- *Cllr Ivor Hyslop – Dumfries and Galloway Council (Lochar)*
- *Cllr Patsy Gilroy – Dumfries and Galloway Council (Dee)*
- Cllr Val Tarbitt – Cumbria County Council

## 5.3 Presentation of responses

5.3.1 Feedback from all respondents to first round of consultation is summarised in this report.

5.3.2 Although SPEN will take into account all representations received, it is not possible to list every single comment in this report. This is in accordance with UK Government guidance on pre-application consultation, which sets out that: *"The consultation report should set out a summary of relevant responses to consultation (but not a complete list of responses)".*

5.3.3 From the 1,638 consultation responses received (including the 793 alternative feedback pro forms) the themes outlined in Table 8 emerged. Summarised representations in these themes have been grouped under the following four headings in subsequent chapters of this report:

- Need case and strategic options, Chapter 6;
- Routeing and siting methodology, Chapter 7;
- Specific zone and area comments, Chapter 8; and
- Consultation and information, Chapter 9.

5.3.4 Although these chapters only include the summarised responses from the consultation, the project team has taken into account all the responses received in full and continues to do so.

5.3.5 For further clarity and transparency, summarised feedback from specific key stakeholders and groups are contained in the appendices as outlined below.

5.3.6 In the case of feedback provided by statutory consultees, a number of non-statutory consultees and MPs and MSPs, many of whom provided expert or issue-specific information, these responses were considered and are reproduced in this report in their entirety in Appendices A, B and E as follows:

- Appendix A shows summaries of responses from individual statutory stakeholders;
- Appendix B shows summaries of responses from individual non-statutory stakeholders; and
- Appendix E shows summaries of formal responses from individual elected members.

5.3.7 Like the responses from members of the public, feedback from community and parish councils and local organisations, bodies and interest groups was more wide-ranging, containing varying levels of detail across a large numbers of issues both general and specific. Their summarised representations have been captured in Chapters 6 to 9. However, their grouped responses have been split out for added clarification and are shown in Appendices C and D as follows:

- Appendix C shows responses from community and parish councils summarised under the same four themed headings as the main report; and
- Appendix D shows responses from local interest groups, bodies and organisations summarised under the same four themed headings as the main report.

## 5.4 Comments received following the close of consultation

5.4.1 The first round of consultation was held between 8 June 2015 and 31 August 2015. SPEN allowed an additional week until 7 September 2015 for the arrival of postal feedback. Representations received after 7 September 2015 up to the publication of this report are considered as 'post consultation feedback'.

5.4.2 SPEN logged, analysed and considered all responses received after 7 September 2015 as part of its wider consideration and analysis of consultation feedback. Because of the very small number of items, all responses received up until the end of October have been included in this report.

5.4.3 Consultation feedback received after 7 September 2015 raised matters/themes which were consistent with consultation feedback already received during the formal consultation period. One detailed item from the Scottish Campaign for National Parks was received, although the majority was submitted by members of the public.

# 6. Summary of comments relating to need case and strategic options

## 6.1 Overview

6.1.1 The following themes emerged in the comments received from the feedback (including the alternative pro formas).

- National and local policy;
- The case for replacing ageing infrastructure;
- The case for increasing transmission capacity;
- The case for improved connectivity for the 'Moyle' interconnector;
- Strategic options (including comments about subsea);
- Embedded generation;
- Undergrounding;
- Refurbishing or upgrading existing infrastructure; and
- Cost.

## 6.2 National and local policy

6.2.1 The topics which are identified under this theme include:

- The project in principle and Government policy;
- DECC's announcement on subsidies;
- Changes in local planning determinations for wind farms; and
- Local vs national benefit.

### The project in principle and Government policy

#### Summary of comments received

6.2.2 Some respondents acknowledged a need for the project in principle; however, others disagreed for a range of reasons which are covered below.

6.2.3 There was a range of views about the Scottish Government's energy policy to achieve 100 per cent electricity demand equivalent from renewables by 2020, which was seen as a key driver.

6.2.4 Comments included:

- A belief that some other countries had abandoned their policy of building wind farms;
- A view that Scotland had enough electricity for its own needs;
- That society should concentrate on reducing consumption;
- That required generation should be more equitably spread across Scottish regions;
- That decisions should be made locally; and
- That decisions on new generation should pay heed to available grid capacity.

### DECC's announcement on subsidies

#### Summary of comments received

6.2.5 A significant number of people pointed to the recent announcement by the UK Government's Department of Energy and Climate Change (DECC) that the Renewables Obligation will be closed to new onshore wind farms from April 2016, and a belief that it rendered the DGSR Project in its current form over-engineered, or premature, or that there should be a moratorium while the situation is reviewed.

### Changes in local planning determinations for wind farms

#### Summary of comments received

6.2.6 Respondents expressed a view that increasing numbers of wind farm applications in Dumfries and Galloway were being refused, for reasons including a lack of suitable sites, landscape capacity, amenity or the fact that the area has reached saturation point. It was suggested that new generation should be encouraged further north, where it was perceived to be less scenic, infrastructure was already in place, and communities were more accepting of wind farm development.

### Local vs national benefit

#### Summary of comments received

6.2.7 There were comments that the project offered little benefit to local people, and that local demand alone did not justify the project. As part of this, respondents felt that Dumfries and Galloway was being used a conduit for the benefit of other regions, particularly England but also possibly Northern Ireland or even Europe.

## 6.3 The case for replacing ageing infrastructure

#### Summary of comments received

6.3.1 There was a feeling that local needs should be the only justification for the project and that these could be served by the current lines with components being upgraded or replaced as necessary.

6.3.2 Some people questioned SPEN's assessment of the condition of the existing lines, and pointed out that there were many older still functioning lines in other parts of Scotland. There was a feeling that SPEN could maintain the existing lines.

## 6.4 The case for increasing transmission capacity

6.4.1 The topics which are identified under this theme include:

- General comments on capacity;
- Changes to energy policy and power station provision;
- UK energy demand;
- Wind turbine efficiency; and
- Pattern of renewable development.

### General comments

#### Summary of comments received

6.4.2 There were comments that the need for additional capacity needed further justification, or should be validated by an independent body. There was an opinion that increased energy efficiency would reduce the need for extra capacity.

6.4.3 There was concern that the increased availability of transmission capacity could encourage more wind farm applications which had previously been constrained.

### Changes to energy policy and power station provision

#### Summary of comments received

6.4.4 Respondents held a view that future developments in energy or planning policy or technology could render the new electricity line unnecessary.

6.4.5 Some felt that recent changes to power station provision would affect the need for the project, with the possible result that more electricity would need to be transported north rather than south.

### UK energy demand

#### Summary of comments received

6.4.6 Some people questioned if demand for electricity from England would be sustained due to factors like England's efforts to reduce consumption, its programme of building new power stations and the current and potentially continuing low price of oil.

### Wind turbine efficiency

#### Summary of comments received

6.4.7 Respondents were concerned that the project did not take account of the lifespan of wind turbines and their decline in efficiency over a number of years. There was also a belief that, due to the intermittent nature of wind, the maximum output from wind farms was rarely achieved. As a result of this, it was felt the project was over-engineered.

### Pattern of renewable development

#### Summary of comments received

6.4.8 In Scotland, some people expressed a belief that most consented wind farms would be in the west of Dumfries and Galloway, with less change in the east of the region. There was a view that the project location should align with the expected new generation or that other options, such as subsea, should be used.

## 6.5 The case for improved connectivity for the 'Moyle' interconnector

#### Summary of comments received

6.5.1 Respondents recognised the need for the 'Moyle' interconnector to operate at maximum technical capacity, but many favoured a subsea link direct to where the electricity is currently needed in the south.

6.5.2 There was a suggestion that the interconnector mostly exported rather than imported electricity.

6.5.3 The long-term viability of the 'Moyle' interconnector was questioned.

## 6.6 Strategic options

6.6.1 The topics which are identified under this theme include:

- General comments on strategic options; and
- Subsea.

### General comments on strategic options

#### Summary of comments received

6.6.2 There was a view that SPEN was moving forward with a proposal for an overhead line solution without having provided sufficient evidence why it was the most appropriate solution.

6.6.3 It was felt that SPEN should have provided detailed assessments of a range of alternative options like subsea or underground cabling, as well as a do nothing or a do minimum option, to provide evidence in support of its strategic decision-making.

6.6.4 Respondents felt SPEN had an obligation to Ofgem to demonstrate it had considered and consulted on alternative options and to be able to justify the costs associated with protecting visual amenities.

6.6.5 There were suggestions for different strategic corridor options north of Dumfries and Galloway:

- There was support for increasing transmission capacity in the former mining areas around New Cumnock, Kelloholm and Sanquhar, where the landscape was perceived to have a higher capacity for overhead line infrastructure, fewer areas of high amenity value and a sparse population;
- There was a suggestion to reinforce the existing 275kV line from Auchencrosh northwards to connect with the new 400kV South West Scotland line, with an extension to the main north-south grid near the M74, possibly through the Thornhill uplands or Lowther Hills;
- It was suggested that a parallel transmission line could be built to the configuration above; and
- A further variation on this theme was to run a corridor towards the A74(M) corridor near Moffat.

### Subsea

#### Summary of comments received

6.6.6 One of the main themes to emerge from the initial round of consultation was the opposition to an overhead line and a desire for a subsea connection. This was due to the perceived landscape, visual, health, heritage, economic and wildlife impacts of an overhead line, and a perception that a subsea connection would avoid this. Several examples were given where subsea cables have been used in other parts of the country and abroad.

6.6.7 It was suggested that a subsea connection could be established from a point on the Solway or Ayrshire coast to where the electricity is needed in England. Various landing sites in Scotland, England and Wales were mentioned.

6.6.8 Some respondents felt a subsea connection would be shorter, thus minimising the transmission losses; safer, due to the lack of 50m high structures in the landscape; less disruptive during construction; and would help avoid the cumulative visual effects of having lines in close proximity to each other in some areas.

6.6.9 Some felt that a subsea link between the 'Moyle' interconnector and England would provide enough capacity to export Dumfries and Galloway's onshore renewable generation as well, or, if not, any extra onshore capacity could be provided by lower voltage cables, which could be installed underground.

6.6.10 There was a suggestion that, if still required, further onshore capacity could be supplied using existing infrastructure in the Kyle Forest/Coylton area and along the M74/A74(M) corridor.

## 6.7 Embedded generation

### Summary of comments received

6.7.1 Some felt locally-based embedded generation such as photovoltaics, or other forms of renewable generation like hydro schemes, could or should be developed to remove the need for large-scale transmission.

## 6.8 Undergrounding

6.8.1 The topics which are identified under this theme include:

- Approach to undergrounding;
- Planning considerations;
- Approach outside UK; and
- Suggested routes for underground cables.

### Approach to undergrounding

### Summary of comments received

6.8.2 There was widespread opposition to overhead line development owing to perceived environmental, landscape and visual, economic and health effects, which it was felt could be alleviated by undergrounding.

6.8.3 There was a belief that undergrounding would help SPEN meet its obligations under Schedule 9 to the *Electricity Act 1989* to "*have regard to desirability of preserving natural beauty*".

6.8.4 There were concerns about delaying a decision on undergrounding until a later stage of the project on the basis that routes which could be made acceptable by undergrounding would have already been discounted.

6.8.5 Respondents suggested that, if a subsea cable was used to provide the bulk of the additional capacity needed, any remaining needs on land could be met by lower voltage cables and that these were easier and less disruptive to install underground.

6.8.6 People felt that any new lines in previously unspoilt areas should be put underground, and where lines were being replaced, the new ones should be put underground as well. Other areas considered suitable for undergrounding included scenic or built-up areas, agricultural land or wherever communities requested it. Some felt existing lines outside the scope of the project should also be considered for undergrounding.

6.8.7 Although acknowledging the disruption caused by installing lines underground, some people felt the land would recover and vegetation grow back, leaving no visual impact in the long term, as with pipelines.

6.8.8 There were concerns that preference for an overhead rather than an underground solution was due to cost and a suggestion that SPEN had financial links with companies that build overhead lines.

6.8.9 It was recognised that there was an additional need to keep underground cables cool, and a suggestion that heat exchange technology could be used for the benefit of the local community.

### Planning considerations

#### Summary of comments received

6.8.10 There were a number of comments that local schemes to place electrical connections underground may have or should have set a planning precedent which the DGSR Project should follow. It was pointed out that *The 2011 Dumfries and Galloway Wind Farm Landscape Capacity Study* recommends that the introduction of any new electricity lines should be avoided and existing and additional electricity supply cables should be placed underground.

6.8.11 There was a belief that the project in its current proposed form would contravene a number of local planning policies, including development in Regional Scenic Areas, and that planning consent would be simpler for an underground cable.

### Approach outside UK

#### Summary of comments received

6.8.12 There was some belief that undergrounding was the chosen option in other countries in Europe, with specific reference to Denmark and Sweden.

6.8.13 Respondents pointed to a recent project for a France-Spain interconnector through the Pyrenees, which was placed underground.

### Suggested routes for underground cables

#### Summary of comments received

6.8.14 It was suggested that cables could be buried under roads. Respondents also felt that SPEN should investigate the option of teaming up with other utilities or highways officials to provide an underground route which also brought benefits like fibre optic broadband.

6.8.15 There was a suggestion that a new underground cable could be constructed along a former railway between Gretna and Stranraer, creating a safe long distance cycle and walking path to link Ireland to the Lake District. It was felt that this solution would help attract tourists and possibly even European funding.

6.8.16 It was suggested that burying an underground cable along the route of an existing gas pipeline might limit damage to the environment and create a SW Scotland Energy Corridor.

## 6.9 Refurbishing or upgrading existing infrastructure

### Summary of comments received

6.9.1 There was a belief among some respondents that that current lines were more than adequate for local needs and should just be upgraded, or are capable of repair when necessary.

6.9.2 There was an opinion that where new lines were to be installed at the same voltage, existing electricity lines should be replaced like-for-like or modernised in situ instead.

6.9.3 People also felt that existing substations should be upgraded or expanded at their current sites, rather than building new ones in entirely unspoilt areas.

## 6.10 Cost

6.10.1 The topics which are identified under this theme include:

- General;
- Lifetime costs;
- Cost-benefit analysis;
- Cost to consumers;
- Sources of funding for mitigation measures; and
- Recompense for communities and landowners.

### General

### Summary of comments received

6.10.2 There was a belief that the decision to pursue an overhead line route was due to cost, at the expense of local communities.

6.10.3 Respondents felt SPEN should have provided cost breakdowns of all strategic options, as well as other solutions, such as underground cables, embedded generation, storage or reducing energy consumption. There was some belief that undergrounding could be an easier and cheaper alternative, or that the cost of installing underground cables would go down if the technology were used increasingly as the norm.

6.10.4 It was likewise felt that SPEN should have provided the costs associated with building a new line in a preferred corridor against upgrading the existing line.

6.10.5 There were questions about how the project would be funded, whether the UK or Scottish governments contributed to the cost, and, if so, by how much. There was a request for SPEN to explain how it would benefit from the scheme financially.

6.10.6 It suggested that SPEN had failed in its Schedule 9 duties under the *Electricity Act 1989* to make sure the project is economically viable, including an assessment of voluntary wayleaves vs compulsory purchase.

### Lifetime costs

#### Summary of comments received

6.10.7 Respondents felt SPEN should consider the lifetime costs in its appraisal of each option, including maintenance costs.

### Cost-benefit analysis

#### Summary of comments received

6.10.8 Respondents suggested that a thorough cost-benefit analysis should have been carried out including impacts such as landscape character, residential amenity, loss of property values, tourism, jobs, wildlife, cultural and historic assets and emissions abatement, as well as the potential savings through avoiding widespread objections to an overhead scheme.

### Cost to consumers

#### Summary of comments received

6.10.9 It was suggested that, on a GB-wide basis, the actual additional cost of a subsea or underground connection would not be significant for annual household electricity bills and that there was evidence that consumers would be willing to pay. Reference was made to *Willingness to Pay* research carried out by National Grid.

6.10.10 Respondents asked whether the additional money on bills would be spread out among Scottish electricity consumers or those across the whole of the UK.

### Sources of funding for mitigation measures

#### Summary of comments received

6.10.11 Respondents suggested several sources of funding for additional mitigation measures such as Scottish Power profits, money saved from wind farm subsidies and money saved by reducing the significant value of constraint payments made by National Grid to generation companies whose output is restricted due to lack of transmission capacity.

6.10.12 There was a belief that Ofgem had a fund in place to allow companies like SPEN to put cables underground, specifically in scenic or built-up areas, and this mechanism should be used here. There was a view that Ofgem "generally accepts" such requests from transmission companies.

### Recompense for communities and landowners

#### Summary of comments received

6.10.13 There was a feeling that although landowners would be a vital part of the development process they would not share the same rewards as those given to participants in wind farm projects.

6.10.14 There was a suggestion that SPEN would save money on wayleaves by choosing corridors in less populated areas.

6.10.15 There was a suggestion that SPEN establish community benefit schemes, similar to those created by wind farm companies.

# 7. Summary of comments relating to routeing and siting

## 7.1 Overview

7.1.1 The following themes emerged in the comments received from the feedback (including the alternative pro formas).

- Routeing methodology;
- Environmental impacts;
- Landscape and amenity;
- Socio-economic impacts;
- Health, safety and security;
- Engineering, design and construction; and
- Line removal.

## 7.2 Routeing methodology

7.2.1 The topics which are identified under this theme include:

- Application of Holford Rules and Horlock Rules;
- General comments on the routeing and siting appraisal;
- Use of trigger zones and buffers;
- Errors and omissions;
- Consideration of individual properties;
- Lack of transparency on route alignments;
- General comments on preferred corridors and siting areas;
- Consideration of corridors containing existing lines; and
- Suggestions for strategic corridors outside the DGSR study area.

### Application of Holford Rules and Horlock Rules

#### Summary of comments received

7.2.2 There were comments that SPEN had taken a considered and detailed approach to identifying and selecting corridors in line with the Holford Rules and the Horlock Rules.

7.2.3 However, there was a counter view that SPEN did not fully comply with the rules, or had not applied them consistently. There was a query about where to find information on a review of the rules which had been conducted by SHETL in 2003.

7.2.4 Some respondents questioned the modern day relevance of the rules, which were first drawn up before large-scale forestry and before wind farms, or how applicable they were to the specific circumstances of the study area.

### General comments on the routeing and siting appraisal

#### Summary of comments received

7.2.5 There were comments that SPEN should have provided more evidence to support the choice of preferred corridors and substation siting areas. There were concerns that unspoilt countryside seemed to be preferred over areas considered to be semi-industrialised. Some felt the impact on all corridors should be judged by an independent body.

7.2.6 There was a view that emphasis had been placed on landscape designations and wildlife, particularly birds, ahead of people.

7.2.7 Some people were unclear why SPEN's initial study area was limited to the centre of Dumfries and Galloway.

7.2.8 Respondents urged SPEN to consider a report titled *Unfinished Business* which backed the creation of new national parks in the Stewartry and surrounding areas of Scotland, which respondents felt rendered the area unsuitable for any industrial structures.

7.2.9 Respondents felt SPEN's approach depended too heavily on desktop assessments rather than field work and information gathered through first hand or local knowledge through consultation. It was felt that SPEN should have engaged with landowners sooner.

### Use of trigger zones and buffers

#### Summary of comments received

7.2.10 Respondents questioned the application of a 10km buffer distance from National Scenic Areas which was felt to be inconsistently applied across the study area. There was a view that this had constrained the possibility of considering more southerly corridors and was not good practice.

7.2.11 Similarly, the use of trigger zones around Special Protection Areas (SPAs) and SSSIs was felt to be inappropriate and outside the scope of the Holford Rules. The use of triggers around Loch Ken and River Dee Marshes Special Protection Areas was perceived to have extended the influence of these SPAs beyond their boundaries at this stage.

7.2.12 There was particular concern about the emphasis given to Regional Scenic Areas (RSAs) at the expense of other scenic places. It was felt that RSAs accommodated telecommunications masts and wind farms and, with careful siting, could accommodate an overhead line.

### Errors and omissions

#### Summary of comments received

7.2.13 A number of perceived errors, omissions or inconsistencies in the *Routeing and Consultation Document* were highlighted. Where of a general nature, these comments are listed in the appropriate sections in this chapter. Matters raised in relation to specific corridors and siting areas are contained within the relevant sections in Chapter 8.

7.2.14 Respondents said key information was lacking, such as the Strategic Environmental Review, technical information in support of the siting area for Glenlee substation, underlying field data in support of *Routeing and Consultation Document* Appendix 4, and copies of all statutory consultee responses to date.

### Consideration of individual properties

#### Summary of comments received

7.2.15 There was concern that locations of existing wayleaves, individual private homes and areas of population had not been mapped in advance of selecting a preferred corridor. It was felt that leaving such mapping until later in the process could result in a less optimal route for local people.

### Lack of transparency on route alignments

#### Summary of comments received

7.2.16 Respondents across all zones were concerned that there was no information about the proposed routes of lines within the corridors, even estimates, stating that it was difficult to comment on such broad geographical areas. There was a feeling that greater detail of routes, heights and visual impact was essential to properly assess the proposal.

7.2.17 Some respondents felt this uncertainty was affecting their ability to make decisions on property investments in the area. There was a comment that SPEN's plans should have been made available to solicitors carrying out land searches when the project was conceived.

### General comments on preferred corridors and siting areas

#### Summary of comments received

7.2.18 Some respondents felt corridors were too narrow in some places, giving fewer options for routeing or minimising visual impact. There was a suggestion that SPEN's routes had already been chosen.

7.2.19 There was a view that corridors should follow existing road or rail routes where available, specifically the M6 and A75, leaving other areas for the benefit of the tourist industry.

7.2.20 There was a general view that overhead lines and substations should be as far from residential properties as possible, with a suggestion that the minimum distance in Russia and other parts of Europe is 1km.

7.2.21 There was a query whether existing substations would be removed in areas where SPEN was proposing new ones.

7.2.22 Specific comments about zones and siting areas are discussed in Chapter 8.

### Consideration of corridors containing existing lines

#### Summary of comments received

7.2.23 Respondents felt that any new overhead lines needed should follow the paths of existing routes as closely as possible. The reasons given were that such areas had already been blighted or industrialised by the presence of overhead lines and that these had become accepted in the landscape, or been mitigated by screening which had been established over decades.

7.2.24 It was felt that SPEN should have presented an alternative proposal following, or largely following, the existing line throughout the region. There was a request why this was not SPEN's standard approach.

7.2.25 Some respondents were willing to accept slight deviations to existing routes to show sensitivity for protected wildlife sites. There was a suggestion that lines could be undergrounded in such areas. However there was some disbelief that new corridors would be better for wildlife. There was a view that people should take precedence over wildlife and that any environmental designations within existing corridors had been granted with the lines already in situ.

7.2.26 There was a view that compared to corridors containing existing lines, the new corridors were not significantly shorter, and in some areas, for instance Cumbria, were significantly longer.

7.2.27 Respondents felt that building a new line in one area while removing another from a different area, was creating double the disturbance. It was suggested that keeping to existing routes would help minimise disruption. There was a suggestion that new lines could be built next to the existing lines before the old ones are removed. Respondents felt this approach would be more acceptable to more people.

7.2.28 Respondents also questioned how building a new line along a completely different route, and removing the old one, would be cheaper or more cost effective than using an existing corridor.

7.2.29 Where people acknowledged that existing lines may no longer be in the best place, respondents felt SPEN had not given enough weight to the fact that they exist. There were comments that SPEN's solution was at odds with National Grid, whose website states: "*National Grid has a policy in place for a number of years which seeks to retain existing assets in situ*".

7.2.30 A number of respondents made reference to the Holford Rules, which require SPEN to consider the effect of following an existing route compared with the effect of a new route avoiding the area.

### Suggestions for strategic corridors outside the DGSR study area

#### Summary of comments received

7.2.31 There were a number of suggestions for corridors outside Dumfries and Galloway:

- In the former mining areas around New Cumnock, Kelloholm and Sanquhar, where respondents perceived landscape had a higher capacity for overhead line infrastructure, fewer areas of high amenity value and a sparse population seen as more welcoming to wind farms and job opportunities;
- By reinforcing the existing 275kV line from Auchencrosh northwards to connect with the new 400kV South West Scotland line, with an extension to the main north-south grid near the M74, possibly through the Thornhill uplands or Lowther Hills;
- A parallel transmission line next to the route described above; and
- A further variation on this theme was to run a corridor towards the A74(M) corridor near Moffat.

## 7.3 Environmental impacts

7.3.1 The topics which are identified under this theme include:

- General environment;
- Sustainability and carbon storage;
- Biodiversity; and
- Treatment of historic and cultural sites.

### General environment

#### Summary of comments received

7.3.2 Respondents expressed general concerns across all zones about the impact of the DGSR Project on the environment, in particular disruption to species and habitats, but also to cultural and built heritage. There was a belief that environmental and landscape concerns had been considered less important than cost.

7.3.3 It was felt that talking to local people and consulting local expertise would have prevented some important aspects of archaeology, ornithology and other significant features being omitted from SPEN's research.

7.3.4 There was a request that existing overhead line removal should be carried out carefully to avoid damage.

7.3.5 There was concern that the status of the region as a UNESCO biosphere reserve was not adequately taken into account and that biosphere transition and buffer areas had been incorrectly conflated into one area.

7.3.6 Respondents favoured avoiding places such as cultural heritage sites, areas of outstanding natural beauty, sites of special scientific interest, designated wildlife sites and listed buildings and structures on the grounds of visual impact.

7.3.7 There was concern whether electric fields could affect the communication of bees.

### Sustainability and carbon storage

#### Summary of comments received

7.3.8 It was felt that peat bog, which could be found in various locations throughout the project area, should be left undisturbed as a natural store of carbon.

7.3.9 There was concern that removing trees to make way for construction would affect the important role of forests in carbon sequestration and the availability of timber for renewable heat purposes, for example biomass boilers.

### Biodiversity

#### Summary of comments received

7.3.10 Respondents were concerned about the impact on habitat networks or red squirrel areas, which could be affected by the preferred corridors.

7.3.11 A number of species were mentioned as requiring special consideration or protection throughout the project area.

7.3.12 There were concerns about the effect of high structures and lines within the flight paths of birds, and deaths due to impact with these structures, especially in poor weather or at night. It was felt that bird deflectors were not effective in poor weather or at night.

7.3.13 There was also concern about the possible impact on falconry as a recreational activity.

7.3.14 There was concern about loss of woodland, particularly ancient woodland. There were particular concerns about the effect of felling trees on the fledging of ospreys along the Galloway Kite Trail. There was also a concern that threatened species of upland, moorland and forest birds would avoid areas during construction and only return slowly, if at all.

7.3.15 Some respondents felt consultees such as Scottish Natural Heritage, the RSPB and Dumfries and Galloway Council had been given undue influence. There was a call for more transparency on the decision-making in this regard. Some people expressed doubt about the danger to bird populations near the Solway posed by the existing line.

7.3.16 There was a comment that while SPEN had apparently done a lot of work understanding the impact on migratory birds in the southern part of the area, this evidence was missing elsewhere.

### Treatment of historic and cultural sites

#### Summary of comments received

7.3.17 While it was acknowledged that SPEN had taken account of Category A listed buildings and certain Scheduled Monuments (SMs) in the assessment of its corridors, respondents felt consideration should have been given to other cultural assets of significant value, and their settings.

7.3.18 There was a feeling that the area's associations with a number of historical and literary figures such as Thomas Carlyle, Robert Burns and the Covenanters, were important and should be taken into account.

7.3.19 It was reported that several important cultural and historic sites, including gardens and designed landscapes, were missing from the documentation.

## 7.4 Landscape and amenity

7.4.1 The topics which are identified under this theme include:

- General;
- Landscape assessments.

### General

#### Summary of comments received

7.4.2 Respondents expressed concern regarding the visual effect associated with towers, overhead lines and substations.

7.4.3 There was a suggestion that SPEN produce a map of the area indicating the visual impact of its proposals in the same way wind farms do.

7.4.4 There was a feeling that SPEN had failed to demonstrate it had met its statutory duties under Schedule 9 to the *Electricity Act 1989* with regards to the visual impact of the line, which state it should "*have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiological features of special interest*".

7.4.5 There were concerns about the cumulative effect of new infrastructure near existing overhead lines. This was particularly the case around the substation siting areas, areas around Dalry, Mouswald and Waterbeck and on the approach to Harker.

7.4.6 In addition, respondents felt that SPEN had not indicated whether lower voltage distribution lines would also need to be connected to the new network or the further potential cumulative visual impact of this.

7.4.7 It was suggested that all new infrastructure should be screened and SPEN was asked to avoid putting towers on Dumfries and Galloway's exceptionally clear skyline, to minimise the visual impact. However there was also a view that the size and scale of the 400kV line was such that trees could not adequately screen it and that only going underground or subsea would offer mitigation.

## Landscape assessments

### Summary of comments received

7.4.8 There was a feeling that only areas designated as having 'highest value' had received protection in SPEN's process, and that sensitive undesignated landscapes were undervalued as a result.

7.4.9 Respondents believed the project would conflict with the *Dumfries and Galloway Local Development Plans* with regard to Regional Scenic Areas (RSAs). There was a further query whether RSAs had featured in the maps in the *Routeing and Consultation Document*.

7.4.10 Respondents asked how landscape capacity data had influenced the choice of preferred corridors, in particular whether the information in the *Dumfries and Galloway Wind Farm Landscape Capacity Study (2011)* had been used.

7.4.11 Respondents questioned SPEN's assessment that corridors through unspoilt areas were preferable in landscape terms to an upgrade of the existing route. It was stated that the relative landscape capacity of the various corridors had been given insufficient weighting in the appraisal of corridor options.

7.4.12 There were concerns that several landscape character types, such as upland fringes and drumlin pastures, were classed as medium capacity when they should have been classed as lower capacity, and hence more sensitive to development. There was specific mention of an area of low landscape capacity type in Kirkmahoe which could not be avoided.

7.4.13 It was further felt that without detailed examination of the length of each landscape type in each corridor, a comparison was difficult to make.

## 7.5 Socio-economic impacts

7.5.1 The topics which are identified under this theme include:

- Tourism;
- Other economic impacts;
- Effect on property values;
- Compensation; and
- Psychological impacts.

### Tourism

#### Summary of comments received

7.5.2 There were widespread concerns that an overhead connection would have a detrimental effect on tourism, which was cited as one of the main sources of income in the area. Respondents felt SPEN had provided inadequate information in its documentation about the value of tourism or the impact of the scheme or visitor numbers.

7.5.3 Respondents highlighted the investment that had been made in branding Dumfries and Galloway as "The Natural Place" and felt that the sight of industrial power lines, particularly in the gateway to the county from the M74, was at odds with this.

7.5.4 There was reference to a recently-completed SPEN project to remove taller electric poles and replace them with more, but shorter, ones. There was a belief this work was carried out in response to a SPEN survey which concluded that visitors felt taller poles provided a detrimental visual impact.

7.5.5 A number of people mentioned specific local events, which they felt were important to the tourist potential of the area, and which could be adversely affected if people were put off visiting the area due to the impact of overhead lines on the environment.

7.5.6 There was specific concern about the viability of tourism accommodation businesses in the vicinity of the project. In several areas, specific confidential economic development was identified which respondents felt could be affected by close proximity of power lines.

### Other economic impacts

#### Summary of comments received

7.5.7 It was suggested that the DGSR Project would have an adverse economic effect on agriculture and forestry, through loss of land, or felling, as well as the shooting and fishing industry. The role of farming and forestry was seen as a particularly important consideration for the area. There was also particular concern over loss of prime agricultural land to the project, with particular reference to loss of availability of prime pasture land during construction.

7.5.8 There was a view that any short-term gain to the local economy from the use of local subcontractors would not translate into long-term economic activity, such as jobs. There were concerns that a "highly specialised workforce" would be brought in rather than creating jobs for local people.

7.5.9 There was some interest among local companies in becoming suppliers to the construction project.

### Effect on property values

#### Summary of comments received

7.5.10 There was a general sense that loss in property value throughout the project area would result in economic decline and that people would move away from the area. A paper by Sally Sims and Peter Dent of Oxford Brookes University was referenced which explores the subject of the impact of towers and overhead lines on property prices, albeit in an urban environment.

7.5.11 Respondents felt that siting infrastructure close to properties would have a detrimental effect on property values, due to its visual impact and perceived health effects. A number of respondents expressed the opinion that this would lead to a loss of quality of life for homeowners in the region.

7.5.12 A number of respondents who had retired to the area said they would not have done so had the project been under way. There were concerns that in the medium to long term there could be a stagnation or reduction in population.

### Compensation

#### Summary of comments received

7.5.13 Respondents felt residents should be compensated for loss of property value and/or loss of visual amenity as a result of the project. Several respondents felt it unfair that landowners would be compensated while householders would not. There were references to other major projects where compensation had been paid, for instance the Borders Railway.

7.5.14 Several respondents felt lack of an estimate by SPEN on the likely compensation arising from claims for injurious affection was an omission meaning the economic viability of the project was not established.

7.5.15 There was a query whether compensation would be available during the disruption caused by work installing and or removing lines, such as at the existing Newton Stewart substation.

### Psychological impacts

#### Summary of comments received

7.5.16 Respondents reported current or likely negative psychological impact due to the proposals or the uncertainty of the process, with expressions of fear, unhappiness, depression, stress-related illness and lost sleep.

## 7.6 Health, safety and security

7.6.1 The topics which are identified under this theme include:

- Health and electric and magnetic fields (EMFs);
- Health and safety during construction and operation;
- Electric and magnetic compatibility;
- Aviation and low fly zones;
- Noise;
- Light;
- Weather; and
- Other potential impacts.

### Health and electric and magnetic fields (EMFs)

#### Summary of comments received

7.6.2 Respondents asked about the perceived health risks relating to Electric and Magnetic Fields (EMFs), which they had heard could be linked to a number of conditions, including childhood leukaemia, cancer and Alzheimer's Disease. There were concerns about living near high voltage infrastructure and long-term exposure to EMFs, and a desire to keep infrastructure away from local communities where possible.

7.6.3 There were specific queries about whether:

- There was any risk posed to children attending a school near overhead power lines, with specific concern about the impact on the viability of child-minding businesses within the preferred corridors;
- It was safe to carry out recreational activities underneath overhead lines;
- EMFs attracted airborne pollutants which could adversely affect the health of people living nearby;
- Having both existing and new lines close to each other would amplify the risk from EMFs; and
- People with epilepsy or with sensitivities to electrical impulses, vibrations and strong magnets should be concerned.

7.6.4 There were requests for SPEN to guarantee there were no health effects for people living near overhead lines or substations.

7.6.5 There was a question about whether EMFs would affect livestock or wildlife, or have implications for the food chain.

7.6.6 Disappointment was expressed that SPEN had not given more reference to EMFs in its project documentation. Respondents requested clear, impartial evidence and information on the studies/research that have been carried out into the issue.

7.6.7 Respondents queried whether placing the connection underground would reduce the potential for negative health effects.

7.6.8 There were concerns that changes to the transmission network elsewhere in Dumfries and Galloway could increase EMFs in existing lines, such as those close to homes in the Georgetown area of Dumfries.

### Health and safety during construction and operation

#### Summary of comments received

7.6.9 Reference was made to the need for close consideration of health and safety of residents during the construction phase of the project.

7.6.10 There was a request for information on the safety of forestry harvesting equipment in the vicinity of overhead lines.

7.6.11 There were specific concerns relating to the proximity of substations to residents and the danger of explosion and fire risk.

### Electric and magnetic compatibility

#### Summary of comments received

7.6.12 Respondents expressed concerns surrounding the potential for equipment such as pacemakers or implantable cardioverter defibrillators (ICDs) to be affected by high voltage equipment.

7.6.13 There was concern from an amateur radio enthusiast that there could be an effect on low frequency waves.

7.6.14 Respondents expressed concerns surrounding the potential for phone equipment, internet reception or signal interference caused by high voltage equipment.

### Aviation and low fly zones

#### Summary of comments received

7.6.15 Respondents expressed concern in relation to preferred corridors and the operations of the RAF and other military and civilian planes. There were a number of references to a Ministry of Defence (MOD) low fly zone across much of the project area, as well as military exercises, and a request that SPEN confirm that National Air Traffic Services (NATS) and the MOD have been consulted.

7.6.16 It was noted that lines near small airfields in Parton and Kirkgunzeon were due for removal and this was felt to be an improvement for flying activities in that area.

### Noise

#### Summary of comments received

7.6.17 Respondents expressed concerns about operational noise during wet or windy weather and the potential for this effect to significantly increase when in close proximity to an overhead connection. There was reference to existing noise levels around Harker substation and particular concern raised for areas where there are currently very low levels of background noise, such as Laggan Burn valley.

7.6.18 To avoid further operational noise, respondents suggested putting cables underground.

7.6.19 People also mentioned increased noise from operational activities such as increased vehicle journeys.

7.6.20 SPEN was asked to provide the level of noise likely to be emitted from each type of tower and from the substations.

7.6.21 Respondents also asked whether potential risks associated with sounds which, although not audible, are detectable by the brain, had been taken into account in respect of establishing a minimum distance to properties.

7.6.22 Respondents queried whether the substations, with particular reference to the one near Dumfries, would be built on vibration-proof foundations to minimise the risk of noise.

### Light

#### Summary of comments received

7.6.23 The possibility of light pollution from substations, or possibly due to a requirement for flashing warning lights on towers for the benefit of low flying planes, was highlighted, with particular reference to the Galloway Forest Dark Sky Park.

7.6.24 There was specific concern voiced on behalf of the residents of Newtown-in-Rockcliffe, where it was felt light pollution from Harker was already intrusive.

### Weather

#### Summary of comments received

7.6.25 There was concern regarding the safety of overhead lines in relation to adverse weather conditions. An area of high winds in excess of 70mph was referenced in an area bordering the B729 between Upper Cluden and Nethergribton Farm.

### Other potential impacts

#### Summary of comments received

7.6.26 Respondents in Zones 6a and 6b expressed concerns that the area could soon be subject to coal mining, leading to fears of subsidence which could affect the project.

7.6.27 There were also concerns about the potential hazards of fishing near to overhead lines, due to the reach of rods and fishing lines.

## 7.7 Engineering, design and construction

7.7.1 The topics which are identified under this theme include:

- Pylon design and technology;
- Resilience, power cuts and effect on distribution network;
- Disruption during construction; and
- Hydrology.

### Pylon design and technology

#### Summary of comments received

7.7.2 There was a feeling that overhead lines and towers were old technology and inefficient. A number of respondents felt SPEN should be investing in innovation to develop new forms of more acceptable and efficient transmission or storage technology.

7.7.3 There were a number of requests for SPEN to consider use of the new T-pylon design, or any other more sympathetic designs which were smaller, or lower, or possibly painted to blend with their surroundings.

7.7.4 A number of people raised concern about the potential risk of weather damage due to the towers' extreme height.

### Resilience, power cuts and effect on distribution network

#### Summary of comments received

7.7.5 Respondents questioned whether the increased resilience of the new network would be felt locally, although some expressed a hope the new line would reduce the number of power cuts they personally experienced. There was also a concern that bird collisions with taller towers could increase power cuts.

7.7.6 There were comments that SPEN had not provided information about any new lower voltage distribution lines which would be required as part of the project.

### Disruption during construction

#### Summary of comments received

7.7.7 There was a general concern about the disturbance, disruption and general inconvenience during the eventual construction of the project, in particular vehicle movements and damage to roads.

7.7.8 A number of respondents commented that, in many of the areas in the preferred corridors, the road network was narrow or single track, in poor repair in places, and was considered unsuitable for construction traffic. There was a feeling that if the project goes ahead SPEN should accept responsibility for restoring roads to a good standard.

7.7.9 Respondents asked whether there would be power outages during the construction of the project.

7.7.10 There were concerns that bridges and traditional roadside houses without foundations would be affected by increased traffic movements. There was a reference to the impact already being experienced as a result of existing forestry traffic.

7.7.11 There was a query whether access to areas of recreation, such as for dog walking, would be affected during or after construction.

7.7.12 It was felt that SPEN should carry out calculations on emissions of greenhouse gases during construction, to include the landscape fabric, soil structure and include manufacture, transportation, civil work and installation of towers, power lines and substations as well as the decommissioning of the existing line.

### Hydrology

#### Summary of comments received

7.7.13 Respondents raised general concerns about the possible effect of construction on water quality in rivers and on sources of drinking water, including a number of private water supplies.

7.7.14 Some people raised concerns about the impact on geology and soils, in particular the potential loss of valuable peat bogs which store carbon.

## 7.8 Line removal

#### Summary of comments received

7.8.1 Respondents were generally supportive of the removal of overhead lines and felt as many as possible should be taken down.

7.8.2 However, many felt the removal was being presented by SPEN as a "sweetener" for the installation of bigger more obtrusive lines in previously unspoilt areas and that this would encourage "nimbyism".

7.8.3 There was a feeling that the existing lines were preferable to the new ones being proposed by SPEN. A number of respondents stated their belief that they were already accepted in the landscape, which was degraded as a result. Respondents also felt the fact that old lines were in areas designated for wildlife was irrelevant, as the areas had received designation despite the lines being in situ at the time.

7.8.4 There was a view that removing lines in some areas and building new ones in others increased the amount of disruption.

7.8.5 There was a comment that, in some areas in the preferred corridors, existing lines would remain and there would be a new larger line as well, leading to cumulative impact on the landscape and people's visual amenity. Substation siting area D4 was referenced as being in a highly visible area, and therefore at risk of affecting the visual amenity of an area considered as the gateway to Dumfries and Galloway.

7.8.6 There was a desire to see any line removal being carried out carefully to minimise damage and disruption. Respondents urged SPEN to ensure all concrete and substructures would be removed to their full depth before the land is reinstated.

7.8.7 There was some regret expressed over plans to remove the Glenlee to Tongland line, due to it being used as a perch for numerous birds.

# 8. Summary of comments relating to preferred corridor and substation siting areas

## 8.1 Overview

8.1.1 Comments were received in the feedback (including the alternative pro formas) relating to each of the consultation zones and the substation siting areas as below:

- Zone 1;
- Zone 2;
- Zone 3;
- Zone 4;
- Zone 5;
- Zone 6a;
- Zone 6b;
- Substation siting areas near Auchencrosh;
- Substation siting areas near Newton Stewart;
- Substation siting areas near Glenlee;
- Substation siting areas near Dumfries; and
- Harker substation.

8.1.2 In each section, comments have been further grouped under the following headings:

- Comments on SPEN's preferred corridor or siting area in that section;
- Comments on SPEN's alternative corridors or siting areas in that section;
- Suggested modifications to any of the SPEN corridors or siting areas in that section;
- Suggested new corridors or siting areas in that section;
- Suggested line routes or substation sites in that section;
- Comments on environment, landscape and amenity issues in that section;
- Comments on socio-economic issues in that section; and
- Comments on technical issues in that section.

## 8.2 Zone 1

### SPEN's preferred corridor A/NS 2

#### Summary of comments received

8.2.1 There was some support for the choice of preferred corridor A/NS 2, with reference to it being further away from the forest park.

### SPEN's alternative corridors in Zone 1

#### Summary of comments received

8.2.2 There was some support for alternative corridor A/NS 1 due to it being further from B7027, which was considered a popular route for tourists.

### Suggested new corridors in Zone 1

#### Summary of comments received

8.2.3 There was a suggestion that that any new electricity line be placed under a new dual carriageway to Stranraer to open up the area for tourism, business and commerce.

8.2.4 A more direct corridor from Glenlee to Auchencrosh, further north through the forest park, was suggested, to avoid Newton Stewart altogether.

8.2.5 An alternative option further west through the forest, closer to existing wind farms, was suggested. It was perceived that this could minimise connections, allow the use of existing timber haulage roads for construction traffic, enable forest to shield the lines from view and protect the remaining undeveloped area around the road and valleys. There was a belief that this option would bring an overhead line closer to the existing substation, thereby avoiding the need to use the preferred substation siting area at NS5, which was felt to be sensitive.

### Suggestions for line routes in Zone 1

#### Summary of comments received

8.2.6 There was support for keeping any potential routes away from the B7027 which is a well-used cycle and tourist route.

8.2.7 Suggestions included that line routes be south of the A714, as far to the south and west of B7027 as possible, within more sparsely populated areas and within the forest itself. It was further suggested the line could go west of Barrhill, Loch Maberry and the Bladnoch Special Areas of Conservation (SAC) and the Site of Special Scientific Interest (SSSI) designated mosses.

8.2.8 There was a request to avoid the skyline and stay within forested areas as much as possible, to minimise visual impacts and take advantage of the forest tracks for access roads.

8.2.9 There was also support for keeping close to the route of the existing line between the current Newton Stewart substation, over the River Cree and past Minnigaff.

### Environment, landscape and amenity considerations in Zone 1

#### Summary of comments received

8.2.10 There was general objection to overhead lines on the grounds they would adversely affect the area's rural and natural beauty, with particular reference to the Cree Valley. There was a view that any towers visible from the road would have a severe detrimental impact.

8.2.11 There was concern about cumulative effects with wind farm developments, with comments that the eastern part of the corridor should be protected. Reference was made to the recent refusal of wind farms in the area.

8.2.12 Respondents identified flora and fauna requiring consideration, as well as a number of specific areas as being valued for wildlife, habitats, cultural heritage, landscapes and views.

### Socio-economic considerations in Zone 1

#### Summary of comments received

8.2.13 Respondents identified a number of places they considered important for tourism and recreation.

8.2.14 Respondents also informed SPEN of proposed economic activity or development plans in the preferred corridor. For the purposes of the report these are being treated as confidential.

### Technical considerations in Zone 1

#### Summary of comments received

8.2.15 Feedback highlighted a number of issues which respondents believed could have an impact on the engineering, design or construction of the DGSR Project, and should be considered:

- The presence of deep peat and granite in certain areas;
- The unsuitability of certain local roads for construction traffic, such as the B7027 into Glenshalloch Glen;
- Areas at risk of flooding, such as Challoch;
- A number of private water supplies; and
- A number of local river catchments.

## 8.3 Zone 2

### Comments on preferred corridor NS/G 1

#### Summary of comments received

8.3.1 There was support for the preferred corridor NS/G 1 but concern about the visual impact of new larger towers on scenery and the potential impact on tourism.

### Suggested modifications to SPEN corridors in Zone 2

#### Summary of comments received

8.3.2 It was suggested that the corridor could run further north, along the Galloway Estate until the Forestry Commission land, before cutting across the existing line.

### Suggested new corridors in Zone 2

#### Summary of comments received

8.3.3 A route from near Dunkitterick Cottage, south of the A702 by Round Fell to Cairnsmore/Black Craig of Dee, below the skyline was suggested, in order to keep the line out of sight of the visitor centre at Clatteringshaws Loch, to be more direct and to stay west of New Galloway.

8.3.4 There was a further suggestion that a corridor could be re-routed along the A75 from the existing substation site.

### Suggested line routes in Zone 2

#### Summary of comments received

8.3.5 There was support for keeping the new line out of sight of the A712 as much as possible to avoid visual impacts along the route between Newton Stewart and the Galloway Hills and forest park.

8.3.6 There were requests to avoid the area of Bower Drive in Minnigaff.

8.3.7 It was felt the line should stay within commercial forestry and that established routes through the forest should be used to minimise impacts on the environment.

8.3.8 There was also support for following the same route as the original line, or as close to it as possible, to minimise the need to fell areas of forest and to reduce the environmental impact.

### Environment, landscape and amenity considerations in Zone 2

#### Summary of comments received

8.3.9 There was some opposition to the increase in the height of the towers from 132kV to 400kV.

8.3.10 Some felt the area should be a National Park and that all lines should be removed.

8.3.11 Respondents identified a number of specific areas as being valued for wildlife, habitats, cultural heritage, landscapes and views.

8.3.12 There was a specific question about whether Glenmalloch Lodge would be affected or be subjected to a survey.

### Socio-economic considerations in Zone 2

#### Summary of comments received

8.3.13 Respondents identified a number of places they considered important for tourism and recreation.

8.3.14 Respondents also informed SPEN of proposed economic activity or development plans in the preferred corridor. For the purposes of the report these are being treated as confidential.

### Technical considerations in Zone 2

#### Summary of comments received

8.3.15 Feedback highlighted a number of issues which respondents believed could have an impact on the engineering, design or construction of the DGSR Project, and should be considered:

- Areas at risk of flooding, such as around Glenshalloch burn;
- A number of private water supplies; and
- A number of local river catchments.

## 8.4 Zone 3

### SPEN's preferred corridor G/T 2

#### Summary of comments received

8.4.1 There was some support for the proposals in this area and the need for the project, and acknowledgment of the case for removing the existing 132kV line on the basis of providing added protection for birds in areas around Loch Ken.

8.4.2 Some respondents said they disagreed with, felt there wasn't enough justification for or didn't understand the justification for the SPEN preferred corridor G/T 2 in this area when the existing lines were functioning well.

8.4.3 There was concern that the preferred corridor G/T 2 is very narrow in places, which could adversely affect the village community of Mossdale and homes within Laurieston Forest.

8.4.4 There was also concern that the preferred corridor G/T 2 could bring potential line routes too close to the settlement of New Galloway.

### SPEN's alternative corridors in Zone 3

#### Summary of comments received

8.4.5 It was pointed out that corridors G/T 3 and G/T 4 were omitted in Chapter 6 of the *Routeing and Consultation Document*.

8.4.6 There was support for the alternative corridor G/T 4 which includes the existing 132kV line and encouragement for SPEN to maintain this route, or upgrade it. It was noted that the proposed line would be the same capacity as the existing overhead line and a query whether SPEN might have overestimated the need for extra capacity in this area.

8.4.7 There was a feeling that the increase in tower height would be less significant than building a new line in a new area, and that people, the landscape and birds were accustomed to it. There was a belief that the existing line did not affect views from key points on Loch Ken.

8.4.8 It was suggested that replacing the existing route, in G/T 4, would avoid the buffer to the Galloway and Southern Ayrshire Biosphere.

### Suggested modifications to SPEN's corridor/s in Zone 3

#### Summary of comments received

Respondents made a number of suggestions for modifications to corridors in Zone 3:

8.4.9 Some respondents suggested that the preferred corridor should be extended further west or that further consideration should be given to corridor G/T 1. This could include routeing the corridor through Glengap and Laurieston forests and up Cairn Edward Hill, to avoid sensitive areas and visual impact on villagers and tourists.

8.4.10 Variations on the alternative corridor G/T 1 were suggested, taking possible routes through the plantation to the west of Loch Skerrow to south of the White Top of Culreoch, then west to regain the Laurieston Forest plantation north of Loch Whineon. This suggestion included sections of undergrounding.

8.4.11 Deviations from preferred corridor G/T 2 were suggested, in order to hide lines using the forestry plantation, heading west, then south of Stroan Loch and then the plantation north and west of Airie Hill. The corridor would run south from a point south of Bennan Hill, through a dip in the landscape south of Stroan Hill to re-enter the forest plantation. It was suggested that this would provide routeing options within the plantation from north of Tormollan Hill to Ringford or from the same point to rejoin the original preferred corridor north or south of Laurieston. Undergrounding of the line towards the south of the corridor was part of this proposal.

### Suggested new corridors in Zone 3

#### Summary of comments received

8.4.12 It was suggested that the existing route between Dumfries and Tongland could be retained, or moved slightly east, possibly linking it to a route following the route of the A713 north around Hardgate.

### Suggestions for potential line routes in Zone 3

#### Summary of comments received

8.4.13 There was a suggestion that the line should avoid the A762 as much as possible and be carefully routed to avoid skylines.

8.4.14 Some respondents felt that any new line should be placed within the conifer plantation as much as possible to minimise the impact on conservation tourism and property.

8.4.15 There was a suggestion that the route should be well to the west of the corridor, travelling from G2 to Flintock Hill, then Peal Hill, then west for Stroan Loch and into the forest.

8.4.16 There was a suggestion any lines should be to the far west of the preferred corridor, or even further west, with a possible route through conifer plantations between Stroan Bridge and the quarries at Craigelwhan. It was felt this would pass west of Kenick Burn picnic site and have minimal impact on ancient woodland and residential properties. It was also felt to be beneficial to create a cleared ride through the plantations for red species birds (the highest conservation priorities) like nightjar and black grouse.

8.4.17 It was felt that any line should run well below the summit ridge of Cairn Edward Hill, and west of Bennan Hill, so as not to be seen from the Glenkens and Loch Ken, and well east of Stroan Loch, possibly within the forest.

### Environment, landscape and amenity considerations in Zone 3

#### Summary of comments received

8.4.18 It was pointed out that the *Dumfries and Galloway Wind Farm Landscape Capacity Study (2011)* identifies the Laurieston landscape unit as having high and medium sensitivity, which should not be used for wind turbines, and it was felt that this should apply to steel lattice towers as well.

8.4.19 There was concern about the amount of forest that would need to be cleared within the preferred corridor. There was reference to recent clearfelling in the area which meant there was less opportunity for screening.

8.4.20 In this area, it was mentioned that the existing lines and towers were frequently well used by several species of birds. A number of other important flora and fauna were also identified, which respondents felt required consideration.

8.4.21 Respondents identified a number of specific areas as being valued for wildlife, habitats, cultural heritage, landscapes and views.

8.4.22 There was a request for information about the priority SPEN had given to avoiding properties and settlements.

### Socio-economic considerations in Zone 3

#### Summary of comments received

8.4.23 Respondents identified a number of places they considered important for tourism and recreation.

8.4.24 There were concerns for the viability of a local shop.

8.4.25 Respondents also informed SPEN of proposed economic activity or development plans in the preferred corridor. For the purposes of the report these are being treated as confidential.

### Technical considerations in Zone 3

#### Summary of comments received

8.4.26 Feedback highlighted a number of issues which respondents believed could have an impact on the engineering, design or construction of the DGSR Project, and should be considered:

- The unsuitability of certain local roads for construction traffic, such as the Slogarie road;
- Areas at risk of flooding, such as around Holm of Dalry;
- The amount of forest to be cleared, and the health and safety implications for forestry operations close to overhead lines; and
- The presence of mineral deposits at Bargatton Farm.

## 8.5 Zone 4

### SPEN's preferred corridor K/G 1

#### Summary of comments received

8.5.1 There was a view that the preferred corridor K/G 1 was reasonable in broadly following the route of the existing line in this area. There was a feeling that following the existing line as much or as closely as possible would minimise potential impacts in other areas.

### Suggested new corridors in Zone 4

#### Summary of comments received

8.5.2 There was a suggestion to replace the existing line with a single new line to the west into the forest park and out of sight of the A713 and residents.

### Suggestions for line routes in Zone 4

#### Summary of comments received

8.5.3 It was suggested that towers should not be placed on the eastern side of the A713 due to potential visibility above the skyline from both the A713 and the B7000 and possible adverse impact on tourism and amenity.

8.5.4 It was felt that any new lines should avoid the A713 valley and residential properties, particularly built-up areas such as Dalry, and go through forestry where possible.

8.5.5 It was also felt unacceptable, from an environmental perspective, to build a line on the eastern side of the Earlstoun and Carsfad dams, or along the course of the River Ken.

8.5.6 It was suggested that SPEN could take the opportunity to move other sections of existing line further into the park area to the west where it could not so easily be viewed by tourists.

### Environment, landscape and amenity considerations in Zone 4

#### Summary of comments received

8.5.7 There were comments about increased numbers and size of towers near Dalry, New Galloway and Balmaclellan.

8.5.8 There were concerns that there were no plans to remove the existing line in Zone 4, resulting in the possibility of two overhead lines on either side of the same valley. It was suggested that the lines should be rationalised so that only one was needed.

8.5.9 Respondents identified a number of specific areas as being valued for wildlife, habitats, cultural heritage, landscapes and views.

## 8.6 Zone 5

### SPEN's preferred corridor G/D 3

#### Summary of comments received

8.6.1 There was some acceptance for the preferred corridor G/D 3, but the majority of respondents who expressed an opinion objected to it.

8.6.2 Respondents in Tinwald and Balmaclellan were concerned that the preferred corridor was narrow in these areas, making the possibility of lines close to their villages more likely.

8.6.3 It was queried why preferred corridor G/D 3 encroaches into Regional Scenic Areas, particularly in places where it appeared to be avoidable, and whether lines would be placed underground as a result. There was a feeling that SPEN should also have considered the impact near to RSAs. An example was given of a wind farm at Tebay which was refused on grounds of potential impact on the nearby Lake District.

8.6.4 There was a comment that the available area in preferred corridor G/D 3 could be reduced by the turbine layout of a proposed wind farm at Loch Urr. It was further queried whether the need for the DGSR Project would be weakened if proposals for a new wind farm in the Cairn Valley did not go ahead.

8.6.5 There was reference to the need for the presence of Roucan Loch Crematorium to be taken into account.

8.6.6 It was felt that 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.

### SPEN's alternative corridors in Zone 5

#### Summary of comments received

Corridor G/D 1:

8.6.7 There were a number of objections to alternative corridor G/D 1. Respondents believed SPEN had omitted important cultural heritage and archaeological sites and water bodies, and underestimated flood assessment.

8.6.8 There was also a preference for G/D 1 on the basis that it was further from Balmaclellan.

8.6.9 Several respondents had heard anecdotally that corridor G/D 1 would be the second preferred option if the first one failed, and queried whether SPEN would re-consult if this was the case.

Corridors G/D 2 and 4:

8.6.10 There was opposition to alternative corridors G/D 2 and G/D 4.

Corridor G/D 5:

8.6.11 It was suggested that corridor G/D 5 in combination with D South was the most optimal corridor choice as it was the shortest. A belief was also stated that this corridor combination performed better against the Holford Rules, had a higher capacity, and was already compromised by hosting an existing 132kV line.

8.6.12 Corridor section D South around Dumfries was also preferred due to the belief that it would have fewer environmental consequences for migrating birds, and be less affected by quarrying and flooding.

8.6.13 There was a request to keep the preferred corridor away from G/D 5 and the Corsock area in particular.

Corridor G/D 6:

8.6.14 There was some support for alternative corridor G/D 6 on the basis that it follows the route of an existing line near the A75 which was considered to be an industrial corridor. There was also support for corridors G/D 5 and G/D 6 on the basis of being in hills.

8.6.15 It was pointed out that corridor G/D 3 is incorrectly listed as the shortest in part of the appraisal tables.

### Suggested modifications to SPEN corridor/s in Zone 5

#### Summary of comments received

8.6.16 It was suggested that an area of suitable land between preferred corridor G/D 3 and G/D 2 or G/D 4, around Glengaber Burn, should be reassessed for inclusion. It was felt that this area could be preferable due to being less populated and with fewer areas of high amenity vale, cultural heritage features or ancient woodland.

### Suggested new corridors in Zone 5

#### Summary of comments received

Respondents made a number of suggestions for new corridors in Zone 5:

8.6.17 To keep the existing route between Tongland and Dumfries instead of placing an overhead line through an area where there currently isn't one.

8.6.18 A corridor north from New Galloway, north of Moniaive, Touros and Sanquhar and then dropping back down the Nithsdale valley along the route of the A76.

8.6.19 A number of suggestions in the Torthorwald area. One to head east over the hill at Torthorwald to pick up the proposed wind farm in the Hightae before rejoining the preferred corridor further on around Ecclefechan. Another from a substation at Heathhall Industrial Estate straight across to Ecclefechan. However, other respondents favoured the lower lying ground in this area, closer to the A75.

8.6.20 There was a suggestion that the broad valley south of Dardarroch and Snade would be a more appropriate area for an overhead line.

8.6.21 A corridor north of Loch Urr either through Dalmacallan Forest or around the top of it, before turning towards Auldgirth and Ae Forest towards the substation siting area at D4.

8.6.22 A suggestion to use the existing route on the Old Military Road with a substation created at the site of the old ICI chemical works at Cargenbridge.

### Suggestions for line routes in Zone 5

#### Summary of comments received

8.6.23 There were comments that Loch Urr should be avoided altogether on scenic grounds, or that any line in this area should go north of Castramon Hill to protect the properties south of the hill.

8.6.24 There were objections to routes in the Cairn Valley, which it was felt did not have the capacity to accommodate such structures. Similarly, it was felt that the valley of the Laggan Burn could not support a line for a number of reasons, including topography, ancient woodland, the number of properties and the presence of existing overhead line.

8.6.25 There were general requests to position overhead lines away from Dumfries, from villages and built-up areas in general, and also to avoid prime arable land.

8.6.26 There was also a request to keep any new line to the north of the A712, to avoid crossing the road.

8.6.27 Respondents in Kirkton requested that lines be kept away from the conservation village.

8.6.28 There was a request to keep line routeing options towards the north of the preferred corridor.

8.6.29 At Balmaclellan, there were suggestions that any route could go more to the north via Torwilkie Hill and Upper Hardland where there are not so many houses and it would be out of the flight paths of birds.

8.6.30 There was a request for any alignment to be south of Broomdykes Farm, behind the tree line.

### Environment, landscape and amenity considerations in Zone 5

#### Summary of comments received

8.6.31 There were concerns that information about Locharbriggs SSSI may have been omitted by SPEN during its routeing process. It was pointed out that a community of around 36 retirement properties at Courthill was not shown and that Twelve Apostles scheduled monument (SM) only appeared on one of the Dumfries corridors in the *Routeing and Consultation Document*.

8.6.32 There were concerns that lines and towers could cause potential impact injuries or death to migratory birds travelling through this zone.

8.6.33 There was a comment that the narrowness of the preferred corridor in parts of Zone 5 would make it difficult for SPEN to site lines without disruption to wildlife. There was also concern about fragmentation of existing woodland and habitat corridors.

8.6.34 Respondents identified flora and fauna requiring consideration as well as a number of specific areas as being valued for wildlife, habitats, cultural heritage, landscapes and views. There was a specific request for a full assessment of the impact of any development on the setting of Dunscore Church.

### Socio-economic considerations in Zone 5

#### Summary of comments received

8.6.35 Respondents identified a number of places they considered important for tourism and recreation. There was particular reference to the potential impact on fishing and cycling tourism.

8.6.36 Respondents also informed SPEN of proposed economic activity or development plans in the preferred corridor. For the purposes of the report these are being treated as confidential.

### Technical considerations in Zone 5

#### Summary of comments received

8.6.37 Feedback highlighted a number of issues which respondents believed could have an impact on the engineering, design or construction of the DGSR Project, and should be considered:

- Areas of high winds, with particular reference to the B729 between Upper Cluden and Nethergribton Farm;
- The presence of areas of peat bog and marshland, for instance the Isle of Dalton;
- Areas at risk of flooding, such as the Laggan Burn valley and the valley floor between Moniaive and Dunscore, as well as wetland areas providing alleviation for flooding, such as at Lochmailing Lochan and Trees Knowe;
- A number of local river catchments, including the River Nith;
- The presence of the Dumfries aquifer and a number of private water supplies;
- The presence of high pressure gas pipelines, such as at Cowhill and Tinwald;
- Mining and quarrying activities such as near Lochar Burn, Tinwald and Hoddam's Quarry;
- The unsuitability of certain local roads for construction traffic, such as the A712, the B729, due to its popularity with cyclists, and the U391. All roads through the town of Dumfries were also felt to be unsuitable, as well as the Glen road from Knocklearn to Dunscore via Craigenputtock, Letterick, and Sundaywell. The existing impact of quarry traffic around Locharbriggs was highlighted; and
- There was reference to the area having a record of earthquakes, with mention of a recent event near Portrack.

## 8.7 Zone 6a

### SPEN's preferred corridor D/H 1

#### Summary of comments received

8.7.1 There were objections to the preferred corridor D/H 1 in this area, largely on the grounds that it passes through an area which does not have an overhead line at the moment.

8.7.2 It was pointed out that Hartwood Hill wind farm planning application was not noted on the corridor map 7.6c in the *Routeing and Consultation Document*.

### SPEN's alternative corridors in Zone 6a

#### Summary of comments received

8.7.3 There was a preference for the more southerly alternative corridors D/H 3 and D/H 4, closer to the existing overhead line and also to the A75, which was considered by some to be an existing development corridor. These corridors were also considered to be shorter, thereby minimising environmental and amenity impacts, despite being closer to more people.

### Suggested new corridors in Zone 6a

#### Summary of comments received

There were a number of suggestions put forward in Zone 6a:

8.7.4 There was a suggestion to connect the new 400kV line via a direct route avoiding areas of population from the new substation near D4 to an existing 400kV line at a point between Burnswark and Waterbeck. It was felt that this was more convenient for connecting wind farms in the area.

8.7.5 It was suggested that the existing 132kV line from Chapelcross be upgraded.

8.7.6 Another suggestion was to upgrade the line from Annan to Gretna and then to Harker, rather than remove it.

8.7.7 There was some support for a corridor running parallel to the M74 and rail line between Ecclefechan and Harker.

### Suggestions for line routes in Zone 6a

#### Summary of comments received

8.7.8 There was a view that any new 400kV overhead line passing near Chapelknowe should be west of the existing 132kV line to avoid the village altogether.

8.7.9 It was felt that lines should avoid agricultural land as much as possible.

8.7.10 A route to the north of the A75 was suggested, in order that fewer towers would be seen at any one time.

8.7.11 It was suggested that the path of the overhead line should go to the south side of the railway, with opportunities for substation siting in the Lochar Moss area, which was stated to be programmed for clearfelling.

### Environment, landscape and amenity considerations in Zone 6a

#### Summary of comments received

8.7.12 There was a suggestion that hilly landscapes were held in higher regard by many people than flat landscapes.

8.7.13 Respondents queried whether the existing lines were causing problems for wildlife. A view was expressed that SPEN were prioritising wildlife and the environment ahead of the concerns of residents.

8.7.14 On the other hand, there were concerns about the compatibility of overhead lines with a number of important bird species and the potential risk to migratory birds, especially in the dark. There was particular reference to area around the RSPB Caerlaverock reserve in this Zone.

8.7.15 A number of respondents raised concerns about the cumulative effects of new and existing overhead lines in close proximity in respect to visual amenity, with particular reference to Waterbeck, Racks, Chapelknowe and Mouswald.

8.7.16 A number of respondents objected to the idea of increasing the size of the towers in areas where there is already an existing line.

8.7.17 There were concerns about the visual impact of towers in an area of large open valleys, rolling hills and mountains which were perceived to be very vulnerable to large structures. A number of respondents objected to the idea of increasing the size of the towers in areas where there is already an existing line.

8.7.18 Respondents identified flora and fauna requiring consideration as well as a number of specific areas as being valued for wildlife, habitats, cultural heritage, landscapes and views.

8.7.19 There were concerns that a number of listed buildings were omitted from SPEN's documentation, as well as the general impact of the project on an area associated with the Reivers and Thomas Carlyle.

### Socio-economic considerations in Zone 6a

#### Summary of comments received

8.7.20 Respondents identified a number of places they considered important for tourism and recreation.

8.7.21 There was concern about the possible impact on the future development of Hoddom Castle Caravan Park and its potential as an employer. Respondents also informed SPEN of proposed economic activity or development plans in the preferred corridor. For the purposes of the report these are being treated as confidential.

### Technical considerations in Zone 6a

#### Summary of comments received

8.7.22 It was felt that consideration should be given to the impact on communities which had been disrupted by other recent infrastructure developments. Developments mentioned included trunk road development between Carrutherstown and Kinmount and the installation of a 400kV line some years earlier.

8.7.23 Respondents asked how the new 400kV line would get across the M74 motorway and whether it would involve using towers in excess of 60m high.

8.7.24 Feedback highlighted a number of issues which respondents believed could have an impact on the engineering, design or construction of the DGSR Project, and should be considered:

- The area's potential for mining activities, in particular the potential for subsidence;
- The presence of an historic army camp near Middlebie, in particular the potential for undetonated ordnance;
- Areas at risk of flooding, such as around The Water of Milk near Middleshaw, and Ecclefechan Burn; and
- The unsuitability of certain local roads for construction traffic, such as such as the B725 between Ecclefechan and Waterbeck.

## 8.8 Zone 6b

### SPEN's preferred corridor D/H 1

#### Summary of comments received

8.8.1 There were a number of objections to the preferred corridor D/H 1 through Cumbria, with a general preference for the shorter alternatives.

8.8.2 There was a comment that the preferred corridor ran through a very flat landscape between Longtown and Harker. It was felt that this limited the options for minimising the visual impact, especially around Alstonby.

### SPEN's alternative corridors in Zone 6b

#### Summary of comments received

8.8.3 There was a view that D/H 2 or D/H 4 were preferable due to being shorter and already having been compromised visually by a 400kV line, the motorway and the rail line.

8.8.4 There were comments referring to a number of areas which respondents felt SPEN had ruled out but were worthy of further investigation. These included a defence site, an industrial area mistakenly identified as housing and another area currently outlined as a business park.

### Suggested new corridors in Zone 6b

#### Summary of comments received

8.8.5 There was a view that the new route should follow the current route of the existing line, running along the M74/M6 corridor.

8.8.6 It was suggested that an additional 132kV line be run next to the existing route to double up the capacity and blend more readily into the landscape.

### Suggestions for line routes in Zone 6b

#### Summary of comments received

8.8.7 It was requested that any lines be kept closer to the commercial areas of Longtown.

### Environment, landscape and amenity considerations in Zone 6b

#### Summary of comments received

8.8.8 There were concerns about the cumulative effects in Zone 6b, which it was felt was already crowded with transmission lines, gas and ethylene pipelines and proposed wind farms. There was specific reference to existing lines near Newtown which were considered already intrusive.

8.8.9 There was a view that the environmental justification for the preferred corridor was unconvincing.

8.8.10 Respondents identified flora and fauna requiring consideration as well as a number of specific areas as being valued for wildlife, habitats, cultural heritage, landscapes and views, in particular around Kirkandrews Church and Tower.

### Socio-economic considerations in Zone 6b

#### Summary of comments received

8.8.11 There was general concern about loss of good agricultural land.

8.8.12 Respondents identified a number of places they considered important for tourism and recreation.

8.8.13 Respondents also informed SPEN of proposed economic activity or development plans in the preferred corridor. For the purposes of the report these are being treated as confidential.

### Technical considerations in Zone 6b

#### Summary of comments received

8.8.14 There were concerns about the long term impact of construction on farm land due to the extent of land compaction around towers.

## 8.9 Substation siting areas near Auchencrosh

### SPEN's preferred substation siting area A3

#### Summary of comments received

8.9.1 There was a view that the area around A3, specifically around the headstreams of the Water of Tig, the Lig Burn and Farden Hill, should be protected.

### SPEN's alternative siting areas near Auchencrosh

#### Summary of comments received

8.9.2 There was preference for alternative sites A1 and A2, closer to the existing substation, on visual grounds, specifically that it would keep development together.

### Suggestions for substation sites

#### Summary of comments received

8.9.3 There was a suggestion that a substation should be sited away from the A714 and in the forest.

### Environment, landscape and amenity considerations near Auchencrosh

#### Summary of comments received

8.9.4 Respondents expressed a view that the substation should be screened in order to minimise the effects on local people, landscape and tourism in the area.

8.9.5 Respondents identified a number of specific areas as being valued.

## 8.10 Substation siting areas near Newton Stewart

### SPEN's preferred siting area NS5

#### Summary of comments received

8.10.1 There was opposition to the preferred substation siting area NS5. Respondents disagreed with, felt there wasn't sufficient justification for or didn't understand the justification for the preferred siting area at NS5, or why other siting areas had been discounted.

8.10.2 There were concerns that NS5 would have a significant detrimental effect on the built and religious heritage of Challoch, including the setting of All Saints Church and the other listed buildings and features close by. There was a view that any effect on the church or churchyard would be felt over a wide area, because they attract a congregation and visitors from far and wide.

8.10.3 It was felt that NS5 disregarded guidance in the Holford and Horlock Rules, in that it should not have been given preference over other siting areas in industrial zones. There was a view that other siting areas better conformed with guidance.

8.10.4 There was a comment that the preferred siting area was too large and that SPEN should have provided specific siting information.

8.10.5 Respondents expressed a view that the visual impact of NS5 could not be mitigated and urged SPEN to reappraise the siting areas.

8.10.6 There was some support expressed for NS5 but SPEN was urged to use appropriate screening to mitigate its visual impact in an area considered to be scenic.

### SPEN's alternative siting areas near Newton Stewart

#### Summary of comments received

8.10.7 There was support for choosing one of SPEN's alternative substation siting areas. In general, it was believed that the alternative siting areas (NS2, NS3 and NS4), being closer to existing lines, would allow for greater overall line removal and easier connections to Glenluce and other areas. It was also stated that these sites meant the new line coming in from Zone 1 could be more readily hidden in commercial forestry plantations.

8.10.8 The largest number of supportive comments were made for siting area NS3, the existing substation, largely on the basis that it was an established site in an already industrial area. It was felt more consideration should have been given to use, expand or build next to the existing site.

8.10.9 There were also comments in favour of each of siting areas NS2 and NS4, as both were felt to be in a largely accepted industrialised area south of Newton Stewart. In reference to NS2 there was comment that no lines would encroach on Newton Stewart itself. In support of NS4, people felt connectivity to existing lines would be easier as the existing Newton Stewart to Glenluce line passed right through it. There was further belief that it would enable the entire existing line, including around Bower Drive and Kirkland, to be removed.

8.10.10 There was a view that all the alternative sites (other than NS5) were inappropriate due to the size of the proposed substation and topography, access or proximity to residential properties.

### Suggested new siting areas near Newton Stewart

#### Summary of comments received

8.10.11 There were suggestions for alternative siting areas at South Barnkirk Hill, which is surrounded by trees and close to a road, and near Black Hill.

### Suggestions for substation sites

#### Summary of comments received

8.10.12 There were a number of comments that the substation should be sited in a forest, away from public view, away from towns and away from the A75.

8.10.13 It was suggested that the substation itself should be as small as possible and carefully sited so as to require the least amount of new overhead line and towers.

### Environment, landscape and amenity considerations near Newton Stewart

#### Summary of comments received

8.10.14 Respondents identified flora and fauna requiring consideration as well as a number of specific areas as being valued for wildlife, habitats, cultural heritage, landscapes and views.

### Socio-economic considerations near Newton Stewart

#### Summary of comments received

8.10.15 Respondents identified a number of places they considered important for tourism and recreation.

### Technical considerations near Newton Stewart

#### Summary of comments received

8.10.16 Feedback highlighted a number of issues near the preferred siting area which respondents believed could have an impact on the engineering, design or construction of the DGSR Project, and should be considered:

- The unsuitability of local roads for construction traffic, with particular reference to the combined impact of construction traffic in addition to forestry vehicles; and
- Areas at risk of flooding, such as Challoch, and concerns that a substation could exacerbate the situation.

## 8.11 Substation siting areas near Glenlee

### SPEN's preferred siting area G2

#### Summary of comments received

8.11.1 There was some approval for the preferred siting area G2. However, there was also objection to it on the basis of visual amenity and the potential cumulative impact of lines in the Glenkens and near Dalry at this point.

8.11.2 This siting area was felt to be on an exposed area of moorland, highly visible without tree cover. It was suggested this contravened the guidance of Holford Rule 5.

### Suggested new siting areas near Glenlee

#### Summary of comments received

8.11.3 Respondents suggested a substation siting area to the east of Glenlee Hill, which was considered less visible from the busy road, and could avoid the need for a 132kV link back to the existing substation.

8.11.4 Respondents suggested a siting area in Craigubble Wood, which was considered to be less scenically sensitive than G2 and could allow the existing 132kV line to remain as present.

### Environment, landscape and amenity considerations near Glenlee

#### Summary of comments received

8.11.5 Respondents identified a number of specific areas as being valued for wildlife, habitats, cultural heritage, landscapes and views.

## 8.12 Substation siting areas near Dumfries

### SPEN's preferred substation siting area D4

#### Summary of comments received

8.12.1 There was some support for preferred substation siting area D4. However, there was also much opposition to it and SPEN was urged to consider an alternative site.

8.12.2 Some respondents said they disagreed with, felt there wasn't sufficient justification for or didn't understand the justification for the preferred siting area at D4, or why other siting areas had been discounted.

8.12.3 There was a strong feeling that D4 was too close to settlements and properties, in particular Collin, Greenlea and Racks.

8.12.4 A number of respondents felt the siting area was too large to make a comment, without more precise information about where the actual structure would be placed within it.

### SPEN's alternative siting areas near Dumfries

#### Summary of comments received

8.12.5 There were objections to siting area D1 on the grounds of high visual amenity and local roads extensively used by walkers, cyclists and horse riders for recreation. It was pointed out that the boundary indicated by SPEN intersects the Woodlands housing estate.

8.12.6 There was a comment that siting area D2 was inappropriate due to its proximity to a gas installation and gas supply line, as well as several archaeological sites.

8.12.7 There were objections to alternative siting area D3, which it was felt would affect the Lochar Moss and also a nearby conservation area.

### Suggested new siting areas near Dumfries

#### Summary of comments received

8.12.8 There was a view that existing commercial sites should be favoured over greenfield sites. Extending the site of the existing substation in Dumfries on Leafield Road was suggested.

8.12.9 The former nuclear power station site at Chapelcross was suggested on the grounds that it is part of the existing electrical infrastructure. There was also a view that this site would alleviate the need for a new corridor.

8.12.10 Areas close to and including Heathhall Industrial Estate were suggested as new substation siting areas, including an old airfield, an industrial estate off Lockerbie Road and the disused Pines Golf Course.

### Suggestions for substation sites

#### Summary of comments received

8.12.11 There were requests to put the substation to the south of the railway line, an area believed to be programmed for clearfelling.

8.12.12 It was suggested that a specific area between Racks Village and Mouswald, or that placing the substation behind the trees at the neighbouring factory, would be marginally preferable.

8.12.13 It was suggested that the substation be built underground on the basis of visual amenity.

### Environment, landscape and amenity considerations near Dumfries

#### Summary of comments received

8.12.14 There were general concerns about the corridor and substation siting area around Racks and Greenlea on the basis of the cumulative effect of the lines, residential amenity and visual amenity in an area considered to be the "gateway" to Dumfries and Galloway. It was felt careful screening would be required in this area.

8.12.15 Respondents identified a number of specific areas as being valued for wildlife, habitats, cultural heritage, landscapes and views.

8.12.16 Respondents felt there should be a minimum distance from properties.

### Socio-economic considerations near Dumfries

#### Summary of comments received

8.12.17 There were concerns about the possible impact on health and property values.

8.12.18 Respondents in this area were concerned that the substation could be visible from the A75 and the impression this would give visitors entering the region.

8.12.19 Respondents identified a number of places they considered important for tourism and recreation.

8.12.20 The neighbouring Drummuir Ice Cream Farm, which supports nine jobs, was felt to be at severe risk of economic impact.

### Technical considerations near Dumfries

#### Summary of comments received

8.12.21 It was felt the size of the substation, at 28 acres, was too large for the area.

8.12.22 Feedback highlighted a number of issues which respondents believed could have an impact on the engineering, design or construction of the DGSR Project, and should be considered:

- The presence of boggy ground;
- A suggestion that part of the preferred siting area may have been used as a rubbish tip in the past;
- The proximity of the B724 Galloway Tourist Route, a cycle route and bus stop with respect to concerns for health and safety during construction and ongoing operational access;
- The specific unsuitability of Racks Road for construction traffic, with particular reference to existing numbers of large commercial, agricultural and industrial vehicles and pedestrians including school children and people walking to and from the bus stop. SPEN was asked to carry out a detailed traffic survey; and
- There was concern at the size of the proposed substation and the amount of valuable agricultural land that would be lost.

## 8.13 Harker substation

### Summary of comments received

8.13.1 Respondents were aware of National Grid's North West Coast Connections (NWCC) project which would also affect transmission lines near Harker substation. SPEN was asked to provide a complete picture of all the proposals affecting overhead lines around Harker substation, not just its own, but also those owned by other firms, so that people knew what was happening.

8.13.2 There was a query whether Harker substation was at risk of having too much capacity if National Grid's North West Coast Connections project did not go ahead.

8.13.3 There were objections to extending the National Grid substation at Harker based on concerns that existing noise, light pollution and the risks from EMFs might be made worse.

# 9. Summary of comments relating to the consultation process

## 9.1 Overview

9.1.1 The following themes emerged in the comments received from the feedback (including the alternative pro formas).

- General matters relating to the consultation;
- The consultation process;
- Consultation materials; and
- Suggestions for future rounds of consultation.

## 9.2 General matters relating to the consultation

9.2.1 The topics which are identified under this theme include:

- Lack of prior knowledge;
- Meaningfulness of consultation;
- Area of consultation;
- Approach to stakeholders; and
- Level and amount of detail.

### Lack of prior knowledge

#### Summary of comments received

9.2.2 There were a range of responses about the first round of consultation itself. Many respondents commented that they considered the process well-conducted and thorough and welcomed the chance to express their views, while others felt the process inadequate and lacking in information.

9.2.3 Respondents felt they had been taken unaware by the project and that there was not enough notice of the consultation before it started.

9.2.4 There was a feeling that SPEN had been working on the project for several years and by comparison local people had a disproportionately short amount of time to comment. There was a comment that information about the project had not come to light in property searches in 2013.

9.2.5 One respondent referred to a mention of the project in the Scottish Government's Third National Planning Framework (NPF3), which indicated a line further north.

### Meaningfulness of consultation

#### Summary of comments received

9.2.6 Respondents expressed doubt that SPEN would take account of their feedback in its decision making process.

9.2.7 Many felt that SPEN's consultation was too late in the project development and that people should have been given an opportunity previously to influence preliminary strategic options, such as a subsea alternative, as well as the selection of the preferred corridors and preferred siting areas.

9.2.8 There was concern at having been presented with a single preferred corridor or siting area option in a location, rather than a choice of all the alternative corridors and siting areas. It was felt an alternative option, such as undergrounding, might have changed the parameters for assessment.

9.2.9 There were comments that this might be in breach of the *Aarhus Convention on Access to Information, Public Participation in Decision-Making and access to Justice in Environmental Matters* and could be open to legal challenge.

9.2.10 While some respondents acknowledged that this round of consultation was non-statutory, they felt that perceived failings now could not be rectified in future rounds of consultation because fundamental matters would have already been determined. There was a call for the consultation to be re-started from an earlier stage, or for a moratorium.

9.2.11 There were comments that the Strategic Environmental Review of 2013, technical information supporting the choice of site G2, data/workings to support Appendix 4 of the *Routeing and Consultation Document*, and copies of statutory consultee responses should have been included in the project documentation.

9.2.12 Respondents felt a thorough cost-benefit analysis of all the alternative options should have been submitted as part of the project documentation.

### Area of consultation

#### Summary of comments received

9.2.13 There was a feeling that the consultation zone of 1km around the boundaries of the preferred corridors was too small, and that the project had much wider implications for the economy of Dumfries and Galloway than the zone implied. Some commented that the visual impact of the proposed new overhead line and towers would be further than 1km.

9.2.14 There were various suggestions for a more appropriate consultation area including the whole of Dumfries and Galloway, South West Scotland, all of Scotland and visitors. Additional mailings in centres of population outside the corridors such as Dumfries, Lockerbie or Lochmaben were suggested. There was reference to the fact that people outside the area with relatives commemorated in Challoch churchyard had not been given the chance to comment. As a result some people felt there was a lack of wider public awareness about the project.

9.2.15 There was a suggestion that the size of SPEN's consultation zone had minimised the number of objections.

### Approach to stakeholders

#### Summary of comments received

9.2.16 There was a perception that community and parish councils were key representatives of the communities affected by the preferred corridors and had not been integral enough to the consultation process.

9.2.17 Respondents felt that the community and parish councils were not given enough notice, or enough time to assess the information and hold meetings. There were comments that the timing of the consultation, falling partly within the holiday period, had further complicated this due to the fact that most councils are in recess and do not meet.

9.2.18 There were comments that community and parish councils should have been provided with hard copies of project documentation free of charge. There was also concern that there was a charge for copies of the project documents for people.

9.2.19 Respondents felt SPEN needed to work more closely with the local community at grass roots level and involve people more in the selection of corridors. There was a call for better community engagement.

9.2.20 Respondents felt landowners needed information about legal aspects of wayleaves and compensation and should have been invited to bespoke meetings. It was queried when and how landowners in the preferred corridors would be approached.

9.2.21 A number of comments were made in relation to the consultation process being seemingly at odds with SPEN's and its parent company Iberdrola's stated vision and values on protection and respect for people and the environment.

9.2.22 Respondents also expressed the opinion that SPEN's consultation had *"pit communities and individuals against each other".*

### Level and amount of detail

#### Summary of comments received

9.2.23 Many respondents said they found it difficult to comment on the preferred corridors without more detail about potential line routes. In some areas where the corridors were very broad respondents indicated that the limited information created uncertainty. There was a corresponding view that it was ineffective to consult at a stage before a clear route and sites were available.

9.2.24 Some respondents asked for more information about the need for the project, including detail about the current and future generating potential in the area and who would benefit from the transmission of electricity.

9.2.25 It was felt information should have been much more explicit on the height and size of the new infrastructure, with visual representations to enable people to make a comment.

9.2.26 There was a query whether the consultation process would be rerun if a preferred corridor was not chosen.

9.2.27 There was a request for more information about the plans of other transmission companies around Harker onwards.

## 9.3 The consultation process

9.3.1 The topics which are identified under this theme include:

- Launch of the consultation;
- Advertising and publicity; and
- Timing and duration of the consultation.

### Launch of the consultation

#### Summary of comments received

9.3.2 There were reports that some people had not received a leaflet or did not remember receiving it, or had found out about the consultation late, or missed the exhibitions. Residents of Courthill Park believed they were left out altogether.

9.3.3 Respondents said the project leaflet was badly designed and/or packaged and felt that it may have been discarded in error as junk mail.

9.3.4 It was felt that more should have been done to inform landowners and property owners, particularly those who did not live in the consultation area, for instance people with holiday homes.

### Advertising and publicity

#### Summary of comments received

9.3.5 Respondents felt the consultation should have been publicised more widely and that there was a lack of awareness about the consultation.

9.3.6 There was a query why SPEN had not taken out public notices and a request for future publicity.

### Timing and duration of the consultation

#### Summary of comments received

9.3.7 A number of respondents felt the time given for them to submit responses was too short, even with the additional five weeks' extension to 31 August. This was in part due to the amount of detailed information, which was perceived as too much for busy lay people to interpret.

9.3.8 People objected to the fact that the consultation ran into the school holiday period, when many people were away, and elected representatives were in recess. Some people viewed this with suspicion, feeling it was undertaken in order to minimise the response to the consultation.

9.3.9 There was a concern that, the last day of consultation being a bank holiday, people may have missed the deadline due to extended postal times.

## 9.4 Consultation materials

9.4.1 The topics which are identified under this theme include:

- Overall view of the materials;
- Leaflet;
- Feedback form;
- Website;
- Project documents;
- Maps;
- Exhibitions; and
- Information points.

### Overall view of the materials

#### Summary of comments received

9.4.2 There were a range of views about SPEN's consultation materials, with some considering the materials useful and informative and others challenging the accuracy of the data provided. Similarly, a number of respondents felt the consultation materials were too technical and therefore confusing and others that there was not enough information.

### Leaflet

#### Summary of comments received

9.4.3 Respondents commented that, as a summary, the leaflet was fine. But some suggested that it contained too much emphasis on the benefits of the project, such as line removal, and not enough explanation of what was being proposed.

9.4.4 Some felt the leaflet gave the impression that the project was mainly about upgrading old lines, or that capacity upgrades were for the benefit of Dumfries and Galloway. This was perceived to be disingenuous and misleading.

9.4.5 Some respondents felt the phrase line 'removal' was misleading and should have been 'replacement' due to a net addition of lines as a result of this project.

9.4.6 There was a comment that the image showing substation siting area D4 was misleading in that it did not show any of the neighbouring houses or factories, or Racks village.

### Feedback form

#### Summary of comments received

9.4.7 There were comments that the feedback form did not address the issues of concern to respondents. There was a view that all the alternative siting areas in each location should have been listed in the form as well.

### Website

#### Summary of comments received

9.4.8 There were concerns regarding the consultation website. Some found the maps, documentation and online feedback form hard to find. There was a comment that some links led to blank pages.

9.4.9 There were several comments that the capacity of the online feedback form to take text was too limited – with particular reference to questions 12 and 13.

9.4.10 A few respondents mentioned that the options in the drop-down box for personal title was limited to Mr, Mrs or Miss, which they felt was discriminatory.

9.4.11 A number of people reported having problems submitting the feedback form online.

9.4.12 There was a comment that the resolution of the maps in the downloadable versions of the *Routeing and Consultation Document* was not very clear.

9.4.13 Conversely, a number of respondents commented that the information presented on the website was informative and useful.

9.4.14 There was a view that people without internet access would have found it difficult to access the project information documents and as such it was inappropriate that documents were available mainly online.

### Project documents

#### Summary of comments received

9.4.15 There was appreciation for SPEN's detailed background work and assessments outlined in the project documents.

9.4.16 There was a suggestion that details in the document had changed after publication.

9.4.17 Respondents requested a clearer explanation of how SPEN intended to mitigate the impact on residents, the wildlife and scenery, and address the reduction in monetary value of property as a result of the project.

9.4.18 Respondents were unsure how areas were chosen or how SPEN intended to meet its stated aim of balancing the technical, environmental and economic needs of the project. There was a comment that there was not enough information on some of the alternative substation siting areas, particularly around Newton Stewart.

9.4.19 It was felt that more information should have been supplied about corridor width, the design of the towers and the amount of area the project would sterilise from future development. There was a further suggestion that information should have been provided on matters such as access for construction and maintenance, the impact on roads and the presence of other infrastructure.

9.4.20 There was also a comment that not enough information had been provided about the issue of Electric and Magnetic Fields (EMFs) in that the only mention was in a referred document written by National Grid. It was stated that this does not comply with the two Code of Practices on EMFs from power lines published by the Department of Energy and Climate Change (DECC) in March 2012 and agreed by the National Grid and the Energy Networks Association (ENA).

### Maps

#### Summary of comments received

9.4.21 Some respondents felt the quality of the maps in the leaflet, online and at the information points lacked definition. It was felt it would have been more helpful if larger-scale maps had been available.

9.4.22 It was pointed out that Courthill Park community was missed from maps in Zone 5.

9.4.23 There was a belief that the boundary of Zone 5 in the project leaflet was different to the maps at the exhibitions.

### Exhibitions

#### Summary of comments received

9.4.24 Respondents said staff at SPEN's exhibitions were well-informed, helpful and approachable. However, some people felt they received vague or contradictory answers to some questions and that staff had displayed lack of personal knowledge of the local area. There were concerns that local engagement at the exhibition in Newton Stewart was poor with reference to the substation siting area NS5 near Challoch.

9.4.25 It was felt difficult to get access to the maps at busy times due to them being on tables rather than display boards.

9.4.26 Some respondents felt the venue for the exhibition in Kirkcudbright should have been in the town centre rather than at the community centre.

9.4.27 There was a comment about the drop-in event organised at the request of Tongland and Ringford Community Council which had not been advertised by SPEN. It was felt that this had resulted in low numbers. It was suggested that the reason given for not advertising was that SPEN staff had felt overwhelmed at a previous event.

9.4.28 Some respondents felt a more formal, debate-type meeting would have been helpful at which topics could have been discussed.

9.4.29 There was a suggestion that an independent professional, such as a planning official, should also have been at the exhibitions to give people impartial advice.

## Information points

#### Summary of comments received

9.4.30 There was a comment that hard copies of project documentation had not been available at Longtown Library.

9.4.31 Respondents felt locations for information points offered limited access at evenings or weekends.

## 9.5 Suggestions for future rounds of consultation

### Summary of comments received

9.5.1 Respondents felt the use of 3D visual imagery, or images of the proposed line against actual landscape or satellite photographs, would have helped people understand the scale and impact better.

9.5.2 It was suggested that a questions and answers section in plain English would have been helpful.

9.5.3 Several people expressed a hope that SPEN had adopted lessons learned from the experience of communicating over the Beauly to Denny project.

9.5.4 There was a suggestion to include a smaller map of the whole route with a series of more detailed ones of each area.

9.5.5 There was a comment that SPEN should proactively educate people about the project more, to help them understand that everyone needs electricity.

9.5.6 There was a request to improve the information provided about EMFs.

9.5.7 It was suggested that a section on how local suppliers can benefit from the scheme should be included.

9.5.8 A number of means to advertise future rounds of consultation locally were suggested, such as advertising in shops, pubs, community centres, libraries, post offices, health centres and supermarket noticeboards, erecting static displays in village halls or empty shop windows and using temporary banners on exhibition days.

9.5.9 It was suggested that more information should be shared with communities via the community and parish councils.

9.5.10 It was suggested that future mailings be sent to named householders in clearly marked envelopes identified as containing important information about power lines in your neighbourhood.

9.5.11 Paper versions of consultation report to be made available for residents with poor or no internet.

# 10. Evaluation of consultation with members of the public

## 10.1 Overview

10.1.1 The information in this chapter relates to consultation with members of the public. Feedback from statutory and non-statutory stakeholders, community interest groups and MPs and MSPs is contained within Appendices A to E of this document. Please refer to Chapter 3 for details of consultation with these groups of stakeholders.

## 10.2 Who took part

10.2.1 A total of 805 visits were recorded to the public consultation events. Appendix V details the number of attendees to each consultation event. During the first round of consultation, the website received 4,700 visits.

10.2.2 These figures represent a very small proportion of those people made aware of the DGSR Project through leaflets, letters, local adverts and other awareness raising activities. It may be that those who did not engage chose not to do so, perhaps because they felt the project did not affect them, or they were unconcerned. It is possible that they did not feel strongly enough, either positively or negatively about the proposals, to attend or forward concerns/ideas, or that they had at this stage no additional views to add.

10.2.3 An *'About You'* section on the DGSR Project's official printed and online feedback forms (Appendix G) was used to monitor information given by the respondents. This monitoring exercise gathered information about those choosing to respond to the first round of consultation. The data collected included names/organisations, addresses, email addresses and age categories. Although not all respondents provided the information in its entirety, it gives an indication about which sectors of the wider community took part. This will be assessed by SPEN to improve the reach and penetration of future rounds of consultation.

10.2.4 From the feedback received, 1,338 people supplied postcodes or other information, enabling their location to be tracked. Respondents from South Ayrshire were predominantly from the KA6 postcode area. Respondents from Cumbria were predominantly from the CA6 area. The largest number of respondents had Dumfries and Galloway postcodes. The locations of all respondents who supplied this information are shown in **Chart 10.1**. Locations are further broken down in **Chart 10.2**.

**Chart 10.1 Locations of all respondents to the first round of consultation (where given)**

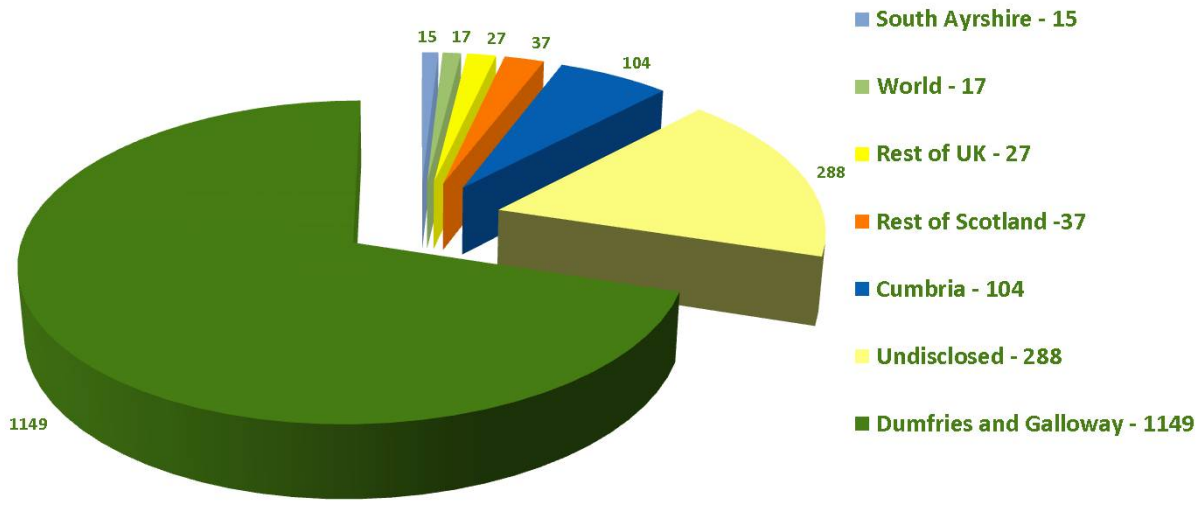
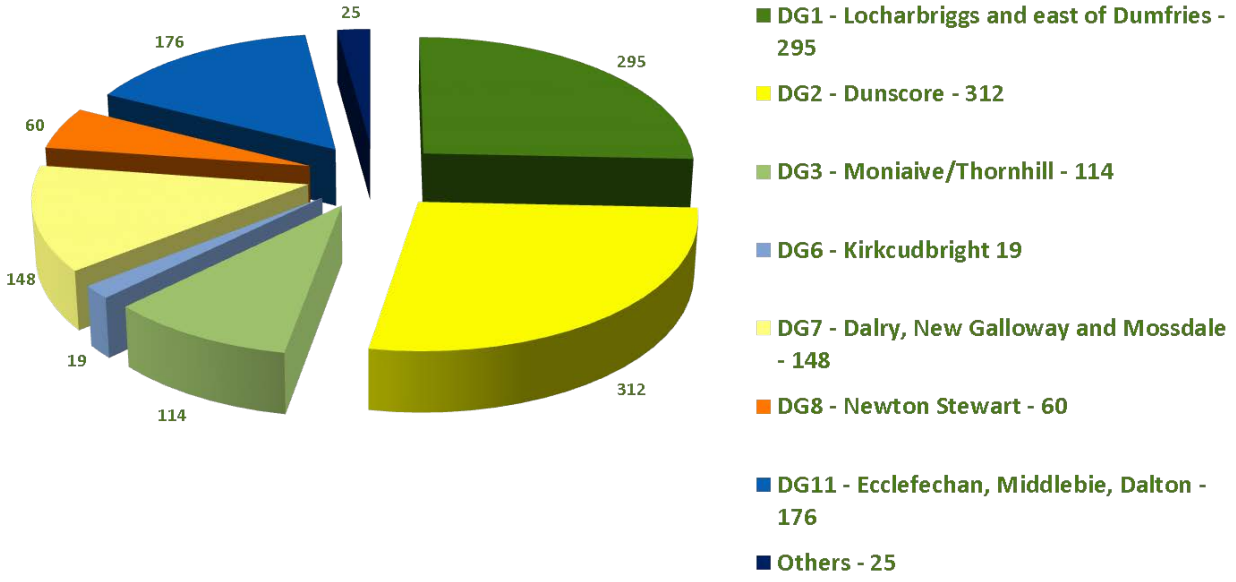
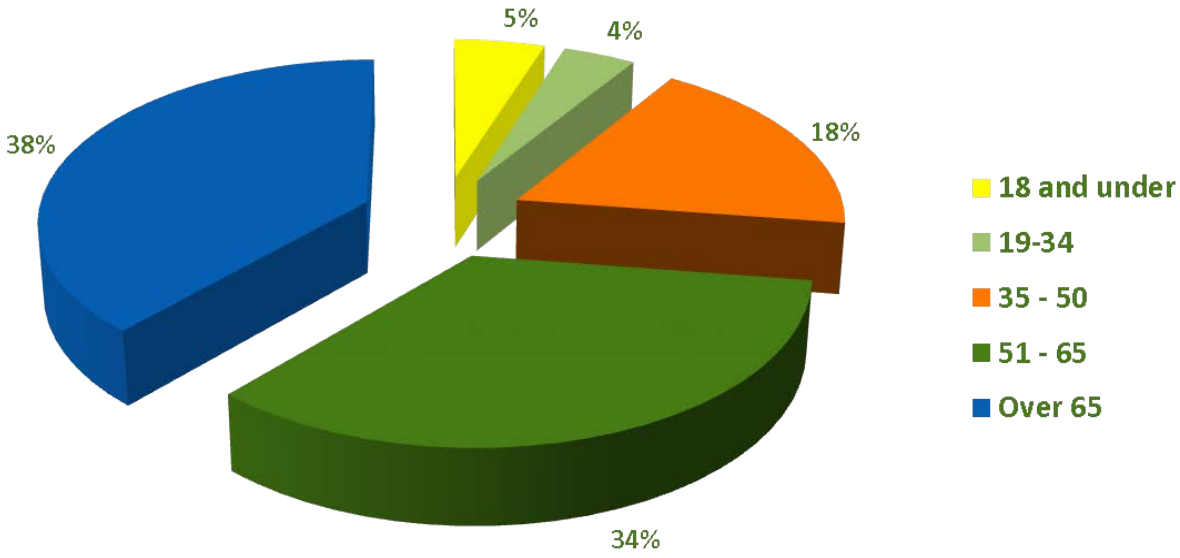



**Chart 10.2 Locations of respondents from Dumfries and Galloway (where given)**



10.2.5 From the feedback forms received, 383 people identified their age group. The breakdown is shown in **Chart 10.3**.

**Chart 10.3 Ages of respondents to the first round of consultation (where given)**




## 10.3 Ongoing consideration of feedback

10.3.1 SPEN will continue to consider the local information people provided in their feedback to inform the project's development and to improve communication strategies for the next round of consultation.

10.3.2 SPEN will keep communities up to date as its proposals move forward and there will also be further opportunities for people to provide feedback as part of future rounds of consultation.

# Glossary

**Amenity:** A positive element or elements that contribute to the overall character, enjoyment or value of an area. For example, open land, trees, historic buildings and the interrelationship between them, or less tangible factors such as tranquillity.

**Ancient woodland:** Woodland that has existed continuously since at least AD 1600.

**Biodiversity:** The variety of life forms, the different plants, animals and microorganisms, the genes they contain and the ecosystems they form.

**Consultation Strategy:** The Consultation Strategy which is based upon planning principles for a National Development for overhead transmission lines (in Scotland) and Nationally Significant Infrastructure Projects (in England) and current Government guidance, and will involve local authorities, communities and statutory consultees early in the project development to bring about benefits for all parties.

**Consultation zone:** The consultation zone for the DGSR Project which extends approximately 1 km either side of the broad corridors.

**Converter station:** A specialised type of substation which contains the terminal equipment for a high-voltage direct current (HVDC) transmission line. It converts direct current to alternating current or the reverse.

**Corridor**: A swathe of land between two substations within which potential routes for overhead lines may be sought.

**Cost-benefit analysis:** A process by which business decisions are analysed. The benefits of a given situation or business-related action are totalled and then the costs associated with taking that action are subtracted.

**Cumulative impact:** Impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions, together with the project.

**Designated area:** Area designated and protected by national or international law for its landscape, biodiversity, or historic interest.

**Ecological Clerk of Works (ECoW):** ECoWs ensure that planning conditions are adhered to and that operatives do not break the law; particularly important when working near sensitive sites, such as a Site of Special Scientific Interest (SSSI).

**Electric and Magnetic Fields (EMFs):** Electric field: A measure of the force experienced by a static electric charge in the presence of the other electric charges. Magnetic field: A measure of the force experienced by a moving electric charge, due to the motion of other charges.

**Environmental Impact Assessment (EIA):** The statutory process of gathering environmental information; describing a development; identifying and describing the likely significant environmental effects of the development; defining ways of preventing/avoiding, reducing or offsetting any adverse environmental affects; consulting the public and specific bodies with responsibilities for the environment and presenting the results to the decision maker to inform the decision on whether the development should be approved.

**Environmental Statement (ES):** A document that includes all of the environmental information which is reasonably required to assess the environmental effects of a development having regard to current knowledge and methods of assessment and produced in accordance with the EIA Regulations.

**Holford Rules:** Guidance for the routeing of new high voltage overhead transmission lines.

**Horlock Rules:** Guidance for the siting and design of new substations.

**HVDC (high-voltage direct current):** A highly efficient alternative to alternating current for transmitting large amounts of electricity over long distances and for special purpose applications.

**Kilovolt (kV):** 1,000 volts.

**Landscape and Visual Impact Assessment (LVIA ):** A tool used to identify and assess the likely significance of the effects of change resulting from development both on the landscape as a resource and on people's views and visual amenity. May form part of the Environmental Impact Assessment.

**Landscape capacity:** The degree to which a particular landscape character type or area is able to accommodate change without unacceptable adverse effects on its character. Capacity is likely to vary according to the type and nature of change being proposed.

**Landscape character:** The distinct and recognisable pattern of elements that occurs consistently in a particular type of landscape, and how this is perceived by people. It reflects particular combinations of geology, landform, soils, vegetation, land use and human settlement. It creates the particular sense of place of different areas of the landscape.

**Landscape character type (LCT):** Distinct types of landscape that are relatively homogeneous in character. A landscape type will have broadly similar patterns of geology, landform, soils, vegetation, land use, settlement and field pattern discernible in maps and field survey records.

**Low carbon generation:** Electricity that comes from processes or technologies that cause lower amounts of carbon dioxide emissions than are emitted from conventional fossil fuel power generation (those using coal, oil or gas as a fuel).

**Megawatt (MW):** 1,000,000 watts.

**Moratorium:** A delay or suspension of an activity or a law.

**National Grid Electricity Transmission (NGET):** The company which is the GB electricity transmission network System Operator, responsible for operating the 275kV and 400kV electricity transmission network in England and Wales and for overseeing the operation of the 275kV and 400kV networks across Scotland, England and Wales.

**National Scenic Area (NSA):** A conservation designation used in Scotland, and currently administered by Scottish Natural Heritage. NSAs are defined as having outstanding scenic interest or unsurpassed attractiveness.

**Nationally Significant Infrastructure Project (NSIP):** A definition which applies in England and Wales to large projects that support the economy and vital public services, including railways, large wind farms, power stations, reservoirs, harbours, airports and sewage treatment works, as defined in the *Planning Act 2008*.

**Need case:** Document setting out the background requirements and need for extensions/reinforcements to SPEN's electricity transmission system in response to connection applications to ensure that SPEN complies with its licence standards.

**Non-statutory consultees:** Consultees who, whilst not designated in law, are likely to have an interest in a proposed development.

**Ofgem:** The Office of the Gas and Electricity Markets (Ofgem) is the regulator for Britain's gas and electricity industries. Its role is to promote choice and value for customers.

**Overhead line**: An electricity line installed above ground, usually supported by lattice steel pylons or wooden poles.

**Preferred corridor**: Culmination of the Step D appraisal, the preferred corridor is identified following technical and environmental considerations. (Step D is the Approach to Appraisal of Route Corridor Options and Substation Siting Areas in the Routeing and Consultation document.)

**Preferred substation siting area**: Culmination of Step D (see above) appraisal, the preferred substation siting area is identified following technical and environmental considerations.

**Proposed corridor:** The corridor selected following a review of feedback in the first round of consultation to go forward to the next stage of the routeing process, which is the identification and appraisal of line route options.

**Proposed substation siting area:** The siting area selected following a review of feedback in the first round of consultation to go forward to the next stage of the siting process, which is the identification and appraisal of substation site options.

**RIIO-T1:** The first transmission price control review which set out what the transmission network companies are expected to deliver and details of the regulatory framework that supports both effective and efficient delivery for energy consumers over the eight years from 2013–21. Regulated by Ofgem.

**Regional Scenic Area (RSA):** An area of scenic value at the regional scale which has a level of protection in Dumfries and Galloway Council's Local Development Plan.

**Schedule 9 Statement:** A document which sets out how a company aims to incorporate environmental considerations into its business according to duties under Schedule 9 of the *Electricity Act 1989.*

**Site of Special Scientific Interest (SSSI):** The main national conservation site protection measure in Britain designated under the *Wildlife and Countryside Act 1981*.

**Socio-economic impact:** The impacts development has on community social and economic well-being.

**SPEN**: ScottishPower Energy Networks or SP Energy Networks, the company responsible for the development, operation and maintenance of electricity transmission and distribution networks in Central and Southern Scotland.

**Statutory Stakeholder Liaison Group (SSLG):** A group made up of the DGSR Project's statutory stakeholders from both Scotland and England. The main aim of this group is to ensure good lines of communication with statutory consultees and to discuss the key planning, landscape and environmental matters relating to the project.

**Statutory consultees:** Bodies or persons which must be consulted on certain planning and development consent applications as set out in law.

**Strategic Wider Works (SWW):** A mechanism set by Ofgem as part of the RIIO-T1 price control process, which allows Transmission Owners to bring forward large investment projects. It allows Ofgem to consider the need and funding for these projects during the price control period, so that delivery of these outputs can be brought forward in a timely manner.

**Study area:** A broad area within which the routeing and siting study took place.

**Substation**: Infrastructure which controls the flow and voltage of power by means of transformers and switchgear, with facilities for control, fault protection and communications.

**Substation siting area**: An area of land large enough to accommodate each substation design option in a number of locations.

**System Operator:** The company which operates the GB electricity transmission system as a whole. This is National Grid Electricity Transmission plc (NGET) in Great Britain.

**Terms of Reference:** A description of the purpose and structure of a project, committee, meeting, negotiation, or any similar collections of people who have agreed to work together to accomplish a shared goal.

**Tower:** A galvanised steel lattice structure which carries the conductors and earth wires. Each overhead line will require several different types of tower including line, angle and terminal towers. (Line towers are used for straight sections of the line; angle towers are used where the line changes direction; and terminal towers are used where an overhead line terminates).Towers can also be referred to as pylons.

**Transmission Operator:** The company which owns and maintains the electricity transmission network in an area. In Central and Southern Scotland this is SPEN. In England and Wales this is National Grid.

**Undergrounding:** The name for laying electricity cables in a trench in the ground.

**Visual amenity:** The value of a particular view or area in terms of what is seen by people whether living, working or travelling through an area.

**Volts**: The international system unit of electric potential and electromotive force.

**Watt**: The unit of electric power.

**Zone of Theoretical Visibility (ZTV):** A computer-generated map showing areas of land from which a development is theoretically visible. It is theoretical in that there may be visual barriers, such as buildings or trees, which would screen it. ZTVs can be used as part of a Landscape and Visual Impact Assessment (LVIA).